

# WHOLESALE & RETAIL SETA

## Assessment, Internal and External Moderation Policy

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## 1. BACKGROUND

W&RSETA QA has established a framework for the facilitation of assessment, internal and external moderation for use in its programmes. Assessments that are accessed by learners are done so through accredited SDP's. Internal moderation, that is facilitated by the SDP, must determine if the principles of assessment have been adhered to. External moderation will be facilitated by the W&RSETA and is designed to determine if assessments and internal moderation were facilitated in a valid, reliable and practicable manner. The specific compliance requirements have been further outlined in this policy document.

## 2. PURPOSE

The purpose of this policy is to:

- Ensure that assessment measures learning in line with the **national qualification framework (NQF)**;
- Establish a framework for **moderation of assessment decisions** made against qualifications and/or unit standards for which the W&RSETA has been delegated as Quality Assurance Partner (QAP);
- Provide **learner access** to assessment under the ambit of accredited SDP's;
- Ensure external moderations of assessment decisions and moderation of training conducted against qualifications and/or unit standards are **assessed validly, reliably and practicably**;
- Confirm the **credibility of learner achievements** as dependant on appropriate internal quality assurance systems of assessments, internal and external moderation processes;
- Recognise the **roles and responsibilities of assessors, internal and external moderators and Quality Assurors (QA)** as being essential to delivery and quality assurance processes of programmes under W&RSETA;
- Provide mechanisms for handling **appeal decisions** on assessments, internal and external moderation; and
- Offer effect to quality assurance in assessment processes by establishing quality control mechanisms for assessment through a **system of sampling, internal and external moderation** and validation as appropriate to qualifications, skills programmes or unit standards.

## 3. SCOPE

The policy applies to all assessment, internal and external moderation conducted by practitioners registered by the W&RSETA. The policy further applies to all SDP's approved to offer programmes under the delegation of W&RSETA.

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#### 4. RELATED INFORMATION AND LEGAL REFERENCE

This policy must be read in conjunction with the following supporting documents:

##### 4.1 Internal Documents

- W&RSETA Assessment, Internal & External Moderation Verification Tool
- Onsite External Moderation Tool
- QCTO Service Level Agreement with W&RSETA (1 April 2020 – 31 March 2023)

##### 4.2 External Documents

- QCTO Policy on Assessment Policy for Qualifications and Part Qualifications on the Occupational Qualifications Sub-Framework (OQSF) - Revised (March 2019)

##### 4.3 Legal Reference

###### Summary of legal and policy reference documents:

- Constitution of the Republic of South Africa (Act No 108 of 1996);
- Promotion of Administrative Justice Act (Act No. 3 of 2000);
- Skills Development Amendment Act (Act No. 37 of 2008);
- National Qualifications Act (No. 67 of 2008);
- SAQA 2014. National Policy and Criteria for Designation and Implementing Assessment for NQF Qualifications and Part-Qualifications and Professional Designations in South Africa;

In terms of section 32 of the NQF Act, SAQA and the Quality Councils (QCs) have the power to delegate any of their functions to a committee, any other body capable of performing the function.

Section 26I (1) of the Skills Development Act (SDA) further specifies that the QCTO may, in writing and subject to such conditions as it may determine, delegate any of its functions to -

- (a) the Chief Executive Officer of the QCTO;
- (b) a committee of the QCTO;
- (c) the national artisan moderation body established in terms of Section 26A of the SDA;
- (d) a SETA; or
- (e) any other suitable body.

Such delegation includes but is not limited to:

- Accredit constituent SDP's for specific standards or qualifications registered on the NQF;

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- Register constituent assessors and moderators for specific registered standards or qualifications in terms of the criteria established for this purpose;
- Take responsibility for the certification of constituent learners;
- Take responsibility for the certification of learner achievements;
- Maintain a data-base acceptable to SAQA and QCTO; and
- Submit reports in accordance with the requirements to SAQA.

## 5. ACRONYMS & DEFINITION OF TERMS USED

<b>QA</b>	Quality Assuror
<b>QCTO</b>	Quality Council for Trades and Occupations
<b>SDP</b>	Skills Development Provider
<b>QAP</b>	Quality Assurance Partner
<b>QMS</b>	Quality Management System
<b>Accreditation</b>	The certification, usually for a particular period of time, of a person, a body or an institution as having the capacity to fulfil a particular function in the quality assurance system set up by the South African Qualifications Authority in terms of the SAQA Act
<b>Accreditation Scope</b>	The list of qualification(s) and/or unit standard(s) for which a body is accredited for a defined purpose
<b>Assessor</b>	The person who is registered by the relevant Skills Development Quality Assurance Body in accordance with criteria established for this purpose by a Standards Generating Body to measure the achievement of specified National Qualifications Framework standards or qualifications, and "constituent assessor" has a corresponding meaning
<b>Assessment</b>	The process which ensures that the outcomes described in the National Qualification Framework standards or qualifications are achieved
<b>Quality Assurance</b>	Refers to the Unit /Department within the W&RSETA. This is the unit that will carry out the delegated function of the W&RSETA in terms of section 32 of the NQF Act, SAQA and the Quality Councils (QCs) have the power to delegate any of their functions to a committee, any other body capable of performing the function

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<b>High-Stakes Assessment Decision</b>	An assessment decision that has consequences with significant implications for the life opportunities, safety and well-being of learners or other people
<b>Moderation</b>	The process which ensures that assessment of the outcomes described in National Qualifications Framework standards or qualifications is fair, valid and reliable
<b>Moderator</b>	Someone who is competent and registered to conduct a moderation process
<b>Primary Focus</b>	The activity or objective within the sector which an organization or body concentrates its efforts
<b>Provider (Skills Development)</b>	A body that delivers learning programmes which culminate in specified National Qualifications Framework standards or qualifications and manages the assessment thereof
<b>Quality Assurance</b>	The process of ensuring that the degree of excellence specified is achieved
<b>Quality Assuror</b>	A person who ensures that the degree of excellence is achieved
<b>Registered Standards</b>	Unit standards or qualifications registered on the National Qualifications Framework
<b>Registration Scope</b>	The list of registered standards for which an assessor or moderator is registered with the SETA as an assessor or moderator
<b>Validation</b>	The final step in the QA process, which includes external moderation and endorsement of learner achievements
<b>Endorsement</b>	The signing off of external moderator reports by the designated QA to uphold results of assessment for learner certification
<b>Internal Moderator</b>	Someone appointed by the SDP to conduct an internal moderation process prior to external moderation
<b>External Moderator</b>	Someone appointed by the SETA in the final step to conduct moderation process prior to certification of learners
<b>Verification</b>	The final step in the QA process, which includes authenticating learner uploads on Indicium and approval for certification

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<b>Plagiarism</b>	Presenting someone else’s work or ideas as your own, with or without their consent, by incorporating it into your work without full acknowledgement. All published and unpublished material, whether in manuscript, printed or electronic form, is covered under this definition. Plagiarism may be intentional, reckless, or unintentional
<b>E-Learning</b>	Structured learning opportunities mediated through the use of digital resources (usually combinations of text, audio and visual/video files) and software applications. E-learning may be offered on-line and synchronously (e.g. real-time conference), on-line and asynchronously (e.g. text-based discussion forum) or off-line (e.g. interactive CD/DVD/flash drive). E-learning can be employed in both contact and distance programmes (DHET 2012).

## 6. POLICY

### 6.1 Policy principles

W&RSETA QA has identified the following principles which underpin this policy. These principles are consistent with W&RSETA QA values and policies in other areas:

Principle	Description
Authenticity	The assessor is satisfied that the evidence is attributable to the person being assessed.
Validity	Ensures assessment measures what it claims to measure. This is seen as one of the most important principles for assessment.
Reliability	The accuracy with which an assessment measures the skill or attainment it is designed to measure. A reliable assessment <b>consistently</b> gives the same results under similar conditions
Fair	In addition to assessment being valid and reliable, it also provides <b>equity</b> of opportunity for learners in line with equality legislation
Quality	A key principle in ensuring the credibility and status of W&RSETA QA accreditation. Quality will be assured through establishing policy and guidelines, national award standards, programme validation and national monitoring and evaluation by the QA function
Practicable	Ensuring that assessments take into account the available financial resources, facilities, equipment and time
Consistent	The same assessor making the same judgement under the same or similar circumstances

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Appropriate	Ensuring that the assessment is suited for the performance being assessed.
Systematic	The assessment being planned and recorded to ensure that the assessment is fair
Transparent	Assessment policy and guidelines must ensure clarity and understanding by all relevant stakeholders
Currency	The evidence is sufficient proof that the candidate is able to perform the assessment outcomes at the time the assessor declares the candidate competent
Sufficient	The evidence collected establishes that all criteria have been met and that performance to the required standard can be repeated consistently in the future

## 6.2 QA mandate and responsibilities

- 6.2.1 W&RSETA QA will ensure that SDPs conduct fair and consistent assessment along with internal moderation practices in line with QMS provision.
- 6.2.2 The W&RSETA QA will put into place necessary mechanisms on processing of results received from SDP's and the operation of an appeal process.
- 6.2.3 Accredited SDP's will be required to develop and operate assessment and moderation policies and procedures in line with their approved QMS.
- 6.2.4 W&RSETA QA will monitor SDP's, their programmes and attainment of the national standards to ensure effective implementation of fair and consistent assessment and internal moderation practices.

## 6.3 Assessment

### 6.3.1 Planning for assessment

- 6.3.1.1 SDP's will develop a coordinated assessment plan per programme.
- 6.3.1.2 The selected assessment methods will be appropriate to the programme content and its outcomes, which are in line with the standards of knowledge, skill and competence of the unit standard and/or qualification.
- 6.3.1.3 Where appropriate, a range of assessment methods should be applied - assessment should, where possible, be integrated with over-assessment avoided.
- 6.3.1.4 Appropriate language and expressions will be used in the assessment. Including marking of POEs for summative assessments in red.
- 6.3.1.5 Appropriate timing of assessment must occur, including setting of deadlines and related policies (e.g. Handling of assessment evidence submitted late).
- 6.3.1.6 The SDP should assure that the assessor fulfils their role in terms of planning, preparing and conducting assessment, providing feedback on assessment results to learners and providing review on assessments.
- 6.3.1.7 It is the responsibility of the SDP to put into place mechanisms to prevent plagiarism. The assessor must be able to detect/report the aspect of plagiarism in the learners' evidence. Failure to report/act on same could lead to the de-registration of the assessor/SDP.

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6.3.1.8 Assessment processes related to the Recognition of Prior Learning (RPL) must be available. These should be consistent with W&RSETA QA policy on RPL/CAT.

**6.3.2 Making assessment decisions**

- 6.3.2.1 Sufficient evidence will be gathered upon which to make an assessment decision.
- 6.3.2.2 Assessment marking will be consistent/reliable across internal assessors.
- 6.3.2.3 Assessment will be undertaken by a suitably qualified and registered assessor (i.e. have relevant qualifications and/or relevant current knowledge, skill and competence in the area which they are assessing). Failure to comply will impact on the accreditation status of the SDP.
- 6.3.2.4 Assessment systems will include internal moderation and other validation processes.
- 6.3.2.5 Learner information forwarded to W&RSETA QA for certification purposes should be accurate and reliable.
- 6.3.2.6 An internal appeals mechanism will be in place for learners wishing to appeal the outcome of an assessment and/or internal moderation.
- 6.3.2.7 SDP’s will have in place arrangements for corrective action, if and when issues arise that could impact on the validity of results/certification.
- 6.3.2.8 These W&RSETA QA must be immediately notified of any issues arising out of assessment/internal moderation processes prior to external moderation.

**6.3.3 Security**

- 6.3.3.1 Assessment systems will incorporate appropriate mechanisms for the safe recording, storing and accessing learner’s assessment records.
- 6.3.3.2 Backups of assessment reports and decisions are to be maintained for a period of 5 years after assessments are conducted.

**6.3.4 Informing learners**

- 6.3.4.1 Assessment will be transparent and all pertinent information will be made available to learners, prior to the assessment.
- 6.3.4.2 Processes will be in place to ensure clear results are given to learners in a timely manner.
- 6.3.4.3 Constructive formative feedback as appropriate, should be given to learners and learners should have a clear line of communication with the assessor for any clarity or support.

**6.3.5 Reasonable accommodation**

- 6.3.5.1 Reasonable accommodation regarding the adaptation of assessment will be made, as necessary, to cater for the needs of learners.
- 6.3.5.2 Where reasonable accommodation is made, proof of same must be retained and presented during external moderation.

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## 6.4 Internal Moderation

- 6.4.1 Internal Moderation is at the heart of quality assurance in all programmes, both within the national framework and the quality and management systems of each SDP. Its role is to ensure that assessments consistently meet and exceed national standards.
- 6.4.2 Internal Moderation will be undertaken by a suitably qualified and registered Moderator (i.e. have relevant qualifications and/or relevant current knowledge, skill and competence in the area which they are assessing). Failure to comply will impact on the accreditation status of the SDP.
- 6.4.3 Internal Moderators will have the technical and subject matter expertise relevant to the unit standards and or qualification(s) for which they are responsible to enable accurate judgements to be made about the assessment judgements.
- 6.4.4 Although internal moderators may provide useful input into assessment issues in areas where they are not subject-matter experts, they may be unable to judge whether acceptable assessment decisions have been made in areas in which they are not themselves competent.
- 6.4.5 The internal moderator should not be the same person as the assessor for quality assurance purposes. Such moderator shall have no actual or perceived interest in the outcome of the assessment. If no such moderator is available within the SDP, it the SDP’s responsibility to source such an internal moderator.
- 6.4.6 Appropriate language and expressions will be used in the internal moderation process including marking of POEs for internal moderation in green.
- 6.4.7 In relation to any “high-stakes” assessment (e.g. where the declaration of competence impacts on the health and safety of persons), subject-matter competence of assessors and moderator/moderators is mandatory.
- 6.4.8 Internal moderators must be familiar with (and continuously refresh their understanding of):
- Current unit standards and qualifications;
  - Relevant policies, legislation and regulations; and
  - Quality assurance and reporting requirements.
- 6.4.9 Internal moderators must have the skills required to effectively and efficiently perform all functions according to current methods, including, but not limited to: communication with the QA, SDP’s, assessors, assessment agencies and candidates.
- 6.4.10 Internal moderation includes consideration of:
- The design of the assessment itself to ensure that the choice and design of assessment methods are appropriate for the standards being measured by the assessment;
  - The implementation of the assessment according to the specified guidelines and plans; and
  - The moderation of actual evidence in the learner’s summative assessment.
- 6.4.11 The verification and review of assessment processes must ensure that assessors are using feedback to constantly develop their processes.

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- 6.4.12 Internal Moderators must fulfil the roles and functions allocated to them in terms of the relevant policies and procedures of the QCTO, SAQA, the W&RSETA QA and in particular that of constituent accredited SDP's. Such roles and functions may include and is not limited by:
- a) Carrying out and evaluating internal assessment and quality assurance systems.
  - b) Supporting SDP's and assessment agencies in identifying the assessment and moderation capacity required to implement the NQF and the skills development strategy effectively.
  - c) Conducting moderation of assessment instruments, plans and guides on any occasion in which these are first used, or are revised, including documenting proof of individual learners' competence status.
  - d) Verifying that assessments are fair, valid, reliable and practical.
  - e) Identifying areas of improvements within the assessment system.
  - f) Provide support and guidance to assessors.
  - g) Identifying the need to redesign assessments, assessment tools/instruments if required.
  - h) Identifying the need to redesign moderation, moderation systems, tools if required.
  - i) Conducting moderation of assessment results and records using a 10% minimum sample as prescribed by organisational and sectoral policies.
  - j) Evaluating the performance of registered assessors and ensuring their registration is valid with the W&RSETA QA.
  - k) Providing an appeals procedure for dissatisfied learners and further assist in finding amicable solutions.
  - l) Reporting on quarterly basis to relevant parties, including the W&RSETA QAP, on the results of their moderation.
  - m) Initiating appropriate strategies to continuously improve the quality of assessments.
  - n) Contributing toward enhancement of integrity and credibility of the national system for assessment and certification.

## 6.5 External Moderation

- 6.5.1 The W&RSETA QA moderation of SDPs, and learning programmes is a comprehensive check on achievement and ensures that a learner is given the best opportunity to achieve competence.
- 6.5.2 To maintain independence and objectivity within the external moderation process, the external moderator will not have been participating in the W&RSETA programmes under assessment/internal moderation.
- 6.5.3 All external moderators will be contracted through an independent process facilitated by the Supply Chain Unit of the W&RSETA.
- 6.5.4 External Moderation is conducted on behalf of the QA by competent contracted external moderators on a random sample of 10% of learner evidences (PoE's) but this sample may be increased at the discretion of the W&RSETA QA. The external moderation process entails the following;

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- 6.5.4.1 The SDP studies the external moderation requirements provided by the QA before submitting the external moderation pack for evaluation. Everything needs to be in place before submission. This includes but is not limited to: all uploads on SETA management system completed, internal moderation done and all internal quality checks completed.
- 6.5.4.2 Unit Standards that do not fall within the W&RSETA delegation, should be quality assured by the quality assurance body as stated on the South African Quality Assurance (SAQA) document. The SDP will have to make sure they have scope with the quality assurance body and contact same to make arrangements for external moderation processes.
- 6.5.4.3 The SDP prompts the relevant project coordinator that external moderation is required. The respective official managing the project will then alert the responsible QA. The QA will engage the SDP by requesting a sample for external moderation. External moderation can only be requested after all results are loaded on the W&RSETA system and internal moderation has concluded. In this regard:
- Learner statuses on the system must be reflective of the final credits accumulated by the learner/s on completion of the programme.
  - The SDP is to draw an SMS Report from W&RSETA system on the full cohort of learners being requested for external moderation. This includes partially and learners with 0 credits.
- 6.5.4.4 The SDP may alert the responsible QA for external moderation directly, where no designated project coordinator / W&RSETA official has been allocated to a project.
- 6.5.4.5 External moderation is serviced by the regional office where the employer/contract and project is managed.
- 6.5.4.6 The sample will be selected by the relevant QA from the total list of learner assessment results according to a structured and random selection.
- 6.5.4.7 The external moderator contracted to the W&RSETA will evaluate the external moderation sample submission (including accompanying evidence and reports) and either uphold or not uphold for certification.
- 6.5.4.8 The QA will evaluate the reports from the external moderator and either endorse or not endorse for certification.
- 6.5.4.9 In the event of non-endorsement, the QA will communicate with the provider on remedial or corrective actions to be taken (where appropriate) with a timeframe for completion. Serious/repetitive non-conformances may be referred for further investigation and reported to the relevant quality council for action.
- 6.5.5 The QA will conduct a 50% onsite visit for W&RSETA funded projects with the aim of highlighting any potential issues prior to final external moderation. Requests must be facilitated through the project official managing the project in strong consultation with the QA.

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## 6.6 Re-assessment requirements

In line with the objective of cost effectiveness prescribed by the NQF, it is recommended that the assessment systems should permit for re-assessment of learners. It is the QA recommendation that learners should be given no more than one summative assessment and two re-assessment opportunities to reflect competence. There are different cases for re-assessment. These could include:

- If a learner has not yet achieved the level of competence required to meet the stated learning outcomes of a particular summative assessment task(s), the learner should be re-assessed.
- If a learner has not yet achieved the overall level of competence required in an assessment to be credited with the registered unit standards or qualifications.
- Issues surrounding irregularities uncovered in the assessment process.

## 6.7 E-Learning

The W&RSETA E-Learning Policy provides further specifications related to assessment/internal and external moderation provision.

## 6.8 Learner appeals during assessment/internal moderation

- 6.8.1 Any learner, who feels that he/she has been unfairly assessed, may institute an appeal.
- 6.8.2 All candidates shall be provided with the Appeals Procedure/Process of the SDP.
- 6.8.3 All appeals are to be sent to the internal moderator of the SDP using approved documentation.
- 6.8.4 The moderator shall channel the appeal to one of two areas:
  - The appeals committee (for appeals against decisions).
  - The SDP's management (for appeals against the conduct or compliance of the moderator him/herself).
- 6.8.5 An appeal should be lodged within ten working days by the learner.
- 6.8.6 The appeal should be resolved within 2 weeks of being lodged (with communication sent to all parties within this time).
- 6.8.7 The committee should evaluate the issue objectively and review the assessment/moderation process, leading to a documented decision.
- 6.8.8 The relevant committee may recommend remarking/reassessing the evidence or allow the learner to undertake the practical task (if such was previously practical in nature) in the presence of another moderator and/or assessor.
- 6.8.9 All persons involved in the appeal shall be provided with the results of the appeal.
- 6.8.10 If after re-evaluating the learner's evidence, it is found that there was an error on the part of the assessor/moderator and/or related processes, the learner should be allocated with the appropriate outcome. Documentation of such must be maintained and updated on the W&RSETA system and corrective action implemented by the SDP to prevent reoccurrence.
- 6.8.11 The appeal and the results of the appeal must be recorded and stored electronically against the learner record (PoE) for a period of 5 years.

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## 6.9 Appeals

- 6.9.1 An SDP has a right to appeal any external moderation/QA decision taken under facilitation of this policy and/or related procedure.
- 6.9.2 An SDP wishing to appeal against any accreditation report/decision may make a written submission to the respective Provincial Manager of W&RSETA to that effect together with reasons for the appeal within one calendar month of such decision/report being received.
- 6.9.3 Should the W&RSETA Provincial Manager not support the decision that lead to an appeal from an SDP, the W&RSETA QA shall –
- amend the decision accordingly;
  - record such amendment in all the relevant documentation where the original decision was recorded;
  - make the necessary amendments to all the relevant documentation; and
  - issue revised versions of all relevant documentation.
- 6.9.4 Should the W&RSETA Provincial Manager support the decision that lead to an appeal; the SDP may escalate the appeal within two weeks to the Senior Regional Manager. Should the Senior Regional Manager not support the decision that lead to an appeal from the SDP, Steps a – d under 6.9.3 will be followed.
- 6.9.5 Should the Senior Regional Manager support the decision that lead to an appeal, the SDP may escalate the appeal within two weeks to the office of the Chief Operations Officer (COO) of the W&RSETA. Should the W&RSETA COO not support the decision that lead to an appeal from an SDP, Steps a – d under 6.9.3 will be followed.
- 6.9.6 Should the W&RSETA COO support the decision that lead to an appeal from an SDP, the SDP may escalate the appeal within two weeks to the QCTO.

## 7. EXCLUSIONS

None.

## 8. REQUEST TO DEVIATE FROM POLICY

Requests to deviate from any provision of this policy may be made to the Accounting Authority in writing. The Chief Executive Officer has powers to grant such request in whole or in part or refuse it. Unauthorised deviations may result in disciplinary action

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Version Control	Created: July 2012	
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	Reviewed: 18/11/2020	



# Policy Approval & Sign-off

## 1. POLICY INFORMATION

Policy Name	
Policy Reference Number	

## 2. RECOMMENDATIONS/ ENDORSEMENTS

Recommended  Not Recommended

Comments... The Committee considered the Policy and recommended approval.  
 .....  
 .....

Name of Committee Governance and Strategy.....

Committee Chairperson Lucas Ramathodi.....

  
 \_\_\_\_\_  
**Signature** 18 / 12 / 2020  
**Date**

## 3. APPROVAL BY W&RSETA ACCOUNTING AUTHORITY

Approved  Not Approved

Comments.....  
 .....  
 .....

  
 \_\_\_\_\_  
**Reggie Sibiyia** 21 December 2020  
**Date**  
**W&RSETA Board Chairperson**

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