

External Moderation Policy

1 What is External Moderation?

- 1.1 Skills and Education Group Awards¹, through its external moderation policy, ensures that approved centres provide learners with access to fair and reliable assessment opportunities, and that evidence of learner achievement meets the standard required by the published learning outcomes and assessment criteria of our qualifications. It confirms the authenticity, validity and objectivity of assessor practice.
- 1.2 It is expected that centres will have a minimum of one annual moderation visit or remote moderation per sub-sector (curriculum area) dependent upon the type, volume and nature of the qualifications/units offered.
- 1.3 It is a flexible system which may be applied at any time of the year but usually towards the end of a course, or when learners have completed all planned assessment requirements.
- 1.4 Centres are expected to keep learners informed about the external moderation process and must make it clear to learners that achievement cannot be confirmed until moderation has taken place.
- 1.5 Where external moderation involves a visit, additional quality checks are made to ensure continued compliance with our Centre Agreement, policies and procedures.

2 Who carries out External Moderation?

- 2.1 We train, appoint², and monitor external moderators who carry out the external moderation process on our behalf.
- 2.2 All external moderators are subject specialists and have detailed knowledge of the sub-sector and administrative arrangements to support the qualifications/units they moderate. They are appointed according to set criteria and are inducted and trained in our policies and procedures.
- 2.3 External moderators act as our representatives liaising with centres to sample and confirm assessment decisions. They review the Centre's internal assessment

Reviewed: Jul2019 Regulatory Conditions: H2 Page 1 of 8 SEG Awards_External Moderation Policy Final 19-20

¹ Skills and Education Group Awards is a recognised awarding organisation and part of the Skills and Education Group.

² We do not currently require checks through the Disclosure and Baring Service (DBS) (previously known as CRB) for our external moderators, unless required specifically to do so, as the frequency and nature of contact with learners during moderation activity is considered minimal and low risk. No moderator is allowed to have access to any learner without other appropriate adults being in attendance.



- and moderation process, and confirm the evidence of achievement meets the assessment standards.
- 2.4 In addition, they offer advice and guidance to centre staff in order to support continuous improvement. They encourage and support centres in providing the most appropriate modes of evidence collection for the learner.
- 2.5 External moderators deal directly with centres and it is the Centre's responsibility to deal directly with all learners' queries. Under no circumstances, must centres encourage or advise learners to contact us or our external moderators directly.

3 How we externally moderate

- 3.1 Moderation is planned according to the Course End Date submitted by the centre at enrolment. This Course End Date should be the date the centre anticipates the course will be finished i.e. course delivery; assessment³ and internal moderation⁴ have been completed by **all** learners unless withdrawn.
- 3.2 The centre must make **all** learners' work available for moderation.
 - 3.2.1 Work must be complete, authenticated, cross-referenced against the learning outcomes/assessment criteria, assessed and internally moderated. External moderation should not be arranged until assessment and internal moderation are complete and the centre is ready to claim learner certification.
 - 3.2.2 Each learner portfolio or piece of assessment evidence, if submitted for external moderation separately, must include the learner's signed Declaration of Authenticity⁵.
- 3.3 The external moderator will:
 - 3.3.1 confirm the date, type and requirements of moderation with the centre;
 - 3.3.2 verify assessment decisions made in line with our sampling requirements;
 - 3.3.3 carry out a quality audit of a centre's delivery, assessment and internal quality assurance procedures;

Reviewed: Jul2019 Regulatory Conditions: H2 Page 2 of 8 SEG Awards_External Moderation Policy Final 19-20

³ See Delivering and Assessing Qualifications

⁴ See Internal Quality Assurance of Qualifications

⁵ Available to download from the website



- 3.3.4 offer advice and guidance to centres on administrative procedures, physical and staff resources, and any technical issues relating to the learning outcomes and assessment criteria;
- 3.3.5 confirm requests for credit transfer and exemption where the learner has already achieved sufficient credits or qualifications that evidence prior achievement;
- 3.3.6 prepare a moderation report for the centre which includes, when appropriate, an action plan⁶ listing actions to be taken in order that the full requirements of our procedures and the qualification assessment are met;

Examples of assessment practice that are likely to lead to intervention and actions from the external moderator include but are not limited to:

- Inconsistency of assessment decisions;
- Insufficiently qualified staff;
- Assessment tasks not valid or fit for purpose;
- Poor assessment practice;
- Insufficient records;
- Authenticity of learners' work;
- Insufficient learner evidence.
- 3.3.7 follow-up action plans with centres following the release of the report.
- 3.4 Centres which fail to comply with any action plans may incur sanctions⁷ resulting in one or more of the following:
 - the requirement for additional support and moderation;
 - suspension of moderation activity;
 - suspension of learner registration/certification; or in more serious cases;
 - the suspension or removal of qualification approval/centre recognition.

4 Types of External Moderation

4.1 Centres will be approved for one of the following types of external moderation. The type of moderation will be dependent on the status of the centre and/or specific requirements of the qualification. We will always determine the type of moderation to be allocated and advise the moderator accordingly.

Reviewed: Jul2019 Regulatory Conditions: H2 Page 3 of 8 SEG Awards_External Moderation Policy Final 19-20

⁶ A provisional action plan is discussed with the centre at the time of a visit and confirmed when the final report is despatched to the centre.

⁷ Cf. ABC Sanctions Policy



4.2 External Moderation Visits

- 4.2.1 Centres will be allocated an external moderator per sub-sector (curriculum area) who will contact centre staff to arrange a mutually convenient date, time and place for the visit.
- 4.2.2 It is anticipated that a moderation visit will take 4 hours, but the sample size and issues encountered at the centre may reduce/extend this.
- 4.2.3 During the visit the centre will be expected to make available:
 - **all** assessed learner evidence for which the centre will be claiming certification;
 - personnel associated with the qualifications/units being externally moderated e.g. tutors, assessors and internal moderators;
 - learners⁸ (maximum 6) with whom the moderator can discuss delivery and assessment provision at the Centre. Where learners are unavailable centres are expected to provide their own evaluations.
- 4.2.4 The Centre is expected to inform the moderator if an arranged visit cannot go ahead as planned. We reserve the right to charge for any pre-arranged visit that the Centre cancels without sufficient or reasonable notice, and the right to invoice and require payment of visit fees before the visit takes place. Repeated cancellation of moderation may incur sanctions.
- 4.2.5 Following a visit, the centre may feedback on the external moderation process. This feedback can be through the External Moderation Report Form, separate contact with Centre Support or submitted via the website.

4.2.6 Centre responsibilities

In order to facilitate an efficient and timely moderation the Centre will be expected to complete the following once they have been given details of their External Moderator:

 to liaise with their External Moderator and determine an appropriate date and time for the visit i.e. when assessment and internal quality assurance are complete;

⁸ External Moderators will not interview learners alone. They are required to interview learners in a group or with a member of centre staff present. Learner names will not be used when submitting feedback.



- to complete the required sections (Planner Sections 4-7) of the moderation visit report form and to return this via email to the External Moderator at least 5 working days prior to the visit;
- to ensure they have met all other requirements by referring to the checklist provided when we confirm the name of the External Moderator.

4.2 Remote Moderation

- 4.2.1 Remote moderation is undertaken when a visit from an External Moderator is not required. Remote or postal moderation of assessed work is usually conducted in the following circumstances:
 - for established centres with a positive moderation record;
 - for reviewing additional samples following a visit;
 - when it is an appropriate method of moderation for the centre e.g. where there are distance learners;
 - when it is an appropriate method of moderation for the qualification e.g. language qualifications where multiple specialists are required.
- 4.2.2 Centres will be informed of the sample of evidence required by the External Moderator approximately 10 working days prior to the submitted course end date. These samples must either be:
 - forwarded⁹ to the external moderator within 10 working days after the course end date; or
 - the moderator given remote access to the centre's ePortfolio system. The centre is advised to read our guidance on eModeration and to contact us before the course has finished ensuring that any potential technical problems do not delay the moderation process.
- 4.2.3 Centre responsibilities

to liaise with their external moderator to confirm when samples will be despatched if not ready or available earlier;

⁹ If evidence is sent by post the centre is expected to bear the cost of the postage



- to complete the required sections (Planner Sections 4-8) of the remote moderation report form and to send this via email with or at the same time as the requested samples;
- to explain why samples requested have not been sent. Failure to explain why samples are unavailable will delay the process;
- to ensure you have met all other requirements by referring to the instructions provided in an email by the External Moderator. Not least to include the following with the unit evidence provided:
 - Learners' Declarations of Authenticity;
 - Assessment Summary evidence for all cohorts included in this moderation;
 - Internal Moderation Plan and Summary of internal moderation undertaken.

4.3 Additional Moderation

- 4.3.1 Following moderation there may be a requirement for additional moderation to take place. This is likely to occur where:
 - the Centre was not fully prepared and the moderation could not be completed;
 - the External Moderator has made changes to the Centre's assessment decisions which necessitates further assessment and subsequent sampling.
- 4.3.2 Centres will be charged in each case and sanctions may also be applied.

4.4 Direct Claims

- 4.4.1 Under certain conditions we will allow centre claims for certification between moderations. Please refer to our <u>Direct Claims Policy</u>
- 4.4.2 Evidence of assessment decisions and the internal moderation process will be required for review at the next moderation for all courses certificated under Direct Claims.



5 Retention of Assessment Evidence

- 5.1 Centres must retain all assessment evidence securely until external moderation has been completed and the period for appeals has elapsed.
 - 5.1.1 Centres wishing to appeal against the External Moderator's decision must retain the original evidence for any appeal requested. Enquiries or appeals against moderator decisions must be made in writing to complianceandregulation@skillsedugroup.co.uk within the timescales specified.¹⁰
- 5.2 Centres are required to keep records of assessment and internal moderation for a period of seven years. Please refer to our requirements for Centre Record Keeping on the website.

6 Malpractice and Maladministration

- 6.1 External moderators who suspect malpractice/maladministration or inequality during the external moderation process will communicate their findings directly to Compliance and Regulation in a separate report.
- 6.2 Centre staff who suspect malpractice on the part of learners or other centre staff must contact Compliance and Regulation using the Notification of Suspected Malpractice (MM2) available on the website.¹¹

7 Sanctions

7.1 Our moderators may recommend sanctions as an outcome of moderation activity where they suspect malpractice/maladministration or they consider assessment decisions to be unsafe or inadequate. Recommendations for sanctions¹² must be approved by Compliance and Regulation who will communicate which sanctions are to be applied, the reasons for those sanctions and the actions required as a result.

8 Standardisation

We may, either directly or through our External Moderators, ask for copies of learner assessment evidence for the purposes of standardisation. Centres are required to cooperate with all such requests to enable us to meet our

Reviewed: Jul2019 Regulatory Conditions: H2 Page 7 of 8 SEG Awards_External Moderation Policy Final 19-20

¹⁰ See Enquiries and Appeals Policy

¹¹ See Malpractice and Maladministration Policy

¹² See Sanctions Policy



Conditions of Recognition and to ensure that qualification standards are being met consistently across all those involved in the moderation process.

9 Quality Assurance

- 9.1 We quality assure our moderation process through a programme of self-assessment, peer observations, report reviews and customer feedback.
- 9.2 This policy and guidance is reviewed annually to ensure it continues to meet the needs of our centres and Regulators.¹³

 $^{^{13}}$ Ofqual in England; Qualifications Wales; CCEA Regulation in NI