

Policy Document: Monitoring & Auditing



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Policy Overview

Policy Purpose	The purpose of this policy is to inform THETA ETQA staff, constituents and moderating bodies of the policy, practice and process of ensuring quality provision through provider monitoring & auditing activities within the THETA sector.
Legal Basis	<p>In terms of the ETQA Regulations (R1127), Section 2(1), an ETQA “<i>shall be accredited for the purpose of monitoring and auditing achievements in terms of national standards or qualifications</i>”.</p> <p>THETA ETQA therefore acknowledges its legal right and duty to monitor and audit providers as per the South African Qualifications Authority¹</p>
Terminology	All terminology used in this policy bears the implicit meaning as stated in the policy document: ETQA0 Glossary of Terms and Acronyms
Policy Statement	Within the parameters of the ETQA Regulations , the THETA ETQA shall ensure quality of provision through Monitoring & Auditing of providers within its scope of provision.
Appeal by against Monitoring & Auditing Decisions	<p>Parameters of Appeal:</p> <p>A provider may access the THETA Appeals Procedure² should the provider or employer organization be dissatisfied with any of the following circumstances relating to the monitoring& auditing process</p> <ol style="list-style-type: none">1. Monitoring & Auditing Decision2. Monitoring & Auditing Process3. Monitoring & Auditing Team Members' conduct4. Conditional Compliance Plan - Evidence Requirements

¹ ETQA Quality Management Systems –SAQA Policy Document

² ETQA5: Appeals Policy

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Monitoring

Monitoring Approach

The THETA ETQA holds the position that **monitoring practices** must encourage and enhance **provider inclusion** and development, not **exclusion**.

The overall approach is to:

- *confirm compliance to criteria* first, thereafter
 - *identify options of development and continuous improvement*.
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Purpose of Monitoring & Auditing

The THETA ETQA monitor providers for one, or a combination, of the following reasons.

To **collect evidence** of compliance regarding³:

1. The systems put in place by a Provider to assure the quality of its services.
 2. Learning processes, Provider's competence and resources
 3. Assessment of learning by Providers of learning opportunities
 4. Assessment undertaken by external bodies (examinations and qualification awarding bodies).
 5. What has been learned, achieved, or is already known, through assessing the learner, including RPL practices
 6. The degree to which access, mobility, progression and redress have been enhanced
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³ SAQA Policy Document: ETQA Quality Management Systems

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Monitoring, Continued

Monitoring Parameters

The THETA ETQA recognizes the *inherent conflict embedded* in the roles and approach of the ETQA, in that the ETQA:

- Has a legislated mandate and statutory responsibility to ensure compliance to SAQA criteria, and
- Has an inclusive, developmental approach in all monitoring and auditing interventions.

It is therefore the policy of the ETQA to:

- Build provider capacity, and act in an advisory role, to
- Ensure full compliance to criteria and continuous improvement of practices,
- Without taking on the role of the provider and thereby quality assuring its own work.

Conditional Compliance Monitoring

After an audit has taken place and a Conditional Compliance Plan has been agreed to between the provider and the ETQA, the ETQA will monitor the provider's adherence to this Conditional Compliance Plan on a quarterly to monthly basis, as required. The following process of monitoring will take place:

No	Activity	Resources
1.	QA draws monthly Exception Report of the Electronic Development Plan 2 weeks before due date of compliance	<ul style="list-style-type: none"> • Electronic Development Plan
2.	Required provider activities are consolidated in correspondence to the provider	<ul style="list-style-type: none"> • Reminder letter
3.	Information is received from the provider, and acknowledgement of receipt is logged.	<ul style="list-style-type: none"> • Acknowledgement of receipt letter
4.	Information is forwarded to external verifier for review, <i>Or</i> Information is reviewed by the Quality Assuror.	<ul style="list-style-type: none"> • Original External Verifiers Report
5.	Results of evaluation are communicated to the provider	<ul style="list-style-type: none"> • Email
6.	Electronic Development Plan is updated by the Quality Assuror, and forwarded to provider	<ul style="list-style-type: none"> • Electronic Development Plan

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Auditing

Auditing Model

The Audit Model followed in the THETA ETQA indicates the point at which the audit is performed, and therefore the overall purpose of the audit

Auditing Point				
1	2	3	4	5
Accreditation	Programme/ RPL Evaluation	Provision Partnerships Evaluation	External Moderation	Verification

No	Audit Purpose	Method	Audit Focus
1	Accreditation	Through Phase A & B desk top review and site visit	<ul style="list-style-type: none"> • Validate QMS • Evaluate programmes • Approve and register ETD staff
2	Programme / RPL Evaluation	Through documented evidence submission	<ul style="list-style-type: none"> • Programme strategy • Assessment Strategy and guides • Related QMS and infra-structure
3	Provision Partnerships Evaluation	Through documented evidence submission	<ul style="list-style-type: none"> • Provider / Employer roles & responsibilities
4	External Moderation	Through learner file evaluation, perform sample moderations on assessment process, results, assessor performance or instrument validation	<ul style="list-style-type: none"> • Assessment result / process • Assessor performance or validate instruments used for assessment
5	Verification	At systems level	<ul style="list-style-type: none"> • strategic ETD approach (through QMS), • operational implementation (through practice) and administrative support (through documented evidence)

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Auditing, Continued

Systems Approach

The ETQA views the provider and its practices as a contextual entity within an ***integrated, holistic system of quality provision***.

The ETQA intends to focus at ***systems level*** rather than direct moderation of assessment results. Verification at systems level evaluates the results of moderation of assessments against unit standards and/or qualifications, within the greater provider context.

The foundational principles for Verification therefore remains fixed, with a particular focus / emphasis, depending on the point of verification.

Auditing Methods & techniques

The following ***Auditing methods and techniques*** are used by the THETA ETQA:

No	Method	Description
1.	Off-site Desk top evaluation	Documented evidence of the provider's strategic, operational and ETD practices are submitted for review and evaluated against set criteria within the ETQA
2.	On-site Evidence Validation	Evidence submitted for desk-top review is validated against actual practice
No	Technique	Example
3.	Sampling Framework	Random and/or targeted selection of learner records for external moderation purposes, to include <i>Probability-based</i> and <i>Non-probability</i> based selection of sampling.
4.	Document Review	Review of policies, standard forms and templates, learning material
5.	Validation	Comparison of evidence to practice

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Continued ... Auditing Methods & techniques

No	Technique	Example
6.	Verification	Evaluation of policy to process at a holistic systems level to demonstrate the concept of trueness in the policy to practice verification. ⁴ Evaluation will include the assessment of the policies and practice against a set of criteria, a value judgement based on the results of that assessment, and a sound administrative process to ensure fairness in the evaluation ⁵
7.	Interviews	Focused interviews with learners, assessors, moderators
8.	Observation	Evaluation of actual facilities, learner interaction with assessors and facilitators

Scope of Monitoring & Auditing

The scope of verification that the ETQA is mandated to exercise is as follows:

1. Organizational capacity
2. Quality Management Systems
3. Resources
4. Assessment
5. Moderation
6. Administrative support
7. Discrepancies / complaints / appeals
8. Quality provision

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⁴ Promotion of Administrative Justice Act

⁵ Promotion of Administrative Justice Act

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Auditing, Continued

Principles of Monitoring & Auditing

The following quality indicators per criteria element form the basis of the ETQA Verification scope, and is expanded in the individual verification reports according to the purpose of the verification audit

No	Criteria / Scope	Quality Indicator
1.	Organizational Capacity	<ul style="list-style-type: none"> ▪ Ratios – learner per facilitator / assessor ▪ Assessor per moderator ▪ Geographical spread ▪ Quality provision
2.	QMS	<ul style="list-style-type: none"> ▪ Organizational commitment and management ▪ Admin management ▪ Learning management ▪ Assessment Management ▪ ETD Staff Management ▪ Learnership Management
3.	Resources, facilities and Infrastructure	<ul style="list-style-type: none"> ▪ Physical ▪ Financial ▪ Administrative ▪ Human
4.	Assessment	<ul style="list-style-type: none"> ▪ Assessment & RPL - Policy, practices and process ▪ Management, review, role players ▪ Principles, instruments, access ▪ Role players competence and capacity
5.	Moderation	<ul style="list-style-type: none"> ▪ Policy, practice and process ▪ Role players competence and capacity, management ▪ Scope, impact, instruments

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Auditing, Continued

Audit Outcome

Should an Auditing Intervention show evidence of sub-standard ETD practices, a variety of outcomes may be recommended by the verifiers, depending on the severity of the **non-compliance / non-conformance**:

No	Non-compliance	Example	Outcome
1	Compliance Rating 5	<ul style="list-style-type: none"> All QMS and ETD policies & practices comply to / exceed ETQA criteria as stated 	<ul style="list-style-type: none"> Approval of continuation of practices
2	Minor Rating 4	<ul style="list-style-type: none"> Policies and practices are in place, but selected areas need improvement Training and assessment show evidence of alignment and good practice, but does not meet SAQA criteria Self assessment practices are insufficient 	<ul style="list-style-type: none"> Conditional approval of continuation of practices Development Plan
3	Medium Rating 2 or 3	Insufficient evidence of : <ul style="list-style-type: none"> programme alignment, sound assessment evidence and practices, QMS policy and practice implementation Quality provision and learner support Insufficient moderation practices 	<ul style="list-style-type: none"> Suspension Sample re-assessment External Moderation Conditional Compliance Plan
4	Major Rating 1 or 0	<ul style="list-style-type: none"> Obvious disregard to SAQA criteria for quality provision, No evidence of aligned programmes and assessment practices, QMS practices insufficient in all ETD areas 	<ul style="list-style-type: none"> Learner Salvage – retraining and assessment Certification withdrawal De-accreditation

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Outsourcing of monitoring activities

The THETA ETQA reserves the right to **outsource the activities** of monitoring & auditing to an external verifier, which may include the following:

- Desk-top review of evidence submitted for review
- Site visit for verification purposes
- Conditional Compliance monitoring and update

The outsourced activities do **not** at any stage transfer the accountability for Monitoring & Auditing to the outsourced partner. THETA ETQA remains accountable for monitoring and auditing of provision as per the ETQA Regulations.

Qualitative & Quantitative Review

The THETA ETQA shall conduct a **quantitative and qualitative** review of all monitoring activities on a quarterly or bi-annual basis, depending on need and demand, to determine:

- Trends and patterns in monitoring results
- Required capacity building interventions
- Continuous improvement requirements

A Monitoring Report will be published to all THETA members and stakeholders after each Verification Review.

ETQA Review of Monitoring Activities

During the review the operational efficiency and effectiveness of the Verification System will be interrogated to determine the following:

1. Rigour of verification process and administrative audit trail
2. Authenticity of verification results and instruments
3. Integrity of verification data

Any change requests to the Verification Process and Instruments as a results of this Review will be communicated to all THETA External Verifiers before implementation of such changes.

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ETQA Operational Principles

Principles of Monitoring & Auditing

All monitoring, auditing, verification and validation activities are done on the foundation of establishing the following embedded principles⁶:

No	Principle	Discussion
1	Learner Support	<ul style="list-style-type: none"> Learner support in the learning and assessment process is evident
2	NQF Alignment	<ul style="list-style-type: none"> Programmes and assessment practices are aligned to the principles of the NQF, and to the unit standards contained within the THETA qualifications
3	Quality Provision	<ul style="list-style-type: none"> Provider infrastructure, programmes and ETD practices support a concept of ethical, quality provision
4	Sustainability	<ul style="list-style-type: none"> Learning practices are sustainable within a contextual, quality driven environment
5	Compliance & Improvement	<ul style="list-style-type: none"> Provider show sufficient evidence of compliance to SAQA criteria and guidelines, and clear potential for improvement of Generally Accepted ETD Practices
6	System Credibility and Validity	<ul style="list-style-type: none"> The credibility of the NQF systems and its qualifications is protected by the validity of the provider systems

Frequency of M&A Interventions

The frequency of **Monitoring / Validation** interventions, and/or **Verification Audits** may be dependent on the following factors:

- Routine schedule: every 6 – 12 months
- ETQA discretion
- Discrepancies / complaints / appeals

External Providers

The THETA ETQA reserves the right to perform monitoring & auditing activities on any provider who provides delivery / assessment of THETA qualifications for certification purposes, whether the provider is accredited by THETA ETQA, registered with THETA but accredited elsewhere, or falls within the FET / HET quality assurance bodies' mandate.

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⁶ Extract from SAQA principles for the purpose of this policy – please refer to SAQA: "NQF, An Overview" for full details

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ETQA Operational Principles, Continued

Role Players The ETQA recognizes the following *internal role players* in Monitoring & Auditing Interventions:

No	Role Player	Area of Involvement
ETQA Role Players		
1.	ETQA Manager	<ul style="list-style-type: none"> • Approves accreditation decisions • Validates M&A outcomes • Ensures compliance with due process • Advises on and approves learner salvage interventions
2.	ETQA Advisor	<ul style="list-style-type: none"> • Advises QA's on M&A outcomes • Ensures compliance to due process • Facilitates learner salvage interventions • Manages external verifiers
3.	Quality Assuror	<ul style="list-style-type: none"> • Builds capacity with providers • Perform desk-top reviews and on-site validations • Manages providers' development plans and evidence submissions • Recommends M&A outcomes • Performs accreditation reviews and recommends outcome
4.	Programme Administrator	<ul style="list-style-type: none"> • Builds capacity with providers • Evaluates programmes, assessment and moderation practices of providers • Recommends programme status for accreditation / extension purposes
5.	Learnership Coordinator	<ul style="list-style-type: none"> • Performa liaison role between employer and provider • Audits the learner support relationship • Recommends M&A interventions to the ETQA
6.	ETQA Admin Support (PA, LSO)	<ul style="list-style-type: none"> • Maintain provider correspondence regarding M&A activities • Maintain provider database and DoC records for certification purposes

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ETQA Operational Principles, Continued

Contracted Capacity

Due to the size and diversity of the THETA provider base, the THETA ETQA will make use of contracted verifiers and consultants to perform the operational functions of:

- External Moderation
- Verification
- Programme Evaluation

Accreditation activities will **not** be outsourced, and it will remain the responsibility of the ETQA members to perform desk-top reviews and site visits for accreditation purposes.

External Moderation will **always** be outsourced, as this activity is essentially a provider activity, and not an ETQA function, but will be utilized as a sample audit technique by the ETQA when required.

Despite the use of Consultants for verification functions, the **accountability** in terms of the due process followed and decision of the outcome of monitoring and auditing interventions remain the responsibility of the ETQA .

No	Role Player	Area of Involvement
External Role Players		
7.	External Moderator	Perform a moderation of assessments on request of the THETA ETQA
8.	External Verifier	Perform a systems verification on request of THETA ETQA
9.	External Programme Evaluator	Evaluates a learning programme strategy and assessment strategy for accreditation / MoU / extension purposes

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ETQA Operational Principles, Continued

Contractor Management

All contracted role players within THETA will be selected and appointed by the ETQA Manager, and contracted for a particular scope of work.

All Monitoring & Auditing role players, whether contracted or not, are **subject to:**

1. A Code of Conduct
2. A Confidentiality Agreement with regards to provider information
3. Declaring any conflict of interest in any verification

A **review of performance** will be done on all M&A role players, based on:

- Adherence to ETQA due process
 - Administrative accuracy and compliance
 - Provider feedback and consensus
-

External Moderation

External Moderation⁷ is viewed by the THETA ETQA as a **sample audit technique** to establish the following:

1. Checking that the systems required to support the provision of learning programmes across the institution / learning site are appropriate and working effectively
 2. Providing advice and guidance to providers regarding assessment practice
 3. Maintaining an overview of provision across providers
 4. Checking that all the staff involved in assessment are appropriately qualified and experienced
 5. Checking the credibility of assessment methods and instruments
 6. Checking internal moderation systems
 7. Through sampling, monitoring & observing assessment processes and learners' evidence to ensure consistency across providers
 8. Checking assessors decisions
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⁷ SAQA: Criteria & Guidelines for Assessment of NQF registered Unit Standards and Qualifications

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Provider Operational Principles

Internal Monitoring & Auditing

It is an ***inherent duty*** of the accredited provider to ensure the quality of provision within this own organization through sound and regular internal moderation.

Internal Moderation Purpose⁸:

THETA ETQA requires providers to conduct moderation in their organizations in a structured, scheduled way, that allows for all of the following ***purposes of moderation*** to be met:

1. Validation of assessment instruments
2. Verifying of assessment results through evidence submission
3. Monitoring of assessment process
4. Monitoring and auditing of the assessor performance

Capacity Building⁹

THETA ETQA undertakes to provide capacity building in the ***purpose, process and resources*** used in ***internal moderation*** practices, with a view of enhancing quality provision and making providers self-sustainable in terms of quality assuring their own practices

Role of the Provider in ETQA Monitoring & Auditing

The provider is required to comply with the THETA ETQA due process for monitoring & auditing by:

1. Preparing the evidence requested for submission and evaluation
 2. Submitting all required evidence timeously as per any reasonable request from the THETA ETQA
 3. Arrange for access of the M&A Team to the required premises, people and documented evidence
 4. Implement and report on the implementation of the agreed Conditional Compliance Plan
 5. Follow the formal channels of Appeal in the event of a dispute regarding a M&A outcome
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⁸ Refer to ETQA11: Registration of Moderators and Verifiers

⁹ Refer to Criteria & Guidelines document: THETA ETQA (Crit&Guide6): Moderation Practices

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Provider Operational Principles, Continued

Process of Verification

The following process assumes that accreditation is in place, and has a focus on the verification of assessment, moderation and related systems.

TIMEFRAME	PROCESS	OUTPUT
6 – 8 weeks before visit	<ul style="list-style-type: none"> ▪ Draw exception report from database on certification requests ▪ Liaison with learnership department on concerns, ▪ Review learner / provider complaints 	Database Report Learnership Request for verification Learner complaints
4 weeks before visit	<ul style="list-style-type: none"> ▪ Letter to provider informing them about the visit and evidence required for desktop verification. ▪ Ask provider for acknowledgement of receipt. 	Letter to provider Letter back from provider
4 weeks before the visit	<ul style="list-style-type: none"> ▪ Forward the list of evidence required for the day and criteria the verification team will be using ▪ Check that provider has received the criteria, and ask if they need any explanation ▪ Also reminder to provider for the information required for desktop verification 	EV Report Record all contact with provider in provider file Reminder email/phone call
2 weeks before visit	<ul style="list-style-type: none"> ▪ Forward desktop info to the verifier or QA. 	Providers boxes
10 days before the visit	Desktop verification: <ul style="list-style-type: none"> ▪ Check on accreditation status ▪ Evaluate complaints received ▪ Moderate assessments ▪ Verify policies ▪ Compile a desktop verifications report 	Phase A/B Emails etc External Moderators Report Verifiers policy checklist Desktop Verifiers Report

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Provider Operational Principles, Continued

Continued ... Process of Verification

2 days before visit	<p>Preparation for Visits</p> <ul style="list-style-type: none"> ▪ THETA file ready: <ul style="list-style-type: none"> * Agenda for visit * External moderators report * Desktop report * Copy of EV report * Electronic version of the all documents required ▪ File prepared for provider. Same as THETA FILE ▪ If an additional QA present at visit Same as THETA FILE 		<p>THETA File/Disk</p> <p>Provider File</p> <p>QA File</p>
Day of Visit	<ul style="list-style-type: none"> ➤ THETA introduction and purpose of visit ➤ Verifier introduces documents ➤ Discuss Desktop report briefly ➤ THETA deal prepare action plan ➤ Verifier to prepare the report ➤ 		
AFTER VISIT	<ul style="list-style-type: none"> ➤ Finalize reports ➤ Print report for THETA file ➤ Submit all reports electronically ➤ Forward final reports to providers 		<p>Final report</p> <p>Final report</p>
FIVE DAYS AFTER VISIT			

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Policy Maintenance

Quality Assurance

This particular process will be monitored annually by the ETQA Department, using the following indicators

Indicators	Description
Process Audit	<ul style="list-style-type: none">○ A self Evaluation will be done on a yearly basis through the random selection of providers that have been audited to establish due process and administrative support○ An Internal Self Evaluation of the status and accuracy of the Electronic Development Plan for providers.○ Number and nature of appeals received against the monitoring & auditing activities of the ETQA
Electronic Conditional Compliance Plan audit	
Internal Self Evaluation	
Appeals against the ETQA Monitoring & Auditing process and outcomes	

Policy Review

An annual review will be done of the policy and position stated herein by the ETQA Manager, and recommendations will be reviewed, documented and implemented.

Non-Conformance

The following actions will be regarded as a non-compliance:

ETQA:

- Non-compliance to the criteria and/or process of monitoring & Auditing as described in this policy.

Disciplinary action will be taken against any ETQA member who does not follow the due process.

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