Regulation for Internal and External Moderation

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Regulation for Internal and External Moderation

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Purpose	To prescribe the minimum requirements for internal and external moderation at Stellenbosch University
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Validity	The English version of this regulation is the operative version, and the Afrikaans version is the translation.

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[1] Owner: Head(s) of Responsibility Centre(s) in which the regulation functions.

[2] Curator: Administrative head of the division responsible for the implementation and maintenance of the regulation

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<p align="center">**Essence of this Regulation**</p>

Moderation is a well-established peer review practice that should be conducted in a collegial, constructively critical, and non-threatening manner. Faculties and departments ensure that internal moderators are appointed for *all* modules and external moderators for every exit-level (final year) module.

The minimum requirements for internal and external moderation at Stellenbosch University are as follows:

An **internal moderator** should consider the assessment plan of a module *before* it is implemented and verify that it is fair, valid, reliable and practicable and adheres to the principles and provisions of the *Assessment Policy* (2021). Internal moderation includes the peer review of a representative selection* of the summative assessment tasks of a module *before* they are distributed to students and a sufficient sample** of assessment products *after* they have been completed by students and graded by the assessor(s), but before the final mark is released.

* A representative selection of summative assessment tasks to be moderated would typically contribute to ≥40% of the final mark.

** A *sufficient* sample of assessment products would vary according to class size. The minimum number of assessment products to be fully moderated should typically equal the *square root of the class size* ($\sqrt{class\ size}$), with a further cursory check of *at least* the same amount. A sufficient sample should include all borderline cases, i.e., pass/fail, pass/distinction and exemption from/entrance to professional examinations.

After the assessment products of an exit-level module have been graded, and internally moderated, the **external moderator** should consider whether the assessment process in its entirety has been credible and completed in an ethical way. To document their findings, the module coordinator, internal moderator and external moderator must submit a combined report to the departmental chair. A template for such a report is provided as an addendum to this *Regulation* and may be adapted by faculties to be fit for purpose.

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1. Introduction

1.1 As part of the culture of quality assurance and enhancement at Stellenbosch University, continuous self-evaluation and peer review of the assessment plan and process of all modules and programmes is standard practice.

1.2 Peer review takes place through the:

    a. Internal moderation of the assessment plan and –process of all modules (per semester/year),

    b. External moderation of the assessment process of all exit-level modules (per semester/year),

c. External examination of all master's degree theses and doctoral dissertations,

d. Cyclical evaluation of all departments, and professional academic and administrative support service (PASS) environments, and

e. Regular academic renewal activities (either periodically or according to a fixed cycle). These are informed by the Council on Higher Education's *Criteria for Programme Accreditation* (2004), the *Quality Assurance Framework* (2021) and applicable Higher Education Practice Standards. Some programme review, redesign, renewal and evaluation activities include the following:

  - Professional programmes (undergraduate and postgraduate) are evaluated and accredited by external professional bodies by means of the criteria and procedures they prescribe.

  - Postgraduate programmes not accredited by an external professional body are evaluated and peer-reviewed as part of the home department's self-evaluation, scheduled according to the University's quality assurance cycle.

  - Undergraduate programmes not accredited by a professional body are evaluated and peer-reviewed before implementation and continually reviewed and renewed by programme teams, as coordinated by the home department, and supported by the home faculty. (When an undergraduate programme is situated within a home department, it is typically evaluated and peer-reviewed as part of the home department's self-evaluation, scheduled according to the University's quality assurance cycle.)

  - National reviews are conducted periodically by the Council on Higher Education. These typically focus on programmes but could also evaluate qualifications.

1.3 In terms of 1.2 above, the terminology, principles, and provisions for (a) internal and (b) external moderation at Stellenbosch University are set out in this *Regulation*. The procedures for (c) external examinations are described in the *Yearbook Part 1*, while the (d) cyclical evaluations and (e) regular academic renewal activities are described in the *Policy for Quality Assurance and Enhancement at Stellenbosch University* (2019).

1.4 This *Regulation* is specifically informed by the institutional policies that relate to the teaching-learning-assessment process at Stellenbosch University, including the *Teaching and Learning Policy* (2018), currently under review, *Language Policy* (2021) and the *Policy for Quality Assurance and Enhancement at Stellenbosch University* (2019). In particular, this *Regulation* is aligned to the *Assessment Policy* (2021), which marks the adoption of an institutional "flexible assessment" approach that enhances student learning.

1.5   This *Regulation* takes into account the possibility of future periods of disruption by stating the guiding principles in detail, should agility be needed in the implementation of provisions.

1.6   During the implementation of this *Regulation*, it is anticipated that institutional progress will be made on the following: the standardisation of module frameworks, a wider adoption of SUNLearn and other technology platforms, a further deepening of curricular and pedagogical decoloniality, and an increased use of generative artificial intelligence in the setting and completion of assessment tasks, and the grading of assessment products.

2.   Implementation

2.1   This *Regulation* applies to the entire University in relation to the assessment plans and -processes of modules offered as part of academic programmes.

    a.   As of 2005, internal moderation of all modules is compulsory for all academic programmes offered by the University.

    b.   Also, as of 2005, external moderation of all exit-level modules is compulsory for all academic programmes offered by the University.

2.2   The Deputy Vice-Chancellor: Learning and Teaching oversees the implementation of this *Regulation* and ratifies the final marks of all semester and year modules on behalf of Senate, after considering the consolidated external moderation reports from faculties.

2.3   The Dean of each faculty monitors the internal and external moderation reports submitted by the departmental chairs (or similar, such as directors of centres, institutes and schools) and submits a consolidated faculty report to the Deputy Vice-Chancellor: Learning and Teaching.

2.4   Faculty boards, on behalf of Senate, have the delegated responsibility to appoint internal moderators for all the modules offered by its home departments (or similar, such as centres, institutes and schools) and, in addition, external moderators for all the exit-level modules offered.

    a.   Faculties may institute additional faculty- or alternative programme-specific provisions (e.g., set by professional bodies), if the provisions comply with the principles set out in this *Regulation*.

    b.   Faculty- and programme-specific provisions should be tabled at the Committee for Teaching, Learning and Assessment for discussion and Senate for approval.

2.5 Home departments (or similar) are responsible for all the practical arrangements relating to internal and external moderation. This includes:

   a. Discussing this *Regulation* with academic staff and communicating the essence of it to students.
   b. Nominating internal moderators for all undergraduate and postgraduate modules, and external moderators for every exit-level module offered by the department.
   c. Establishing a collegial, constructively critical, and non-threatening atmosphere within which internal moderation is conducted.
   d. Ensuring that security is maintained when assessment tasks are presented to internal and external moderators.
   e. Ensuring that security and anonymity, where feasible, is maintained when assessment products are moderated.
   f. Budgeting for the costs of the external moderation of the department's exit-level modules, in line with the University's standard tariffs for the remuneration of external moderators. A higher honorarium may be paid in cases where it is motivated to and approved by the Dean.
   g. Capturing the marks on the student information system.

2.6 The Registrar's division institutes adequate measures to ensure the integrity and security of the moderation process. Adequate time should be allocated in the University Almanac to accommodate internal and external moderation as part of the timetabling of assessment periods.

2.7 The Registrar's division is responsible for the release of students' final marks on the student information system, after the marks have been ratified by the Deputy Vice-Chancellor: Learning and Teaching. All marks recorded on SUNStudent for a given semester are provisional until the final marks have been ratified by the Deputy Vice-Chancellor: Learning and Teaching, on the dates given in the Almanac. However, departments and similar entities are encouraged to record on SUNStudent the provisional marks as soon as they are available after internal moderation to give students access to these provisional marks (*cf.* Yearbook Part 1, 6.4.13).

3.   Terminology

Pertaining to this *Regulation,* the following terms are explained within the Stellenbosch University context.

3.1 **Assessment** is defined in the University's *Assessment Policy* (2021) and refers to the systematic evaluation of students' abilities to demonstrate their having achieved the learning goals set for a curriculum. This can include a

variety of tasks, products, outputs or competencies used to gather evidence and compare the students' performance against the set assessment criteria and learning outcomes. The *Assessment Policy* (2021) situates assessment as an integral part of a learning and teaching process that constructively aligns learning outcomes, learning opportunities and assessment practices.

3.2 An **assessment opportunity** refers to a specific instance or occasion when a student has a chance to demonstrate their knowledge, skills or abilities.

3.3 An **assessment plan** (or strategy) incorporates several assessment opportunities that maintain an appropriate balance between formative and summative assessment.

3.4 An **assessment process** as provided for in the *Assessment Policy* (2021) includes the following stages:

   a. The expectations of and standards for learning as well as the criteria for evaluating assessment opportunities are clear and available.
   b. Evidence is gathered to compare student learning to these expectations, standards and criteria.
   c. The evidence is analysed and interpreted.
   d. The information gathered in this manner is used to document, explain and/or enhance teaching and student learning.

3.5 An **assessment product** as used in this *Regulation* refers to, e.g., an answer script, essay, laboratory investigation, portfolio, project, oral, seminar, task or tutorial completed and/or submitted by a student(s) for the purposes of assessment.

3.6 An **assessment task** refers to, e.g., the question paper or assignment as drafted by the assessor(s) for the purposes of assessment.

3.7 **Exit-level modules** are the final-year modules of a programme, such as a Bachelor's degree or Diploma, and include all the modules of a one-year programme, whether a postgraduate programme (Postgraduate Diploma, Honours or structured Master's degree programme) or an undergraduate programme (Higher Certificate, or Advanced Diploma). (All non-final year modules, e.g., first- and second-year modules of a three-year Bachelor's degree programme, are **non-exit-level modules**.)

3.8 **Moderation** is the quality assurance and enhancement process during which the assessment plan and process of a module are checked, considered, improved if/as needed, and validated. Nationally, "moderation" is defined by the South African Qualifications Authority (SAQA, 2014) as

"internal and external verification that an assessment system is credible and that assessors and [students] behave in an ethical way; and that assessments are fair, valid, reliable and practicable".

The difference between internal and external moderation, as defined and prescribed by the Council on Higher Education in its *Policies on the Recognition of Prior Learning, Credit Accumulation and Transfer, and Assessment in Higher Education* (2016), is as follows:

a. **Internal moderation** is an aspect of assessment whereby a staff member who was not directly involved in setting the assessment task or question(s) in the assessment task despite teaching within a module, reviews the internal assessment process. For summative assessment, especially where more than one assessor/marker is involved, internal moderation should be undertaken to ensure the reliability of the assessment process and marks.

b. **External moderation** must provide for a system whereby students' learning achievements at the exit-level of a qualification are moderated by appropriately qualified external academics [or professionals] who have been appointed according to clear criteria and procedures and who conduct their responsibilities in terms of clear guidelines. External moderators are recommended by the examining academic department and are independent experts in their fields.

3.9 A **moderation process** typically follows a phased approach to allow for the comparison of judgements about the standards that are set in the assessment tasks *before* the tasks are given to students, and to ensure that the agreed-upon standards have been applied consistently and accurately *thereafter*, when the assessment products are being/have been graded.

a. A first phase would typically involve a close reading of the assessment plan and a representative selection of summative assessment tasks by an internal moderator. This is followed by a collegial conversation with the module coordinator to discuss whether any improvements could be made. For an exit-level module, faculties may choose to include an external moderator in this phase as well, but it is not prescribed as a minimum requirement.

b. A second phase could take on different forms, depending on the nature of the assessment tasks, the number of assessment products, and how marks are allocated. Typically, it involves an internal moderator reviewing a sufficient sample of assessment products to check whether the assessment process has been credible and completed in an ethical way. A small number of assessment products, typically equal to at least the $\sqrt{class\ size}$, will be reviewed in detail, e.g., by marking them in full,

while a similar or larger number will be moderated through a cursory check. If the module is offered at the exit-level of a programme, then an external moderator would also review the assessment process and submit a written report to the module coordinator. However, in some cases, the external moderation could be replaced by an external examination, e.g., in cases where students complete or perform an assessment task for, e.g., visual arts, music or drama.

c. Although only two phases are described above, a moderation process could include more phases (*cf.* 7.1 (a), Tables 1-3).

3.10 A **moderator** is a person, apart from the assessor, who is appointed (*cf.* 7.2) by the University to assure the standard of the assessment tasks and its accompanying marking framework and response exemplars, and for marking a representative sample of assessment products.

a. An **internal moderator** is a staff member of the University who has been officially appointed by a faculty board (on behalf of Senate) to facilitate the internal moderation of the assessment plan and -process of a specific module. Internal moderators could be academic or professional academic and administrative support service staff, post-docs, retired faculty members or extraordinary appointments.

b. An **external moderator** is a competent person who is not a staff member of the University and who has been officially appointed by a faculty board (on behalf of Senate) to facilitate the external moderation of a module. External moderators should be unattached to the University and exclude extraordinary appointments.

4.   Purpose

The purpose of this *Regulation* is to prescribe the minimum requirements for internal and external moderation at Stellenbosch University.

5.   Aims

The aims of this *Regulation* are to:

5.1   Meet the national regulatory requirements related to internal and external moderation, as stipulated in the Council on Higher Education's *Criteria for Programme Accreditation* (2004) in terms of criterion 13. Also, to align the University's peer-review practices with the priorities of the Council on Higher Education's *Quality Assurance Framework for Higher Education in South Africa* (2021), regarding the development of "quality standards and guidelines … by appropriate Communities of Practice to serve as a frame of

reference [for all internal and external quality assurance] activities and the basis for … reviews, developments, improvements and enhancements".

5.2   Ensure that the moderation practices at the University are informed by the principles and aligned to the provisions of the following institutional policies:

   a. *Assessment Policy* (2021), to promote assessment that enhances student learning.
   b. *Language Policy* (2021), to promote multilingualism in a reasonably practicable and pedagogically sound manner.
   c. *Policy for Quality Assurance and Enhancement at Stellenbosch University* (2019), to promote a culture of quality enhancement.
   d. *Teaching and Learning Policy* (2018), currently under review, to promote an enabling learning-centred institutional environment where quality teaching-learning-assessment can flourish.

5.3   Provide assurance to students that their assessments adhere to the principles and provisions (including the "Framework for effective assessment") of the *Assessment Policy* (2021) and that their assessment results are reliable and correct.

5.4   Set out the appointment procedure, and roles and responsibilities of internal and external moderators, and the regulatory control and oversight by departmental chairs, Deans, and the Deputy Vice-Chancellor: Learning and Teaching.

5.5   Provide a standardised template for moderation reports, to be adapted by faculties and approved by the Committee for Teaching, Learning and Assessment, if/as needed.

6.   Principles

The following principles have emerged as good practices from institutional and other higher education policy and management documents:

6.1   Moderation is regarded as an important quality assurance mechanism that ensures the quality control of assessment processes, and enables the quality enhancement of teaching-learning-assessment practice. As such, the principles described in the *Policy for Quality Assurance and Enhancement at Stellenbosch University* (2019) inform this *Regulation.* These include:

   a. *Accountability and transparency:* All moderation processes should be adequately defined, communicated, transparent and well-documented

to ensure that the University accepts the highest level of responsibility for its actions.

b. *Excellence:* All moderation processes must allow academics the freedom to measure their assessments against the highest standards of integrity, renewal and relevance.

c. *A holistic and systemic approach:* Moderation processes ensure that departments can account for the quality, appropriateness and integrity of their assessments – not only in isolation, but in an integrated manner across the entire curriculum, aimed at producing well-rounded graduates with attributes and competencies that are personally, professionally and socially valuable.

d. *An enabling culture:* Moderation is a reflective practice that should be supported by a participatory environment that enables module coordinators, assessors and internal moderators to engage in open and honest discussion and to explore diverse ideas and tensions constructively, critically and creatively. Information contained in ~~external~~ moderation reports is intended for internal use only and must be treated with due sensitivity and confidentiality, with recognition of, and care for the wellbeing of all staff. Yet, it could also be used for further self-reflection and feed into departmental self-evaluation and/or academic renewal processes.

e. *Simplicity:* Even though moderation processes must be comprehensive and thorough, it should not be excessively onerous or time-consuming.

f. *Sustainability:* Moderation should help module coordinators and assessors to consider the overall impact of their assessment processes and whether these processes place undue stress on the economic, ecological or social wellbeing of staff, students and the environment.

g. *Transformation:* Moderation should help module coordinators and assessors to identify and avoid possible biases, and must be employed to enhance an inclusive institutional culture, and to consider how the assessment plan in question is relevant to the University and impacts on society.

6.2 The adoption of a continuous, consensus-seeking and sense-making approach to moderation, and the provisions of the *Policy for Quality Assurance and Enhancement at Stellenbosch University* (2019) apply to this *Regulation* as follows:

a. *Self-evaluation as a process for reflection and professional learning*: The basis of any internal or external moderation process is a critical self-reflection by the module coordinator and/or assessor(s) themselves with a view to obtain insight into their assessment plan and -processes

and identify areas for improvement and/or change of their thinking and practice.

b. *Peer review and benchmarking to ensure accountability, transparency and excellence:* Internal moderation provides for consistency and comparability of grading standards for different assessments within a module, and different assessment processes within a department and/or a programme and, potentially, across different departments and/or faculties. In addition, external moderation provides for comparability across institutions and ensures a sectoral standard is agreed-upon for exit-level modules. The comparability of standards of student performance across, e.g., different sites or modes of delivery, or the marks allocated by different assessors, should be used to create a shared understanding of teaching-learning-assessment good practices.

c. *Implementation of and feedback on improvement actions:* Moderation processes are intended for improvement, change and professional learning. Therefore, the recommendations contained in verbal feedback and written reports should be reflected on, considered thoroughly and acted upon.

d. *Continuity and adaptability:* A standardised template is attached as addendum to this *Regulation* to ensure optimal consistency of moderation processes across the University. However, a measure of flexibility is allowed for additional questions to be included in moderation reports.

e. *Evidence-based rigour*: Moderators should be supplied with sufficient information to make informed judgements about the quality of an assessment plan and -process of a module, both in terms of the assessment tasks and the grading of assessment products as well as formative reports as and where applicable.

f. *Student and stakeholder participation:* Departmental chairs and programme leaders should interpret moderation reports in conjunction with institutional student and graduate feedback, and employability reports. Faculties could consider appointing industry stakeholders as external moderators, where appropriate.

g. *A systematic, continuous quality management system:* Quality control, assurance, and enhancement activities are conducted on a continuous basis, as well as on set times according to fixed periods of assessment. As such, internal moderation reports may feed into external moderation reports and in turn, external moderation reports should feed into programme- and departmental self-evaluation and peer reviews, where appropriate.

6.3   As a peer review mechanism of the assessment plan and -process, internal and external moderation should be guided by the principles described in

the *Assessment Policy* (2021). This includes that an assessment plan should demonstrate the following (while taking professional body requirements into account, if/as needed):

a. An integrated approach to student learning.
b. The use of formative feedback that enhances student learning.
c. Constructive alignment of the teaching-learning-assessment practices with the learning outcomes of the module.
d. A considered strategy, making use of multiple methods of assessment.
e. Justifiable choices regarding assessment methods used.
f. A strategy that does not privilege one form or purpose of assessment over another.

6.4 Furthermore, the provisions of the *Assessment Policy* (2021), including the *Framework for effective assessment,* should inform moderators' reports, i.e., in terms of the validity, authenticity, reliability, educational impact, academic integrity, transparency, fairness, achievability, and learning-centred feedback of the different assessment plans and -processes.

6.5 In terms of provisions 7.1 and 7.5 of the *Language Policy* (2021), internal moderation affords home departments the opportunity to promote multilingualism by checking the consistency of how Afrikaans, English and isiXhosa terminology are used, and assessed.

6.6 Internal and external moderation should promote the professionalisation of academics in their teaching role and contribute to the scholarship of their teaching-learning-assessment practice. As such, the principles of the *Teaching and Learning Policy* (2018), currently under review, also inform this *Regulation* and should be used to guide the progression of the professional learning pathway of academics from reflective practitioners to scholarly teachers, teaching scholars and leaderly teaching scholars.

7. Provisions

The minimum requirements and prescriptions below are derived from the principles underlying this *Regulation.* The provisions are grouped according to the management processes and appointment procedures that apply to both internal and external moderation, followed by a section on internal moderation and external moderation, respectively.

7.1 The **management of moderation processes** is the responsibility of home departments, with regulatory control and oversight by the faculty board and the Dean.

a. Faculties and home departments, as well as programme leaders and module coordinators, should contemplate the timing and scheduling of their peer review and moderation processes to ensure that the teaching-learning-assessment of modules and programmes are considered in a coherent, systematic and integrated manner. Some phases to be considered, are listed in the tables below – with phases 1, 2 and 4 being compulsory for *all* modules, and for every exit-level module phase 5 as well.

Tables 1-3: Timing and scheduling considerations for peer review and moderation

TABLE 1: Collective sense-making and reflection *before* the appointment of moderators				
	Peer review phase	**Timing**	**Responsible role-players**	**Task(s) and/or deliverable(s)**
0	Contemplating module feedback	Before the assessment plan is finalised	Module coordinator, lecturers and possibly student(s)	Consider and reflect on student-, lecturer-, alumni- and employer feedback, and moderation reports related to the existing module that have a bearing on assessment and moderation practice. Update the assessment plan in the draft module framework, if applicable.

TABLE 2: Collective sense-making and reflection *after* the appointment of moderators				
	Peer review phase	**Timing**	**Responsible role-players**	**Task(s) and/or deliverable(s)**
1	**Internal moderation of assessment plan**	Before module framework deadline	Module coordinator and internal moderator	Have a collegial conversation about the assessment plan of the module before finalising and uploading the module framework to SUNLearn. Identify which summative assessment tasks will be internally moderated and consider the recommendations of the previous moderation reports, if applicable.
2	**Internal moderation of identified summative assessment task(s)**	Before the identified assessment task is distributed to students	Module coordinator and internal moderator; in some cases, also external moderator	Internal moderator peer reviews the assessment tasks and rubrics, marking guides, model answers and assessment criteria, and identifies areas for improvement in conversation with the module coordinator who considers the advice and makes the adjustments, as needed. External moderators may also be approached for input, if prescribed.
3	Pre-grading meeting	After an assessment opportunity, before grading commences	Module coordinator and all the assessors and marking assistants	Module coordinator calibrates how grading will be done and marks assigned by discussing the assessment tasks and rubrics, marking/grading guides, memoranda, model answers and assessment criteria with the assessors (and marking assistants, if applicable).
4	**Internal moderation of identified summative assessment products**	After the grading of assessment products, before the marks are finalised	Assessor(s) and internal moderator	The internal moderator moderates a sufficient sample (typically $\sqrt{class\ size}$) of assessment products in full, with a further cursory check as agreed upon with the module coordinator to verify that the correct standard has been applied and that marks have been calculated and captured correctly for the assessment product. Any recommended changes are discussed, and marks are adjusted by the module coordinator.

| 5 | **External moderation of assessment process** | After the internal moderation has been concluded | Module coordinator and external moderator | The external moderator receives and contributes to the partially completed combined report from the module coordinator and considers the assessment process in its entirety, also moderating a sufficient sample (typically $\sqrt{class\ size}$) of assessment products in full, with a further cursory check to verify that the assessment process was credible and completed in an ethical way. |

TABLE 3: Collective sense-making and reflection *after* moderation process has been completed			
Peer review phase	**Timing**	**Responsible role-players**	**Task(s) and/or deliverable(s)**
6	Benchmarking within a programme and across modules	Annually, when the programme team meets	Programme team, led by programme leader, with module coordinators	A programme team considers the assessment plans, moderation reports and student feedback of all the modules forming part of the programme, identifies areas for improvement, and proposes changes and steps for improvement/enhancement to be considered by different home departments.
7	Programme review, redesign and renewal	Periodically or every six years as part of the QA cycle	Programme leader, with support from the faculty	Depending on the scope of the review and renewal, a programme leader could register a project within the faculty and apply for institutional support to redesign an existing programme and/or modules.
8	Departmental self-evaluation and peer review	Every six years, or according to professional body site visits	Programme leaders and module coordinators in the department	The self-evaluation committee collates all the external moderation reports received during the review period in the portfolio of evidence of the self-evaluation report, and includes a reflection on the main findings and actions emanating from them in the section about teaching-learning-assessment.

b. In all cases, faculties should seek to implement and manage a moderation process that is fit for purpose. Although this *Regulation* standardises the internal and external moderation of the assessment process for all modules across the entire University, it also acknowledges the great variety of modules that are offered in various programmes and in various formats. Some of these present substantial challenges in terms of assessment and moderation, e.g., instances where external moderators in a specific subject field may not be readily available, or where big classes lead to many assessment products to be marked and moderated within a short space of time. To afford faculties the required flexibility in terms of implementing this *Regulation*, the Committee for Teaching, Learning and Assessment may be approached for exceptions in relation to the extent of a moderation process, provided that the faculty's programme committee has considered the request and formulated alternative measures in keeping with the principles of this *Regulation.* In this regard, a risk-based approach should be followed to identify the most appropriate peer review and moderation phases to be

implemented, and to motivate for the use of, e.g., smaller sampling sizes, where justified.

c. Utmost care should be taken to ensure a reliable and secure process is followed when assessment information/documentation is being shared, e.g., by taking into account the permissions settings granted to external moderators when giving them access to electronic systems, and the protocols followed by departments and the Registrar's division when hard copies of, e.g., assessment products are sent by courier. The divisions for Information Governance, Information Technology, and the Registrar's division could be consulted in this regard.

d. The implementation of improvement actions remains the responsibility of the module coordinator and the home department of the module.

e. The responsibility rests with the departmental chair (sometimes shared with a programme leader) to examine the moderation reports and verify the following before the final mark is captured on the student information system:

- Internal moderation has taken place,
- If the module is offered at an exit-level, external moderation has taken place and that the moderation reports are kept on record,
- Cognisance had been taken of any adjustments made,
- Improvement actions previously identified have been implemented,
- In cases where discrepant results have been received from the internal and/or external moderators, these were dealt with according to the faculty's resolution process (*cf.* section *8. Conflict settlement* below).

7.2 The **appointment procedure** for internal and external moderators is as follows:

a. Internal and external moderators are nominated by home departments, based on their expertise, and appointed by a faculty board on behalf of Senate. Departmental chairs, in consultation with the module coordinators or assessor(s), make the recommendations and are responsible for the appointment arrangements, if approved.

b. Moderators should have a qualification on the same or preferably at a higher National Qualifications Framework (NQF) level than that of the module they are moderating, taking professional body regulations into account, where applicable.

c. Moderators possess the requisite competence and academic standing in the subject field(s) in which they are moderators.

d. Internal moderators are usually academic staff who are situated within the same home department of the module, but could also be a University staff member from a cognate discipline within or beyond the faculty. Internal moderators could be academic or professional

academic and administrative support service staff, post-docs, retired faculty members or extraordinary appointments.

    e. External moderators should be unattached to the University and exclude extraordinary appointments. External moderators are not appointed in a fixed capacity or as temporary staff of the University.

    f. No person may be the sole internal or external moderator for the same module for longer than three consecutive years; however, if the person forms part of a panel of three or more moderators, then the period could be extended to six years.

    g. Home departments (or similar) may request for an exception(s) to the above regulations (b) to (f), if motivated to and approved by the faculty board. E.g., in the case of postgraduate programmes with several specialist modules that have only a few registered students in every module, a single external moderator may be asked to moderate a related group of modules (e.g., modules that fall in a particular subject field) as a whole, and not every module separately.

7.3   **Internal moderation** applies to all modules.

    a. Before a module framework is finalised and uploaded to SUNLearn, the module coordinator and internal moderator should discuss the assessment plan, consider any proposed improvements and identify a representative selection of summative assessment tasks to be internally moderated. A representative selection of summative assessment tasks to be moderated would typically contribute to ≥40% of the final mark.

    b. Before a summative assessment task that has been selected for moderation is distributed to students, an internal moderator should peer review the assessment task and rubrics, marking guides, model answers and/or assessment criteria and, if applicable, identify areas for improvement in conversation with the module coordinator. This discussion should include:

      - Formulations of the assessment tasks are clear and unambiguous, and the translated terminology has been checked for consistency by, e.g., the Language Centre.

      - Assessment tasks are constructively aligned with the intended learning outcomes of the module. These assessment tasks should be clear in terms of the assessment criteria (e.g., a marking scheme, memorandum, or rubrics) and the weighting of the mark allocation.

      - Assessment tasks make use of appropriate methods of assessment that support an integrated approach to student learning and can be completed within the allocated time.

      - Principles of effective assessment (validity, authenticity, reliability, educational impact, academic integrity, transparency, fairness,

achievability, and learning-centred feedback) have been implemented in a considered way.

c. After each of the selected summative assessment tasks has been completed by students and the assessment products graded by the assessor(s), an internal moderator should study the assessment products, consider the assessment process, and communicate suggestions for adjustments to the marks and/or other improvements to the module coordinator. An internal moderator should verify the following:

- Grading of the assessment products was fair and reasonable, usually by means of reviewing a sufficient sample (typically $\sqrt{class\ size}$), of assessment products in full, with a further cursory check of *at least* the same amount.
- Assessment products of those students whose marks are near the borderline of 50% (fail/pass) and/or 75% (distinction) and/or exemption from or entrance to professional examinations have been marked appropriately.
- Marks have been calculated and recorded in an accurate and reliable way.

7.4 **External moderation** applies to all exit-level modules.

a. *After* the assessment products of an exit-level module have been marked and internally moderated, the external moderator should consider whether the assessment process in its entirety has been credible and completed in an ethical way.

b. The external moderator should study a selection of the assessment products, consider the assessment process, and communicate suggestions for adjustments to the marks or improvements to the assessment plan (for the next intake of the module), by completing a combined report (see the template included as an addendum to this *Regulation*), of which some sections would have been completed by the module coordinator and internal moderator already.

c. An external moderator should verify the following:

- Grading of the assessment products was fair and reasonable, usually by means of reviewing a sufficient sample (typically $\sqrt{class\ size}$), of assessment products in full, with a further cursory check of *at least* the same amount, taking into account the internal moderation that has already taken place.
- Assessment products of those students whose marks are near the borderline of 50% (fail/pass) and/or 75% (distinction) and/or exemption from or entrance to professional examinations have been marked correctly.
- Marks have been calculated and recorded in an accurate and reliable way.

8. Conflict settlement

8.1 In cases where discrepant moderation information, recommendations or views have been submitted, e.g., by internal and external moderators, the faculty concerned heads a resolution process to be conducted by an independent third party nominated by the faculty.

8.2 In cases where a faculty requires further clarification, the faculty refers the relevant discrepancy to the Deputy Vice-Chancellor: Learning and Teaching, for guidance on a resolution process.

9. Regulatory control

9.1 The Deputy Vice-Chancellor: Learning and Teaching is the **owner** of this *Regulation* and oversees the implementation, monitoring, and review thereof.

    a. The Deputy Vice-Chancellor: Learning and Teaching has standing delegated powers from the Executive Committee of the Senate to approve all assessment results, i.e., final marks, on behalf of the University before the information for the graduation ceremonies is processed.

    b. The Deputy Vice-Chancellor: Learning and Teaching is responsible for the following, to:

- Check the faculty reports submitted by the Deans,
- Take note, where applicable, of the progress on the improvement actions previously identified,
- Take note of the planned improvement actions, as supported by the deans, and
- Approve the academic results for the particular assessment period(s).

9.2 The Senior Director: Learning and Teaching Enhancement is the **curator** of this *Regulation.* The curator coordinates the review of the *Regulation* every six years, or sooner if deemed necessary.

9.3 This *Regulation* is implemented by departmental chairs and monitored by the Deans (or Vice-Deans: Learning and Teaching).

    a. The departmental chair (or similar, such as the director of a centre, institute or school) collates the assessment results and all the moderation reports for all the modules offered by the home department (or centre, institute or school) and submits a report to the Dean.

    b. The Dean is responsible to submit a report as prescribed by the Deputy Vice-Chancellor: Learning and Teaching that confirms that:

- The moderation of all modules in the faculty adhere to this *Regulation.*
- The recommendations, mark/grade adjustments and improvement actions reported by the departmental chairs have been documented.
- Where applicable, the improvement actions previously identified, have been implemented.
- Future improvement actions will be followed-up by the home departments and monitored by the departmental chairs.

9.4   The Committee for Teaching, Learning, and Assessment is the institutional committee that considers exceptions and resolves any conflicts that may arise from this *Regulation*. The Committee also initiates the review of this *Regulation* as needed and recommends it to Senate for approval.

9.5   Institutional support and guidance on the implementation of this *Regulation* is provided by the Division for Learning and Teaching Enhancement and the Registrar's division.

9.6   This *Regulation* takes effect from the date by which Senate approves it, and should be reviewed every six years, or sooner if deemed necessary.

a.   The implementation date is determined by Senate and should allow faculties the time to adapt their current moderation practices in line with this *Regulation.*

b.   A measure of flexibility is allowed for additional questions to be included in moderation reports, for which the template is included as addendum to this *Regulation.* The template may be interpreted and refined by faculties on a continuous basis, in line with good practice and with proper faculty oversight.

9.7   In case of non-compliance with this *Regulation*, the normal faculty processes apply, which could be escalated to the Committee for Teaching, Learning, and Assessment or the Deputy Vice-Chancellor: Learning and Teaching, if needed.

10. Institutional policies

The four institutional policies that inform this *Regulation* are as follows:

#	Stellenbosch University policy	Status
1.	*Assessment Policy*	Approved in 2021
2.	*Language Policy*	Approved in 2021
3.	*Policy for Quality Assurance and Enhancement*	Approved in 2019
4.	*Teaching and Learning Policy*	Approved in 2018. Under revision

11. National policy and discussion documents

Some national policy and discussion documents that inform this *Regulation* are listed below:

#	National document	Status
1.	*Criteria for Programme Accreditation*	CHE document, approved in 2004, revised and approved in 2012
2.	*An integrated approach to Quality Assurance in Higher Education: A discussion document*	CHE discussion document, 2017
3.	*National Policy and Criteria for Designing and Implementing Assessment for NQF Qualifications and Part-Qualifications and Professional Designations in South Africa*	SAQA policy, 2014
4.	*Policies on the Recognition of Prior Learning, Credit Accumulation and Transfer, and Assessment in higher education*	CHE policy, approved in 2016
5.	*A Quality Assurance Framework (QAF) for Higher Education in South Africa*	CHE document, approved in 2021

12. Addendum: Moderation report template

A generic template is provided as addendum to this *Regulation* for the purposes of recording the findings of a moderation process, and may be adapted by faculties as needed, *cf.* 5.5, 6.2 (d) and 9.6 (b).

Moderation Report[*]

This report is the culmination of different peer review phases of the moderation process, as described in the *Regulation for internal and external moderation* (2024) and should be completed for all exit-level modules.

Sections A and D should be completed by the module coordinator, and section C by the external moderator. Section B could be completed either by the module coordinator in consultation with the internal moderator or by the internal moderator.

A. General information

Request to Stellenbosch University module coordinator
Please read the *Regulation for internal and external moderation* (2023) and complete the following information before submitting this report to the internal or external moderator.

A1. Module information

Module name(s) and code(s)	
NQF level and credits	

A2. Access to documents

Please provide a hyperlink(s) or explain how/where the module framework, all the assessment tasks, a sufficient sample (typically $\sqrt{class\,size}$) of assessment products, the mark sheet, and previous moderation reports should be accessed.

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[*] This is a generic template for the entire University and may be adapted by each faculty, *cf.* the *Regulation for internal and external moderation* (2024), sections 5.5, 6.2 (d) and 9.6 (b).

A3. Response to previous moderation report(s)

What were the main findings of the previous moderation report(s) and how have these been addressed?

Section B: Internal moderation

Request to Stellenbosch University module coordinator and internal moderator

Internal moderation is conducted in a collegial, constructively critical and non-threating manner. Please verify that the module coordinator and internal moderator (a) considered and discussed the assessment plan of the module and determined that it is fair, valid, reliable and practicable, (b) reviewed a representative selection of summative assessment tasks (including, e.g., rubrics and marking guides) before they were distributed to students, and (c) moderated a sufficient sample of graded assessment products (typically $\sqrt{class\ size}$) to ensure that the mark allocation was fair and reasonable, and calculated and recorded in an accurate and reliable way.

B1. Internal moderator

Name of internal moderator	
Department/Division	

B2. Moderation of the module framework and assessment plan

What aspects of the module framework and assessment plan elicited some conversation? Please verify that the assessment plan was deemed to be fair, valid, reliable and practicable, and comment on any improvements that were proposed and implemented (e.g., related to the weighting of the assessment tasks; the balance between formative, summative and other types of assessment, or ways to increase opportunities for learning-centred feedback).

B3. Moderation of a representative selection of assessment tasks

Which summative assessment tasks were selected for moderation and why? Please verify that they contribute(d) to ≥40% of the final mark, and comment on any improvements that were proposed and implemented (e.g., related to the clarity of formulations, the standard set, the appropriateness of assessment methods, rubrics and marking guides, constructive alignment with the intended learning outcomes, and the promotion of academic integrity, etc.). Were there any ideas on improving the authenticity and relevance of the assessment tasks?

B4. Moderation of sufficient sample of assessment products

Please explain how the sampling of assessment products for moderation was done, and comment on any adjustments made to the marks. In terms of the assessment process, please verify that the standard set by the assessors was appropriate, and that the mark allocation was fair and reasonable, and calculated and recorded in an accurate and reliable way.

B5. Concerns, observations or suggestions for improvement

If any concerns were raised, or observations or suggestions for improvement made about the module in general (e.g., related to the decoloniality of the module content, parity of student success, how the learning opportunities are structured, the quality of the module framework, or the assessment tasks set for this module), please explain what adjustments have been made or will be considered in the future.

Section C: External moderation

Request to external moderator

Please consider whether the assessment process to date has been credible and completed in an ethical way. This can be verified by (a) commenting on the internal moderation process, (b) peer reviewing a sufficient sample (typically $\sqrt{class\ size}$) of assessment products in full, and (c) conducting a cursory check of at least $\sqrt{class\ size}$ to verify that marks have been calculated and recorded in an accurate and reliable way. Please pay special attention to the assessment products of those students whose marks are near 50% (fail/pass) and/or 75% (distinction), as well as those that obtained the highest and lowest marks, respectively.

C1. External moderator

Name of external moderator	
University/HE institution	
Highest qualification	

C2. The assessment- and moderation process

Reading the previous sections of this report, studying the module framework, looking at the assessment tasks and products, and all the documents made available, are you satisfied that you can make an informed judgement about the quality of this module, and its assessment- and moderation processes? If so, what is your impression of the standard of this module? Please verify that the assessment plan and moderation process were appropriate and adequate, and that the module coordinator and internal moderator correctly identified and addressed the most pertinent quality issues.

C3. External moderation of assessment products

Please verify that the assessment process was credible and completed in an ethical way. You could comment on the following:

a. How did you and the module coordinator decide on the summative assessment tasks to be moderated?
b. Were the assessment criteria, weighting and mark allocation clear?
c. Are you satisfied with the standard set by the assessors, i.e., that the grading was fair and reasonable, also for the products of those students whose marks are near the borderline of 50% and 75%?
d. What grade adjustments would you propose?

e. Are you satisfied that the marks have been calculated and recorded in an accurate and reliable way?

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C4. Final observations, concerns or suggestions for improvement

Do you have any concerns about the module, the assessment plan or process, or the internal or external moderation process? Are there any matters that require urgent attention? Do you have any suggestions for improvement/enhancement going forward, or observed good practices to be commended?

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C5. Confirmation

I hereby confirm that I externally moderated the assessment process of the module.

External moderator signature	
Date signed	

Section D: Reflection and improvement

Request to Stellenbosch University module coordinator

Given the moderation feedback above, please identify any good practices to share, or quality risks or improvement areas to be addressed and monitored at departmental/faculty level.

D1. Improvement areas

If the internal or external moderator raised any concerns, please explain what adjustments will be made to the marks before the results are processed. Are there any improvement actions that will be addressed before or when the module is offered again?

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Module coordinator signature	
Date signed	