



QCTO AUDIT CHECKLIST · Edition 2026

Audit-ready, every cohort.

A practical, item-by-item audit prep guide for South African Skills Development Providers — QCTO, SETA, NLRD, MIS, and POPIA — built around the questions external moderators actually ask.

QCTO

SETA

NLRD

MIS

POPIA

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Built in South Africa · 2026

HOW AUDITORS THINK

Audits don't test your system. They test your evidence.

Whether it's a QCTO verification visit, a SETA monitoring session, or an NLRD data-quality audit, the question is always the same: 'show me'. This checklist is built around the seven evidence domains every accredited SDP needs to be ready in.

7

EVIDENCE DOMAINS

60+

AUDIT DATA POINTS

0

MISSING POE TOLERANCE

100%

MIS-READY EXPORTS

THE PRINCIPLE

If it isn't evidenced, it didn't happen.

Auditors don't credit verbal explanations. Every claim — that an assessor was qualified, that a moderator signed off, that a learner consented — needs an artifact attached, dated, and accessible in seconds. That's the bar.

THE SEVEN EVIDENCE DOMAINS

1. Provider governance & accreditation
2. Learner registration & demographics
3. PoE — Portfolio of Evidence
4. Assessment design & execution
5. Internal & external moderation
6. Submissions: NLRD, QCTO MIS, SETA
7. Recap — sample audit pack

Provider governance & accreditation.

The first thing auditors look at is whether you should be running the programme at all — accreditation status, scope, and the people authorised to sign things. Get this wrong and nothing else matters.

- 1 Current QCTO accreditation certificate, in scope**
Certificate visible, valid, and matches the qualifications you're delivering. Programme codes on the certificate match the programme codes on every learner record.
- 2 Registered Skills Development Facilitator**
Named SDF, registered with the relevant SETA, contactable. Their training and CV evidence is on file and current.
- 3 Quality Management System documented**
Your QMS document is current, signed by the accountable officer, and reviewed within the last 12 months. Version-control trail visible.
- 4 Constituent agreements with SETAs**
Memoranda with the SETAs whose qualifications you offer — current, signed, scope explicit.
- 5 Premises, equipment, and OHS evidence**
Site addresses match accreditation, OHS compliance evidence current, simulation/practical equipment lists tied to qualifications.
- 6 Information Officer for POPIA designated**
POPIA mandates a registered Information Officer. Named, contactable, trained on incident-response timelines (72 hours for material breaches).

Learner registration & demographics.

Auditors will pull a sample of learners and ask 'show me everything'. That means identity, demographics, consent, and movement — all reconciled to one canonical record per learner.

- 1 Single canonical learner record**

One record per learner. No duplicates across cohorts. ID/passport, full names (in DHA spelling), DoB, gender, race, language, disability status.
- 2 LURITS / SAQA ID**

Where applicable, validated against SAQA records. Issued or matched at registration, not a week before submission.
- 3 Demographic data per NLRD spec**

Race code, gender code, disability status, citizenship — all in NLRD-compliant format. Free-text fields are not acceptable.
- 4 Consent for personal data processing**

POPIA consent captured at registration, dated, signed (digitally or physically), and revocable. Stored against the learner record.
- 5 Programme registration with code**

Each learner is registered against a specific qualification ID, with start date, expected end date, and funder (NSFAS, employer, self-funded, SETA bursary).
- 6 Movement & status changes**

Withdrawals, deferrals, transfers, completions — every status change has a date, a reason code, and the person who recorded it. Re-registrations are tracked end-to-end.

Portfolio of Evidence — the heart of QCTO.

QCTO audits live or die in the PoE. A single learner missing one piece of evidence can hold up an entire cohort's results. Digital PoE, structured by unit standard, with sign-off chains visible per item — that's the bar.

- 1 PoE structured by unit standard / module**

Every PoE indexes evidence under the unit standard or module it satisfies. Auditors should never have to hunt for the evidence covering a specific outcome.
- 2 Every required evidence type collected**

Workplace-based assessment, written assessment, practical demonstration, oral, portfolio task — all covered per qualification specification, none missing.
- 3 Authenticity statement signed per learner**

Learner attests the work is theirs, dated, with assessor counter-sign. POPIA consent renewed if it extends original capture scope.
- 4 Date, location, and assessor recorded per item**

When was the evidence captured, where, who supervised — every item, no exceptions. Verbal claims don't credit at audit.
- 5 Digital PoE with version trail**

If evidence is amended (e.g. moderation finding addressed), the prior version is preserved with amendment reason. Auditors see the full chain.
- 6 Long-term retention beyond certification**

PoE retained per QCTO retention policy (typically 5 years post-certification). Storage is POPIA-compliant and access-logged.

Assessment design & execution.

Auditors check both that the assessment was valid, and that the person assessing was qualified to do so. Both halves matter equally.

- 1 Assessor registered and current**
ETDP-SETA or qualification-specific assessor registration current at the date of every assessment. CV and registration evidence on file.
- 2 Assessment instruments approved**
Every instrument (test, project brief, observation rubric) approved by an internal moderator before use. Approval evidence dated and on file.
- 3 Assessment plans visible per cohort**
Each cohort has an assessment plan — what gets assessed, when, by whom, against which outcomes. Deviations are documented with reason.
- 4 Marking criteria & memos versioned**
Memos used for assessment are versioned, dated, and tied to the cohort. A change mid-cohort triggers a documented justification.
- 5 Results capture with full audit trail**
Each result records: assessor, date, instrument, raw score, scaled score (if applicable), and any moderation amendments — all in chain.
- 6 Special-needs accommodations evidenced**
Where applicable: assessor decision, accommodation granted, evidence captured under the same terms, outcome tracked separately if required.

Internal & external moderation.

Two layers — and both have to be evidenced. Internal moderation is a continuous discipline. External moderation is the gate before submission.

COMMON FINDINGS

- ✘ Moderator and assessor are the same person
- ✘ Moderation done after submission, retroactively
- ✘ Moderator not registered against the qualification
- ✘ Sample size too small to be representative
- ✘ No documented moderation report per cohort

AUDIT-READY POSTURE

- ✔ Independent internal moderator named per qualification
- ✔ Moderation runs continuously alongside assessment
- ✔ Registration & CV evidenced for every moderator
- ✔ Sample meets QCTO sampling guidelines (10–20%)
- ✔ Cohort-level moderation report on file pre-submission

WATCH OUT FOR

External moderation isn't a rubber stamp.

QCTO-appointed external moderators have full authority to reject a cohort's results if internal moderation evidence is weak. Treat external moderation as a verification of internal discipline — not the start of the moderation process.

NLRD, QCTO MIS, and SETA reporting.

The output of everything above is data — and that data has to land in the right format, in the right system, by the right deadline. Three streams: NLRD, QCTO MIS, SETA.

- 1 NLRD packaging from live data**
Learner achievements packaged in NLRD format, generated from the live operational records — never rebuilt by hand. Field-level validation runs before export.
- 2 QCTO MIS submission cadence**
Per-cohort MIS submission with full assessment + moderation trail. Validation against the QCTO MIS schema runs pre-submission.
- 3 SETA reporting per agreement**
Different SETAs require different cadences and formats — bake the timetable into the submission calendar so nothing falls through the cracks.
- 4 Certification recommendation chain**
From assessor recommendation → internal moderation → external moderation → QCTO submission — every step dated, signed, and retrievable per learner.
- 5 Submission rollback & resubmission**
When QCTO returns findings, the resubmission addresses each finding with a documented amendment, preserving the original submission as historical record.
- 6 End-of-cohort archive pack**
After certification, the full cohort artefacts (PoE, assessments, moderation, submissions, certificates) get archived as a single retrievable package.

RECAP

The audit pack on one page.

When QCTO calls and asks for evidence, you should be able to assemble the following in under an hour. If you can't, work backwards from this list.

- 1 Accreditation evidence**
Certificate, scope, SDF registration, QMS, MoUs.
- 2 Learner master records**
One record per learner; identity, demographics, status changes.
- 3 PoE per learner**
Indexed by unit standard, every required evidence type, authenticity statement signed.
- 4 Assessment evidence**
Assessor registration, approved instruments, results with audit trail, accommodations.
- 5 Moderation evidence**
Internal + external moderator registration, sampling rationale, cohort report.
- 6 Submission history**
NLRD, QCTO MIS, SETA — every submission archived with version trail and findings.
- 7 POPIA artefacts**
Consent per learner, IO designation, access logs, retention policy.

Make audit-prep a non-event.

skillsYMS keeps every artefact on this list live and retrievable as a routine output of normal operations. Book a 30-minute walkthrough on a real SDP cohort.

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