

## Appeals Board Report

### MED.E.A – Digital Institution for the Mediterranean, Europe and Africa, formerly known as Pegaso International

#### Introduction

An external quality assurance audit at Pegaso International (currently legally known as MED.E.A. - Digital Institution for the Mediterranean, Europe and Africa) was carried out between 14<sup>th</sup> and 18<sup>th</sup> February 2022, following which the MFHEA's appointed audit panel compiled a report with its findings and conclusions. On 6<sup>th</sup> October 2023, an MFHEA appointed panel, carried out a Follow-Up visit at the institution to verify the extent to which recommendations identified by the original audit panel were being implemented. The outcomes of this visit were detailed in a report which was sent to the institution for feedback. Upon reviewing the report, Pegaso International (PI) alleged that the Follow-Up Report contained factual inaccuracies. Following their feedback, the MFHEA revisited the Report and resubmitted to the institution an edited version.

Following the issuing of this second Follow-Up Report, the institution invoked its right to an appeal as per law.

The provider's grounds of appeal were sent to the CEO of the MFHEA, Dr Rose Anne Cuschieri, in a letter dated 18<sup>th</sup> March 2024 and include:

- KR1 "involving teaching staff in general and all stakeholders in a more profound way"
- KR3 "An assessment of the effectiveness of the QA officer has not been carried out"
- MR3 "...very little interaction between learners and teachers/tutors took place. In the Ph.D. programmes the student/student interaction could be strengthened. For other levels no students were interviewed"
- MR4 "the panel could not establish if these internships are carried out"
- KR5 "For the Bachelor and Masters programmes, the panel holds the position that further improvement is needed"
- KR8 "The panel did not see evidence that the reviewers and assessors active in the assessment process are facilitated in learning from and with each other"
- KR11 "...an English language course could not be observed in every single curriculum"
- KR14 "The institution should do more to show high quality employership ... PI should take a more proactive role itself"
- KR17 "more internal communication would further strengthen...."

The MFHEA appointed an Appeals Board to evaluate the Pegaso International (currently legally known as MED.E.A – Digital Institution for the Mediterranean, Europe and Africa) plea, as per the standard operating procedure. To avoid unnecessary confusion throughout the report, the institution will still be referred to as Pegaso International, since all prior documentation/reports refer to the entity with that name.

The outcomes and conclusions found in the report below are the result of the evaluation, considerations and reflections carried out by the Appeals Board.

## Appeals Board members

The following appointments were made to the Appeals Board:

Dr Robert Cassar (PhD) – Chairperson  
Dr Achim Hopbach (PhD) – Peer Reviewer  
Ms Furtuna Mehmeti – Student Peer Reviewer

## Role of the Appeals Board

The Appeals Board had the task of analysing the evidence that the petitioner had submitted in support of its grounds, and subsequently determining whether to:

- dismiss the appeal; or
- uphold appellants' arguments (in full or partially); or
- order that a new evaluation be conducted at the expense of the MFHEA.

## The Appeal

### Documented Evidence

The Appeals Board was presented with the following documents and resources:

- reports submitted by the audit panel,
- correspondence between the provider and the MFHEA,
- evidence submitted by the provider prior to the quality assurance audit and following the Follow Up exercise,
- legislation (<https://mfhea.mt/legislation/>),
- quality assurance documentation (<https://mfhea.mt/publications-2/>).

### Appeal Basis

- **Key Recommendation 1** - PI should ensure strategic documents are developed in a truly participative manner, involving both internal and external stakeholders, within 9 months of publication of this report.
- **Judgement (Follow-Up)** - To the panel, it is clear that students and external stakeholders were invited to be part of the strategic process. From what the panel has seen, there is some room for improvement, for instance, in involving teaching staff in general and involving all stakeholders in a more profound way.

The Appeals Board notes that PI took several actions to address Key Recommendation 1, namely;

1) Opinion Survey System for Students and Graduates:

PI implemented an opinion survey system among students and graduates, using questionnaires related to teaching and organisational aspects of study courses. The Appeals Board believes that this initiative demonstrates a significant commitment to gathering feedback for quality improvement.

2) Involvement of Companies and External Stakeholders:

PI extended its feedback system to involve companies in sectors related to the educational offerings of the institution. The Appeals Board believes that this is indicative of an effort on behalf of the institution to align its educational programmes with industry demands.

3) Commitment to Feedback Monitoring:

PI has committed itself to continuous monitoring of its feedback system, ensuring immediate and accurate data collection with mandatory student response.

The Appeals Board notes that while all of the above are important steps in the right direction, there are still areas where improvements could be made by the institution to fulfil its obligations to this recommendation. As indicated in the outcomes of the Follow-Up exercise itself, while PI has made tangible efforts to involve stakeholders, there are considerable opportunities to enhance the level of participation and engagement, especially among teaching staff and other internal stakeholders.

Also, the Appeals Board believes that the absence of formal minutes from stakeholder meetings indicates a need for a more structured and formal feedback collection process.

The Appeals Board concurs with the outcomes of the Follow-Up process and consequently dismisses the institution's arguments against the MFHEA's judgement. PI has only partially fulfilled its obligations vis-à-vis this recommendation. While they have developed strategic documents in a participative manner involving internal and external stakeholders as well as initiated important feedback mechanisms with students, graduates and external entities, there are still areas for improvement as indicated above.

The Appeals Board would also like to point out that the institution has appealed on the basis of lack of agreement with the Authority appointed panel's judgement, and not to statement of fact. The Appeals Board notes that an appeal against a judgement can only be upheld if the assessment is inadequate, inconsistent, and/or arbitrary. The Appeals Board concluded that this was none of the above.

A more structured stakeholder engagement process, which includes formal documentation of meetings and deeper involvement of all relevant parties in the strategic document development process, would ensure a more comprehensive and inclusive approach in fulfilling this recommendation.

- **Key Recommendation 3** - Pegaso International should monitor the QA Officer's role and responsibilities and conduct a thorough assessment of their effectiveness, within 12 months of publication of this report.
- **Judgement (Follow-Up)** - The panel observed a mental model of the requirements of the QA Officer in the institution's top management. At the same time, these requirements have not been clarified on paper, other than very minimally in the Appointment Decree ("...supervision and coordination of PI QA Office."). An assessment of the effectiveness of the QA Officer has not been carried out.

The Appeals Board notes that PI took various steps to address this recommendation. From a human resources management perspective, PI appointed an Internal Quality Assurance Manager with considerable experience in the field. Additionally, they engaged an external consultant who is an expert in QA procedures, which aligns with the MFHEA guidelines and procedures.

While such actions are not directly related to the successful achievement of Standard 1, they suggest a commitment on their end to ensure expertise and adherence to quality standards.

The Appeals Board concurs in principle with PI's argument that working on improving one's internal procedures to ensure the effectiveness and efficiency of established Quality Assurance norms and practices is as important as evaluating the performance of the Quality Assurance Officer.

Nevertheless, the Appeals Board would like to point out that there seems to be a discrepancy between the institution's actions and the specific recommendation. While there is a conceptual understanding of the QA Officer's role within the institution's top management, this understanding was not clearly defined in written documentation apart from minimal details in the Appointment Decree.

The key concern highlighted in this recommendation is the absence of an assessment of the effectiveness of the QA Officer's role not of the internal procedures in general, which was a specific requirement outlined in the Follow-Up Report. Hence, it is clear to the Appeals Board that PI may not have fully met the obligation of conducting a thorough assessment of the QA Officer's role and effectiveness within the specified timeframe.

While PI took steps to address the recommendation by appointing experienced personnel and engaging external expertise, they fell short of fully meeting the requirement to assess the effectiveness of the QA Officer. The lack of a formal assessment within the stipulated timeframe indicates a gap in fulfilling the obligation outlined in the Follow-Up Report. For the reasons above the Appeals Board dismisses the institution's argument and basis for appeal.

- **Mandatory Recommendation 3** - PI shall strengthen the interaction between student-teacher and student-student by including live sessions, within 3 months of publication of this report.

- **Judgement (Follow-Up)** - The interaction between students and teachers is somewhat at the low end of the spectrum. On the one hand, this seems to be fitting given the delivery method of distance learning. The guidelines coming from PI shaping this interaction are clear and mostly implemented. On the other hand, the panel thinks there is room for further enhancement in this area. According to some students, very little interaction between learners and teachers/tutors took place. In the PhD programmes the student-student interaction could be strengthened. For other levels, no students were interviewed.

The Appeals Board notes that Pegaso International took various steps to address this recommendation. Amongst other things, the institution has introduced policies such as the *Guidelines for interactive teaching and relative tools*. The institution also made efforts to brief teachers on the use of such policies and instruments by, for example, the transmission of a video tutorial exemplifying how to activate the relevant tools. The Appeals Board notes substantial progress in this regard.

Nevertheless, the Appeals Board would like to draw attention to the fact that the judgement in the Follow-Up Report is based mainly on interviews with PhD students. The Follow-Up panel states that only PhD students were interviewed, hence their judgement was only based on the feedback they obtained from them. In its judgement, the Follow-Up panel took into account all material that was submitted by PI; and the appellant did not bring forward new arguments.

The Appeals Board would also like to point out that the institution has appealed based on lack of agreement with the Authority appointed panel's judgement, and not to statement of fact. An appeal against a judgement can only be upheld if the assessment is inadequate, inconsistent, and/or arbitrary. The Appeals Board concluded that this was none of the above.

While PI has taken appropriate steps to address the recommendation, the institution was not able to demonstrate that it had fully satisfied what was being asked of it, particularly concerning the group of PhD students. The Appeal panel concurs with the judgement of the Follow-Up panel on both fronts, that is, the fact that significant progress had been made and that at PhD level more progress could be made.

For the reasons above the Appeals Board dismisses the institution's argument and basis for appeal.

- **Mandatory Recommendation 4** - PI shall ensure there is sufficient attention paid to the internship of students in individual programmes, within 6 months of publication of this report.
- **Judgement (Follow-Up)** - For the Masters and PhD programmes, the panel understood that the students are working in the field of their studies and that these activities are part of their (research) process. For the Bachelor students, PI provided the panel with internship agreements. Unfortunately, the panel could not establish if these internships are indeed carried out.

The Appeals Board observes that PI has undertaken measures to address this recommendation. PI reported that it has signed an agreement with NSTS to facilitate internships, providing practical training aligned with the Bachelor students' academic specialisations, currently anticipated to be in informatics, administration, and civil engineering. PI and its industry partners have agreed on the programme schedule and target outcomes, with industry partners appointing a mentor, and satisfaction being monitored and certified by the partners' officials. The Appeals Board also notes that the professional practice of Masters and PhD students is regarded as practical experience equivalent to internships.

While PI demonstrated that it had taken relevant measures at the Bachelor level, the Follow-Up panel was unable to confirm the implementation of the agreements in question. PI did not present additional information or documentation to substantiate its claims, leaving the panel without the necessary evidence to verify the actions taken. As a result, the Appeals Board finds itself unable to reach any new conclusions based on the available information. Therefore, the Appeals Board dismisses the institution's argument and basis for appeal, as the lack of concrete evidence prevents any further assessment of the claimed measures' effectiveness and implementation.

- **Key Recommendation 5** - PI should ensure supervisors are trained to lead the process of supervision, within 6 months of publication of this report.
- **Judgement (Follow-Up)** - For the PhD programmes, the panel observed sufficient attention for supervisors. For the Bachelor and Masters programmes, the panel holds the position that further improvement is needed. Adapting the document 'Supervisor Responsibilities' for usage with other students than doctoral students, would probably be a very good step.

The Appeals Board notes that PI has taken various steps to address this recommendation by adopting a series of relevant policies. Specifically, the institution has implemented comprehensive guidelines for the supervision of doctoral theses, ensuring that the processes and standards for guiding doctoral candidates are clearly defined and systematically followed. Additionally, PI has integrated supervision into its CPD courses, providing structured training and development opportunities for supervisors. This inclusion ensures that supervisors are well-equipped with the latest methodologies and best practices in doctoral supervision, thereby enhancing the overall quality and consistency of the mentorship provided to doctoral students.

Nevertheless, the Appeals Board would like to emphasise that the Follow-Up panel did not limit its deliberations and its recommendation to supervision at PhD level but that the respective guidelines apply only to PhD level. Concerning Bachelor and Master levels, PI has made the claim that the CPD courses about supervision apply to all programme levels equally. No evidence of this was at the disposition of the Follow-Up panel to ascertain it.

While PI's measures to address the recommendation are appropriate with regard to PhD programmes it becomes clear that progress is less significant at Bachelor and Master levels.

Therefore, the Appeals Board dismisses the institution's argument and basis for appeal.

- **Key Recommendation 8** - There must be a peer reviewer or peer assessor included in the process to support learning development, within 6 months of publication of this report.
- **Judgement (Follow-Up)** - The panel did not see evidence that the reviewers and assessors active in the assessment process are facilitated in learning from and with each other.

The Appeals Board notes the number of actions taken by the institution to ensure that the assessment process is quality-assured as dictated by Standard 4.

The actions taken by PI demonstrate a comprehensive approach to fostering peer review and assessment within the learning environment:

1. **Appointment of Coordinating Tutors:** By appointing coordinating tutors within each degree programme, PI has established dedicated individuals responsible for organising and monitoring interactive sessions. This is evidenced in both the institution's staff manual and Internal Quality Assurance document. This initiative aims to facilitate peer review and assessment, ensuring that students receive meaningful feedback and support from experienced educators.
2. **Implementation of Interactive Teaching Guidelines:** PI developed and disseminated guidelines for interactive teaching to lecturers and supervisors. These guidelines provide a structured framework for integrating peer review and assessment into the learning experience, promoting collaborative and engaging educational practices.
3. **Engagement with Technology and E-Learning Platforms:** PI's implementation of support tools on their e-learning platform reflects a commitment to leveraging technology for peer involvement. By incorporating interactive features into the online learning environment, PI enhances student engagement and facilitates peer-to-peer interaction and feedback.
4. **Involvement of Administration Management:** PI involved administration management in the process of registering feedback and suggestions from students. This inclusion aims to streamline feedback collection and response mechanisms, ultimately benefiting the overall operational effectiveness of the institution by fostering continuous improvement based on stakeholder input.

The Appeals Board acknowledges that through these actions the institution is shaping the interaction between students and teachers through clear guidelines and the appointment of coordinating tutors. The appointment of coordinating tutors, implementation of interactive teaching guidelines, and utilisation of technology for interactive sessions are positive steps toward meeting the recommendation.

While there is still room for development, in particular concerning strengthening student-student interaction in higher-level programmes, and facilitating learning among reviewers and assessors to maximise the impact of peer involvement in supporting learning development, the Appeals Board notes that what is currently there is enough to ensure the successful accomplishment of the recommendation, submitted in the Follow-Up Report. By embracing these strategies, PI is fostering a dynamic and supportive learning environment which is conducive to academic success and continuous improvement.

For the reasons above, the Appeals Board upholds the institution's argument and basis for appeal, and recommends the MFHEA upgrade the judgement to 'Meets Requirements'.

- **Key Recommendation 11** - PI should ensure an English language course is included in the curriculum and a standard is set for the admission criteria, within 3 months of publication of this report.
- **Judgement (Follow-Up)** - Although an English course could not be observed in every single curriculum, the desired level of English was set as an entry criterion.

The Appeals Board notes that PI has addressed the recommendation by setting a certain level of English as an entry criterion. In addition, PI has signed an agreement with the NSTS English Language Centre to provide English language courses to students as an immediate solution to meet their educational needs. These courses are offered through specialists in the field and are internationally recognised. While the Appeals Board acknowledges the progress made towards the provision of linguistic education, it considers that PI has not provided evidence that it has included English language courses in every single curriculum and, consequently, has not been able to demonstrate that it has fully met the recommendation.

Therefore, the Appeals Board dismisses the institution's argument and basis for appeal.

- **Key Recommendation 14** - PI should do more to facilitate continuous professional development (CPD) for its lecturing staff in a more structured and coherent manner that includes identification of training needs, budget allocation, monitoring of training impact, and the provision of development opportunities relating to course content, and to upskill their pedagogical competences, within 6 months of publication of this report.
- **Judgement (Follow-Up)** - The panel observed the basics in facilitating continuous professional development, but it is clear that the institution could do more in order to show high-quality employership. At the moment, PI is relying quite heavily on the possibilities of the Erasmus Plus programme; the panel is of the opinion that PI should take a more proactive role itself. A strong case in which PI shows this proactivity is the annual PI Conference, giving staff opportunities for professional development.



The Appeals Board notes that PI is committed to ensuring the professional development of its teaching staff through workshops, seminars and international conferences. As noted in the Follow-Up Report, PI organises international conferences, based on a regular calendar, which enables the teaching staff to share recent developments and thus update themselves on educational methodologies and assessment tools. However, PI has not been able to demonstrate with evidence that it facilitates CPD for its lecturing staff in a more structured and coherent manner, as recommended. The PI's statement that teaching staff is entitled to benefit from the parent institution for training needs reconfirms the judgment of the Follow-Up Report that the PI needs to do more to show high-quality employership by undertaking a proactive role itself and not relying heavily on external opportunities such as the Erasmus Plus programme.

Therefore, the Appeals Board dismisses the institution's argument and basis for appeal.

- **Key Recommendation 17** - PI should consider possibilities to improve facilitation of formally structured meetings between tutors to enable them to discuss any issues or new ideas and share best practice, within 6 months of publication of this report.
- **Judgement (Follow-Up)** - The panel observed a strengthened tutorship, but holds the position that more internal communication would further strengthen it, for instance, through the possibility for tutor intervision sessions meant for sharing experiences and fostering a sense of community amongst tutors.

The Appeals Board notes that PI has made considerable progress in ensuring constant interaction between students and teachers by nominating teachers to coordinate the study courses, drafting guidelines, briefing teachers about the realisation of interactive teaching, monitoring the evidence of interactive teaching, involving administration management to register student feedback, etc. The Follow-Up Report recognises that, from a policy and organisational perspective, interaction between students and teachers is planned and takes place in a defined and structured manner. However, additional steps are recommended to strengthen the tutorship. While the Appeals Board notes that annual conferences serve as a platform for sharing practices among staff, PI has not provided evidence that it initiates additional forms of internal communication, such as specific tutor sessions, specific to the recommendation.

Therefore, the Appeals Board dismisses the institution's argument and basis for appeal.

## Summary of Outcomes

When taking all the above points into consideration, this Appeals Board has concluded the following:

Key Recommendation 1 – Standard 1: Pegaso International has only partially fulfilled its obligations vis-à-vis Key Recommendation 1. While significant progress has been made, there is still room for improvement. A more structured stakeholder engagement process, which includes formal documentation of meetings and deeper involvement of all relevant parties in the strategic document development process, is needed. Hence the Appeals Board dismisses the institution's argument and basis for appeal.

Key Recommendation 3 – Standard 1: While Pegaso International took steps to address the recommendation by appointing experienced personnel and engaging external expertise, they fell short of fully meeting the requirement to assess the effectiveness of the QA Officer. For this reason, the Appeals Board dismisses the institution's argument and basis for appeal.

Mandatory Recommendation 3 – Standard 3: While some progress has been registered in this regard the institution still fell short of satisfying the requirements of the recommendation. The institution was not able to demonstrate that it had fully satisfied its interaction with the various stakeholders, particularly concerning the group of PhD students. For this reason, the Appeals Board dismisses the institution's position and basis for appeal.

Mandatory Recommendation 4 – Standard 3: While Pegaso International demonstrated that it had taken relevant measures at the Bachelor level the Follow-Up panel was unable to confirm the implementation of the agreements in question. Moreover, PI did not present additional information or documentation to substantiate its claims, leaving the panel without the necessary evidence to verify the actions taken. For these reasons, the Appeals Board dismisses the institution's argument and basis for appeal.

Key Recommendation 5 – Standard 3: While Pegaso International has taken various steps to address this recommendation, such as adopting a series of relevant policies and integrating supervision into its CPD courses, there is no evidence which attests that these measures are being implemented across all levels. For this reason, the Appeals Board dismisses the institution's argument and basis for appeal.

Key Recommendation 8 – Standard 4: While there is still room for development the Appeals Board notes that what is currently there is enough to ensure the successful accomplishment of the recommendation submitted in the Follow-Up Report. Hence, the Appeals Board upholds the institution's argument and basis for appeal, and recommends the MFHEA upgrade the judgement to 'Meets Requirements'.

Key Recommendation 11 – Standard 5: Pegaso International has not provided evidence that it has included English language courses in every single curriculum and, consequently, has not been able to demonstrate that it has fully met the recommendation. For this reason the Appeals Board dismisses the institution’s argument and basis for appeal.

Key Recommendation 14 – Standard 6: Pegaso International has not been able to demonstrate with evidence that it facilitates continuous professional development (CPD) for its lecturing staff in a more structured and coherent manner, as recommended. Therefore, the Appeals Board dismisses the institution’s argument and basis for appeal.

Key Recommendation 17 – Standard 6: While Pegaso International has made considerable progress in ensuring a positive and regular interaction between students and teachers PI has not provided evidence that it initiates additional forms of internal communication, such as specific tutor sessions specific to the recommendation. Therefore, the Appeals Board dismisses the institution’s argument and basis for appeal.

### **Decision**

The Appeals Board upholds the appellant’s arguments in Standard 4 while dismissing the appellant’s position in Standards 1, 3, 5 and 6. The Appeals Board found that the Audit and Follow-Up process were deemed to have been fair and according to law, hence, there is no need for another evaluation.

The Appeals Board recommends **No** refund be issued in favour of the appellant. This decision was taken after considering the conclusions of the Appeals Board and the submissions of the appellant.

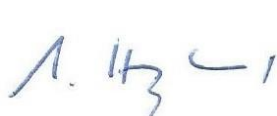
### **Signatories**

The report of the Appeals Board is endorsed by:



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Dr Robert Cassar PhD (Chair)



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Dr Achim Hopbach PhD



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Ms Furtuna Mehmeti

Date: 27<sup>th</sup> May 2024