

**Report of the Appeals Board Panel on a re-validation of the application from
MED.E.A. for a licence to operate as a university in Malta**

Rationale

The Malta Further and Higher Education Authority (MFHEA) received an application from Pegaso International Limited to operate as a university in September 2021. Pegaso International was already licensed to operate as a Higher Education Institution (HEI) (Licence No: 2016-001). This institution is now legally known as MED.E.A. - Digital Institution for the Mediterranean, Europe and Africa. The original application was submitted under the name Pegaso International.

The MFHEA appointed a panel of experts for re-validation of the findings of the previous licence application panel, in order to address this request in terms of the legal framework regulating Further and Higher Education institutions in Malta. The former panel recommended that University status should not be granted.

The panel started its workings in March 2025 and concluded in October 2025. It convened one time with the MFHEA online and six times online as a panel, and with the institution during two site visits. At the heart of the validation lie the reflections of the previous panel considering;

Article 47/1: Are HE, teaching, research and dissemination of knowledge the primary activities of the applicant?

Article 47/2: Does the applicant have academic staff, an academic library, and stable research training or stable research and development activities of a high standard?

Article 47/3: Does the applicant have representative bodies of staff and students? Do these bodies meet regulatory requirements?

Article 47/4: Are the applicant's organisation and infrastructure appropriate for providing higher education and undertaking research?

Article 47/5: What independent competence in setting up HE programmes does the applicant already have? What programmes does the applicant already provide? Who accredits them? Does the applicant already have an independent right to award degrees for such programmes?

Article 47/6: To which international HE and/or research networks is the applicant already affiliated?

Article 47/7: How does the applicant participate in national and international teaching and/or research?

In the next chapter the panel will present its findings. It is important to understand that the panel did not include the period after study year 2023-2024 in its considerations. The validation effort was geared towards the findings of the previous panel, and that did not include the current situation of MED.E.A. However, the panel thought it notable that the institution is making further steps in professionalisation and quality assurance, and growing in the bigger context of the multiversity group. Another side note, which has more relevance to the findings of this panel, is that MED.E.A. is firmly grounded in multiversity, a bigger consortium in which Pegaso is an ANVUR accredited university. This is relevant because MED.E.A. and its online students benefit from mature resources like a professional, up to par scientific library, good administrative and technical support for online education, and a certain grounding in broader research activities.

However, at the heart of the panel's findings lies evidence it gathered on the different subjects related to articles 47/1 to 47/6. These findings are, for every point the previous panel described, presented in the next chapter. The panel's conclusion as a result of this analysis is given at the end of this report.

Findings per article

Article 47/1: Are HE, teaching, research and dissemination of knowledge the primary activities of the applicant?

Previous panel;

Higher Education is indeed the primary activity of the applicant. It is already operating as an HEI under licence in Malta and is fully engaged in teaching. Nevertheless, although the nature of distance learning obviously constrains interaction between teachers and learners, some of the students who contributed to the recent EQA follow-up site visit had found interaction noticeably limited, particularly in the PhD programmes.

In addition, evidence regarding the research activity of academic staff employed by Pegaso International and its influence on teaching is scanty. The panel reviewing the application therefore has concerns about dissemination of knowledge, because the research element is not strong.

This panel's findings;

1.2 Current Panel Findings: The present panel's review of recent documentation, specifically the PhD Process Policy (29/05/2020) and minutes of the PhD Steering Committee dated 27/02/2020, 04/04/2020, 09/06/2020, 23/04/2021, 21/09/2021, indicates significant strides in addressing earlier concerns. The strategic synergy between Naples and Malta campuses represents a structured and deliberate integration aimed at leveraging traditional academic strengths from Naples and innovative, digitally supported teaching and research practices in Malta. This partnership, described as "strategic bifocality," effectively combines robust academic governance with dynamic international outreach.

The recent evidence illustrates a collaborative framework between Naples and Malta campuses, particularly evident in the management and support of PhD programmes. Malta's involvement in significant applied research projects, notably the EU-funded Sylvanus Project, underscores its active role in research dissemination, integrating findings directly into doctoral curriculum development. This initiative aligns closely with the institution's aim to enhance transnational applied research and innovation in curriculum design, clearly responding to prior panel criticisms concerning research engagement and dissemination.

1.3 Current Panel Findings: Current data showcasing active academic staff engagement, including contributions to projects, publications and conference proceedings, demonstrates improved transparency and stronger evidence of research activity compared to the initial review.

Conclusion: The updated evidence presented addresses previous panel concerns by highlighting enhanced interactivity in doctoral programmes through integrated administrative and academic functions across campuses. The documented contributions to applied research projects and improved visibility of academic staff engagement reinforce the applicant's commitment to robust research practices and dissemination of knowledge.

Article 47/2; Does the applicant have academic staff, an academic library, and stable research training or stable research and development activities of a high standard?

Previous panel;

- 2.1 This requirement does not appear to be fully met because of the limited research activity already mentioned above.
- 2.2 According to the application documentation the applicant appears to have sufficient staff. The recent EQA follow-up site visit report indicates improvement in access to academic resources including an online library. Development activities include an in-house conference and encouragement to staff to participate in research. However, much of this activity is recent and the panel is unable to evaluate the extent to which it may lead to the high standards necessary for a fully positive answer to this question. More evidence of positive outcomes is needed.

This panel's findings;

2.1 Current Panel Findings: The current panel received a clear demonstration of the online library's functionality during the appeals visit. According to the presentation at the MED.E.A. office, the digital library was launched on 27/03/2023. While the previous panel visited in November 2023, it appears they may not have requested a practical demonstration of the library, despite it already being operational at the time. In contrast, this panel was given practical demonstrations both at the Pegaso Headquarters in Naples and at the MED.E.A. offices in Malta, confirming that the digital library is functional and accessible, marking a positive development in academic resource provision.

2.2 Current Panel Findings: Evidence available at the MED.E.A. office confirms a consistent pattern of academic conferences, both in Malta and Italy, indicating active academic engagement and research development. These include:

- PI Conference 2019, Malta (18–19 October)
- PI Conference 2020, Online (23–24 October)
- PI Conference 2021, Online (29–30 October)
- PI Conference 2022, Online (21–22 October)
- MakeLearn, TIIM, PI Conference Malta and Online (18–20 May 2023)
- Campus Principe di Napoli Conferences: 27–28 July 2023, 12–13 October 2023, and 15–16 November 2023

In addition, the panel reviewed a PowerPoint slide listing 33 MED.E.A. academic staff involved in various projects, publications and conference proceedings. This suggests an increasingly stable research culture and greater institutional support for staff development. While some initiatives remain relatively recent, the volume and consistency of activities now demonstrate a maturing research environment.

Conclusion: Compared to the previous panel's findings, the current evidence illustrates measurable progress in the availability of academic resources and the institutionalisation of research-related activities. Demonstrated access to a fully operational online library and a regular calendar of academic events, alongside growing staff participation in scholarly work, collectively represent a substantial response to earlier critiques.

Article 47/3: Does the applicant have representative bodies of staff and students? Do these bodies meet regulatory requirements?

Previous panel;

3.1 This requirement does not appear to be fully met.

3.2 The recent EQA follow-up site visit confirmed that Pegaso International does have representative bodies of staff and students, but its report also stated they are not all used well. It is therefore unclear whether the activities of these bodies meet regulatory requirements for a licence to operate as a university.

This panel's findings;

3.2 Current Panel Findings: The appeals panel reviewed evidence in the form of agendas and minutes from both staff and student representative meetings. A Staff Representation Meeting Agenda dated 13/05/2021 included participant names, affiliations and discussion topics. Similarly, Student Representation Meeting Agendas were provided for meetings held on 13/05/2021, 03/05/2022 and 18/03/2023, all of which documented attendees, their representative roles, and agenda items.

Additionally, the panel conducted an interview with a PhD alum who had served as a student representative between 2020 and 2023. The discussion provided insight into the role and influence of student representation during that period, offering evidence of both participation and engagement.

Conclusion: Compared to the earlier findings, the documentation and testimony reviewed by this appeals panel present a clearer picture of structured and active representative bodies within the institution. The presence of formal records and participant engagement supports the case that the institution is now meeting the regulatory expectations for staff and student representation.

Article 47/4: Are the applicant's organisation and infrastructure appropriate for providing higher education and undertaking research?

Previous panel;

- 4.1 The panel is unable to make a judgement on this issue. The evidence it has is broadly positive but insufficient for certainty.
- 4.2 The recent EQA follow-up report is positive about Pegaso International's adoption of a continuous improvement approach, at least in principle. As one example, progress has been made in specifying requirements for English language fluency and supplying support to students for whom learning and writing in English for academic purposes present challenges.
- 4.3 The gap in information is therefore not about strategies but their impact on its provision. For instance, how effectively are teaching staff responding to the guidelines and opportunities for professional development which they are now receiving? How many of them are now undertaking research, attending conferences, and engaging with the wider research community? And how, and to what extent, is this influencing and improving teaching and outcomes for students?
- 4.4 The applications panel had concerns that there may not yet be full understanding within Pegaso International of how Quality Assurance policies and procedures must lead to visible outcomes. The findings of the Appeals Board, which rejected all but one of Pegaso International's challenges to its most recent EQA audit, suggest this might be the case.

This panel's findings;

4.3 Current Panel Findings: The panel finds that MED.E.A. has moved from a fragmented to a more structured, systematic approach to Continuing Professional Development (CPD). Evidence from the Residential Seminars for Professional Development of Teachers held at the Principe di Napoli Campus in July, October and November 2023 shows targeted training on interactive teaching strategies and PhD supervision. Complementary records of tutorials in Civil Engineering and Business Administration (2022–2023) and Adult Education (2023–2024) confirm that CPD outcomes were applied in daily teaching practice, with tutors reporting improved responsiveness to student needs and more effective use of the learning platform.

The Mandatory Workshop on Research Methodology (2019–2023) has been integrated into annual doctoral training, equipping PhD students with methodological skills. Reports indicate measurable improvements in research outputs, with approximately one-fifth of theses in 2023–2024 receiving “very good” to “excellent” ratings. The inclusion of faculty research outputs—such as the book chapter *The Best of Both Worlds: Use of Information-Communication Technologies among Teenage Migrants in Slovenia*—illustrates how CPD activities help align research with teaching.

Academic resources and staff expertise underpin these developments. The digital academic library became fully functional in March 2023, providing a direct resource for both teaching and research. In addition, staff expertise in online learning and LMS supports the institution’s digital pedagogy, while a sequence of research reports from 2014–2023 evidences continuity of research culture feeding into academic development and CPD.

Strategic activities further embed CPD across the institution. The event on Prior Learning Recognition: A Mediterranean Perspective (March 2023) convened senior European higher education leaders and functioned as a CPD platform by integrating regulatory, academic and social perspectives into programme development. This aligns with the Pegaso International Strategic Plan 2023–2026, which positions CPD as a driver for academic expansion and innovation. A concrete outcome reported is the expansion of the educational offer, including new programmes designed in areas such as Global Studies and Migration Studies, where CPD directly influenced curriculum innovation.

The panel also notes that some materials pertain to 2024 (e.g., Innovative Tools, AI Tutor ChatBot and Exam Generator, and an international conference). While these provide useful insight into forward-looking CPD, they fall outside the timeframe under review (up to November 2023) and are therefore not considered in this assessment.

Conclusion: Overall, the panel recognises clear progress, with tangible outcomes beginning to emerge: measurable improvements in doctoral supervision and thesis outcomes; practical application of CPD in tutorials; integration of research into teaching; operationalisation of the academic library; strengthened staff expertise in digital learning; and the embedding of CPD into strategic planning. These developments collectively indicate a more mature and outcome-oriented CPD model at MED.E.A.

4.4 Current Panel Findings: The panel finds that MED.E.A. has strengthened its organisational capacity by expanding and updating core policies in academic integrity, equality, course design and internal quality assurance, and by using CPD as a strategic driver for institutional growth. Leadership participation in an EU-funded applied research project launched in 2020 demonstrates the institution’s ability to operate within complex, externally reviewed frameworks while creating structured CPD opportunities that build advanced management, dissemination and QA-aligned practices. Strategic collaboration in 2023 with a multidisciplinary research consortium has provided staff and students access to advanced research infrastructure and professional exposure, showing how QA policies are being operationalised to support research-led teaching.

Regional outreach between August and October 2023, particularly through a targeted Action Plan for Africa, illustrates long-term planning capacity and the practical alignment of CPD, research and international engagement to expand high-quality higher education opportunities, including distance learning adapted to contextual needs. In parallel, a sustained programme of academic conferences from 2019 to 2023 has served as a recurring platform for knowledge exchange, staff development and research dissemination, strengthening both internal capability and external visibility.

The panel notes that certain initiatives from 2024 indicate promising future directions but fall outside the timeframe under review (up to November 2023) and are, therefore, not considered in this assessment.

Conclusion: Overall, the trajectory is positive: MED.E.A. is integrating CPD, QA policies and strategic development into a coherent organisational model. While the full translation of these policies into consistently measurable outcomes across all programmes is still in progress, the institution shows growing structural maturity and a consolidating foundation for high-quality higher education and research.

Article 47/5: What independent competence in setting up HE programmes does the applicant already have? What programmes does the applicant already provide? Who accredits them? Does the applicant already have an independent right to award degrees for such programmes?

Previous panel;

- 5.1 This requirement is not fully met.
- 5.2 The recent EQA follow-up report indicates lot of work in progress, some of which infills gaps in the original paperwork supplied to this panel. However, there is insufficient about outcomes. As an example, the recent site visit report indicates frequent mention in documents of monitoring but without any precision about how monitoring is defined or carried out.
- 5.3 A particular matter of concern to the application panel originally was the absence of a Quality Assurance officer and clarity about their role. This post now exists, and has been filled, but the appointment is recent and the individual appointed has not had time to make an impact. This is a key role in sustaining the quality assurance required for independent award of qualifications by a university. The licence application panel found many references in the latest progress report from Pegaso International to work which the Quality Assurance officer plans to undertake. One example indicates intention to evaluate their own engagement with accrediting bodies, industry partners and alumni, analysing and incorporate their feedback to enhance the institution's quality, but there was no evidence that this work is currently in progress or, crucially, of any impact so far.

This panel's findings;

5.3 Current Panel Findings: The panel finds that MED.E.A. has established a functioning quality assurance (QA) system led by a dedicated manager and underpinned by a progressively updated suite of manuals, policies and guidelines.

From 2020–2021, foundational policies and governance instruments were introduced, covering academic integrity, lecturer guidance, lesson planning, staff support, registration and admissions, governance, and equality, equity, diversity and inclusion, providing clear structures for academic delivery and mechanisms for staff to raise and address quality matters.

In 2022, the QA framework was subjected to external scrutiny through an institutional audit, complemented by internal self-assessment and a formal institutional response. This period also saw updated governance and lecturer guidance, alongside comprehensive academic, administrative, IT and student-facing QA procedures, and the systematic use of student feedback tools. Together, these elements indicate the emergence of an evidence-informed QA cycle.

By 2023, QA activity had become more consistently institutionalised. Key developments included refreshed academic integrity procedures; alignment of QA with strategic planning; updated governance documentation; strengthened ethics, data protection and compliance processes; a dedicated QA assessment exercise; and codified processes for course design, programme development and approval. Student support and mature student policies were consolidated, academic supervision at doctoral level was formalised, and lecturer guidance was updated in line with European Standards and Guidelines.

Out-of-scope materials produced in 2024–2025 are noted as forward-looking but are not considered in this assessment, which covers activity up to November 2023.

Conclusion: Overall, the panel judges that MED.E.A. has moved beyond policy drafting toward an operational QA system. The combination of policy frameworks, governance manuals, self-assessment, external audit evidence, and academic audit processes demonstrates that QA activities are embedded in practice. While consistent, measurable outcomes across all programmes remain a work in progress, evidence from 2022–2023 indicates a maturing QA function with mechanisms in place to monitor quality, support academic staff, and drive continuous improvement. This represents a meaningful step forward compared with the concerns identified by the previous panel.

Article 47/6: To which international HE and/or research networks is the applicant already affiliated?

Previous panel;

6.1 The panel is unable to make a judgement on this issue. The evidence it has is broadly positive but insufficient for certainty.

6.2 There is evidence of some affiliation to appropriate networks. Pegaso International is a member of the Multiversity network of universities aiming to provide “international students worldwide with a flexible, inclusive and accessible education” (<https://pegasointernational.eu/about-us/mission-and-vision>, 27-01-24). Such a network has clear potential benefits for Pegaso International. Moreover the recent EQA follow-up visit report supplies evidence that the applicant is seeking wider affiliation to appropriate international HE networks, and is using Erasmus Plus for staff development, though Pegaso International could provide more of the latter in-house. There are some indications of research conference involvement. Requirements may be met but evidence of impact of all current activity in this area is missing.

6.3 Comments under 2.2 and 4.3 above also apply here.

This panel's findings;

6.1 Current Panel Findings: The current panel reviewed substantial new evidence illustrating more established and diverse international affiliations. Notably, the Service Agreement between Università Telematica Pegaso and Pegaso International, dated 20 April 2006 (Annex 49), shows long-standing administrative and academic collaboration, now operating under the name MED.E.A. The agreement outlines shared services in areas including Marketing, Communications, HR, IT, Legal and Finance.

MED.E.A. has also joined the EMUNI Consortium (membership paid for 2025), and entered into a formal research agreement with the Benecon University Consortium on 21 June 2023. Additionally, a list of 28 network agreements with global institutions and 17 partnerships with companies and universities from Italy, India, the UK, Malta and the UAE indicates broadening international connections.

6.2 Current Panel Findings: Organisational and Project-Based Networks: The service agreement with Università Telematica Pegaso (Annex 49) demonstrates that MED.E.A. benefits from a comprehensive network infrastructure supporting academic and administrative functions. These include professional development, regulatory compliance and institutional governance—all foundational to active and sustained participation in international higher education networks.

6.2 B : Benecon University Consortium: MED.E.A. is a member of the Benecon University Consortium, a scientific research network that includes 6,000 researchers and extensive international cooperation projects. Benecon has hosted major international forums, including:

- World Heritage and Design for Health (2021)
- World Heritage and Ecological Transition (2022)
- World Heritage and Dwelling on Earth (2023)

Evidence from the Naples visit further confirmed MED.E.A.'s involvement in the Benecon Research Centre's Albania Project. These initiatives reflect a high level of scholarly engagement and international visibility.

6.2 C : Erasmus+ and Internal Staff Development: MED.E.A. participates in the Erasmus+ Programme under Key Action 171:

- 2022–2025: KA171-HED-000080695 with Philadelphia University, Jordan; this project facilitates the exchange of academic staff, fostering intercultural dialogue, institutional development, and the internationalisation of higher education.
- 2023–2026: KA171-HED-000130646 with Batumi State Maritime Academy, Georgia; this initiative supports academic mobility and cooperation in the field of maritime education, contributing to capacity building and the mutual exchange of expertise.

In addition to external Erasmus collaborations, Annex 52 includes a comprehensive three-year institutional training plan (2023–2025) targeting technical and administrative staff. Training modules include digital skills, language development, professional expertise and soft skills. The plan shows a serious institutional investment in international alignment and capacity-building, extending beyond academic staff to the broader operational workforce.

6.2 D : Strategic Research Projects: Silvanus and Mattei Plan: MED.E.A.'s active involvement in high-profile, international projects further confirms its growing international stature. The Silvanus Project, launched in 2020 and funded by the EU Green Deal programme, includes over fifty partners from 23 countries. Its multidisciplinary focus on wildfire prevention integrates policy, legal frameworks and technological innovation. Malta's significant contribution includes shaping dissemination efforts and curriculum development, particularly for the PhD in Sustainable Development launched in 2021.

The Mattei Plan – Africa Project, which was launched in 2023, further underscores MED.E.A.'s engagement with transnational research in sustainable development across Africa. By addressing issues in health, energy, agriculture and education, the Mattei Plan reflects MED.E.A.'s role in promoting intercultural dialogue and global social responsibility.

Both projects exemplify the institution's capacity to translate academic research into practical policy impact and curriculum design. They also signal a maturing research culture with meaningful international collaborations, reflecting MED.E.A.'s intent to position Malta as a key node in global academic networks.

Conclusion: Compared to the previous panel's tentative observations, this Appeals panel finds significant and verifiable progress in the applicant's international network affiliations. MED.E.A. now demonstrates both structural connectivity through long-term partnerships and strategic depth via applied research collaborations and capacity-building initiatives.

Article 47/7: How does the applicant participate in national and international teaching and/or research?

Previous panel;

- 7.1 The panel is unable to make a judgement on this issue. The available evidence is insufficient for the panel to be convinced that positive change has occurred.
- 7.2 The original application documents do not supply sufficient evidence. The recent EQA follow-up site visit found that Pegaso International is seeking to expand activity in this area (see 6.2 above) but the extent of systematic and active staff and student participation is unclear.

This panel's findings;

7.1 and 7.2 Current Panel Findings: The panel finds that MED.E.A. has presented substantial participant-level evidence of international engagement across staff and students.

Staff engagement and conference leadership from 2019–2023 show sustained participation as organisers, speakers and session chairs at large, multi-country events—demonstrating the institution's capacity to convene international audiences and to provide recurring platforms for academic visibility, networking and knowledge exchange.

At the project level, faculty played active roles in EU-funded initiatives during the review period, acting as coordinators, trainers and content developers. These activities reinforced institutional expertise in areas such as digital education and social entrepreneurship, expanded international research networks, and translated project outcomes into teaching and mentoring opportunities.

Student participation records for 2011–2023 indicate that PhD candidates and early-stage researchers presented papers at international conferences (e.g., PiConf, MakeLearn, TIIM), published in proceedings, and engaged in cross-country scholarly discussion. Involvement in Erasmus+-type projects created additional opportunities for applied research, mentoring and participation in international competitions, with tangible outcomes such as recognised digital badges and certificates.

The panel notes that some materials from 2024 indicate promising future directions but fall outside the timeframe under review (up to November 2023) and are not considered in this assessment.

Conclusion: Overall, international engagement is embedded in MED.E.A.'s operations. Staff contributions through conference leadership and EU projects strengthen institutional visibility and academic capacity, while students benefit from presenting, publishing and project-based collaboration. This constitutes a clear, participant-level response to earlier requests for evidence and indicates that internationalisation is becoming a structural feature of MED.E.A.'s academic model.

Conclusion of the Report

The Appeals panel, having carefully reviewed the evidence presented, finds that the concerns identified by the original panel have some inconsistencies and have omitted important evidence during the evaluation process. MED.E.A. has demonstrated clear progress in aligning with the statutory requirements under Article 47 of the Further and Higher Education Institutions Act.

- Article 47/1–2: Higher education, teaching, research and dissemination of knowledge are confirmed as the institution's primary activities. The panel verified the existence of a functional academic library, growing research outputs, and structured engagement in EU-funded projects. Academic staff are increasingly active in conferences, publications and doctoral supervision, reflecting a maturing research culture.
- Article 47/3–5: Representative bodies of staff and students are in place and functioning, supported by documented agendas and minutes. Organisational structures have matured through the establishment of a comprehensive quality assurance framework, continuing professional development for academic staff, and integration of quality procedures into strategic planning. Evidence shows that MED.E.A. is capable of independently designing, delivering and monitoring higher education programmes in line with European standards.
- Article 47/6–7: MED.E.A. is firmly embedded in international higher education and research networks through its role in the Multiversity consortium, formalised partnerships such as the Benecon University Consortium, and Erasmus+ collaborations. Staff and students are actively participating in international projects and conferences, enhancing institutional visibility and ensuring that internationalisation is a structural feature of the academic model.

Taken together, the panel concludes that MED.E.A. demonstrates the organisational capacity, academic resources, governance structures, research engagement, and international integration required of a university. The institution has established a credible, sustainable foundation for delivering high-quality higher education and research in Malta.

In light of this, the Appeals Board panel is of the view that the original decision not to grant MED.E.A. a university licence was unjustifiable. The evidence available at the time, together with the subsequent confirmation of institutional maturity, indicates that MED.E.A. met the requirements for University status and should have been granted a licence to operate as a university in Malta.

The Appeals panel found clear and verifiable evidence in MED.E.A.'s academic infrastructure, quality assurance, research engagement and international connectivity. The institution has operationalised key enablers most notably an evidence-driven QA cycle, a functioning digital library, structured CPD linked to doctoral training, and participation in EU-funded and consortium-based research addressing material concerns raised earlier. While the translation of policies into uniformly measurable outcomes across all programmes remains ongoing, the current evidence indicates a maturing, outcome-oriented academic environment with strengthening governance and support systems.

Since the panel's findings are in favour of the appellant, the provider should be refunded 25% of the paid fee.

Hendrik Martijnse



Shkelzen Gerxhaliu



Bernard Micallef



9th October 2025