Preamble:

The Malta Foundation for Human Resources Development (FHRD) wishes to express its gratitude to the Malta Further and Higher Education Authority (MFHEA) and the independent Peer Review Panel for the professional and thorough External Quality Assurance Audit conducted in February 2026. This exercise has provided FHRD with a valuable opportunity for mature reflection on our mission to advance the HR profession in Malta.

We are highly encouraged by the Panel's findings, which confirm that FHRD is either fully or substantially compliant with all applicable National Standards. In particular, we take pride in the achievement of full compliance in key areas such as Quality Management and Programme Design, and we note with satisfaction that no mandatory recommendations were issued. This outcome is a testament to the dedication of our small yet highly professional team.

FHRD fully embraces the five Key Recommendations and nine general Recommendations provided. As an organisation that values a lean and flexible operational structure, we recognise that the next stage of our development involves formalising our internal cultures - ranging from strategic planning cycles to systematic staff feedback mechanisms. The following feedback document outlines our proactive response and specific timelines for implementation, reflecting FHRD's unwavering commitment to providing quality education for confident futures.

Response to Mandatory Recommendations Made by the Peer Review Panel

Action plan		
Mandatory Recommendations	Actions to be taken to address the recommendations	Date for completion
Standard 1:		
Standard 2:		
Standard 3:		
Standard 4:		
Standard 5:		
Standard 6:		
Standard 7:		
Standard 8:		
Standard 9:		
Standard 10:		
Standard 11:		

Response to Key Recommendations and Recommendations Made by the Peer Review Panel

Action plan		
Recommendations	**Actions to be taken to address the recommendations**	**Date for completion**
Standard 1:		
KR1: The FHRD should strengthen strategic planning processes by setting an explicit agenda for a longer period of time than it is covered in the Business Plan now, within nine months of the publication of this report.	FHRD welcomes the Panel's recommendation to further strengthen its strategic planning processes. The HR and training landscape is continuously evolving, with changing workforce realities, emerging skills requirements, and shifting organisational needs. As a result, FHRD considers it important to retain a degree of agility and flexibility in adapting its offerings, including accredited training programmes, seminars, webinars, non-accredited learning sessions, and other professional development initiatives. While FHRD does not currently consider a fixed long-term five-year plan to be the most effective approach in such a dynamic environment, the CEO will work on the development of a rolling three-year strategic plan. This will be discussed with the President and subsequently submitted to the Board of Administrators for consideration and approval within the timeframe indicated by the Panel.	**March 2027**
Standard 2:		
KR2: The FHRD should develop a formal mechanism ensuring that the staff satisfaction (incl. trainers' satisfaction) is surveyed and worked with, within nine months	FHRD welcomes the Panel's recommendation to further strengthen its strategic planning processes and recognises the importance of formally gathering and reviewing staff and trainers' feedback as part of its continuous improvement efforts. Following the recommendation under KR2, the matter was discussed internally and subsequently with the Programmes Sub-Committee. The CEO, together with the Projects/Training Executive, developed a Staff and Trainers' Satisfaction Survey,	**Survey finalised in June 2026.** **First roll-out in November 2026.**

of the publication of this report.	which was presented to the Programmes Sub-Committee during its meeting held on 2 June 2026. Following the discussion, minor amendments were proposed and incorporated, and the survey has now been finalised. Given the small size of the organisation and in order to ensure fairness and confidentiality, the survey will be distributed simultaneously to all FHRD staff members and trainers once annually during the last quarter of each year. The feedback collected will be reviewed by the CEO and subsequently discussed with the President to identify areas for improvement and support the organisation's ongoing quality enhancement processes. *Refer to Annex 1 for the Employee and Trainers Annual Survey Template.*	
R1: Consider formulating a formal policy mandating gender balance.	FHRD thanks the Panel for its recommendation concerning gender balance within the Board of Administrators and acknowledges the value that diversity brings to effective governance and decision-making. FHRD's current governance framework provides for an open nomination process through which Sponsors (FHRD Members) may submit nominations based on professional HR expertise, competence, and integrity, in line with the Statute and internal regulations. Board appointments are therefore member-led and merit-based in nature. Eligible candidates submitting nomination to join the Board of Administrators must: • Be Members of FHRD for at least three (3) consecutive years. • By members, it is understood Corporate Members, Associate Members, and/or Fellow Members. • Eligible candidates are to be paid FHRD Members (Sponsors) for at least three (3) years. • Elections are open to all candidates who can contribute to furthering and/or implementing the Foundation's aims.	

	• Candidates must be HR professionals with at least five (5) years of experience, including a minimum of three (3) years in a managerial position. • Candidates should be free from any potential conflict of interest. • If a Board Member is no longer employed with the entity that is a member of FHRD, the Board Member in question will still be considered as a Member of the Board until the end of the term in question. Re-election for the new Board will be possible if the Board Member in question becomes a paid-up member of FHRD within 3 months of the resignation. By member, it is understood as Corporate Members, Associate Members, and/or Fellow Members. • Board Members need to be employed with different entities. In the case that a Board Member resigns from their employment, and joins an entity that is already represented on the Board, they can remain in office until the end of the term in question. However, only one of them can seek re-election for the new Board. While FHRD does not presently envisage the introduction of a formal mandatory gender balance policy, it remains committed to fostering inclusive participation and encouraging diverse representation across its structures and activities. In practice, prior to elections, the CEO and Board Secretary proactively reach out to potential candidates to encourage the submission of nominations, while also keeping the importance of gender balance and diversity in mind throughout the process. Furthermore, FHRD notes that any amendment to the Statute is a lengthy, resource-intensive, and costly process. The Statute was last revised in 2022, and at present the Board no plans to undertake further amendments in this regard.	

Standard 3:		
R2: **Notwithstanding the small size of the Foundation, the FHRD could explore ways of further integrating quality management considerations into its strategic planning processes**.	FHRD acknowledges the Panel's recommendation regarding the further integration of quality management considerations within its strategic planning processes. Given the size and operational structure of FHRD as a small non-governmental and non-profit organisation, quality management considerations are already integrated within the Foundation's ongoing operational planning, programme review, and decision-making processes rather than through a separate stand-alone quality management structure. FHRD continuously reviews participant feedback, trainer feedback, programme performance, and industry developments when evaluating existing activities and planning future initiatives. These matters are regularly discussed between management and the Board in order to ensure that programmes and activities remain relevant, effective, and aligned with the evolving needs of the HR sector. Following the Panel's recommendation, FHRD has also updated its Quality Manual to further formalise the link between quality assurance and strategic planning processes. The revised procedures now require that annual planning and programme review discussions formally take into consideration stakeholder feedback, programme performance outcomes, identified improvement actions, and emerging sector needs as part of the Foundation's strategic and operational planning process. FHRD believes that this approach remains proportionate to the size and nature of the organisation while further strengthening its internal quality culture and continuous improvement practices. *Refer to Annex 2 for the Quality Manual – update of Clause: Ongoing Quality Assurance*	

R3: The FHRD could consider introducing a more formalised mechanism through which the development and effectiveness of its internal quality culture can be monitored and evaluated.	FHRD acknowledges the Panel's recommendation regarding the introduction of a more formalised mechanism through which the development and effectiveness of the institution's internal quality culture can be monitored and evaluated. In response to this recommendation, FHRD has updated its Quality Manual to include a dedicated section entitled "Internal Quality Culture", formalising the institution's approach towards monitoring and evaluating quality awareness and engagement across the organisation. The following clause has now been added into the Quality Manual: **<u>Internal Quality Culture</u>** FHRD is committed to fostering and continuously improving an internal quality culture across all levels of the organisation. To monitor and evaluate the effectiveness of this culture, FHRD conducts an annual satisfaction survey directed at its employees and trainers. This survey includes questions designed to assess awareness of, and engagement with, quality standards and practices within the organisation. Findings from the survey are reviewed by management and used to identify areas for improvement, ensuring that quality remains embedded in the day-to-day operations and ethos of FHRD. This formalised mechanism further strengthens FHRD's commitment to continuous improvement, accountability, and the ongoing development of a quality-focused organisational culture. The annual Staff Satisfaction Survey and Trainers' Satisfaction Survey will specifically incorporate questions addressing the institution's internal quality culture, awareness of quality processes, and engagement with quality assurance practices. • *Refer to Annex 1 for the Employee and Trainers Annual Survey Template.* • *Refer to Annex 2 for the Quality Manual*	

Standard 4:		
KR3: The FHRD should update its Privacy Policy to ensure that all relevant disclosures required under the General Data Protection Regulation are clearly included. This should be completed within three months of the publication of the report.	FHRD acknowledges the Panel's recommendation regarding the updating of the institution's Privacy Policy to ensure full alignment with all disclosure requirements under the General Data Protection Regulation (GDPR). FHRD takes data protection and privacy obligations seriously and has already initiated discussions with its legal advisors to review the current Privacy Policy and identify any areas requiring enhancement or clarification. FHRD is currently awaiting formal feedback and recommendations from its lawyers to ensure that any revisions made are accurate, comprehensive, and fully compliant with GDPR requirements. Following receipt of this feedback, FHRD will update the Privacy Policy accordingly and publish the revised version within the timeframe established by the Panel's recommendation.	**September 2026**
KR4: The FHRD should consider introducing a mechanism to identify whether prospective students belong to vulnerable groups. This could be incorporated at the application or enrolment stage. A procedure should also be established outlining how such cases would be managed and supported where necessary. This should be	FHRD acknowledges the Panel's recommendation regarding the introduction of a mechanism to identify prospective students who may belong to vulnerable groups, together with appropriate support procedures. Following internal discussions, an updated application form and related internal process were reviewed and agreed upon by the Programmes Sub-Committee during its meeting held on 30 April 2026. The matter had already been discussed internally prior to the receipt of the official report, as this issue was highlighted by the Panel during the audit visit itself. The revised application form was subsequently amended by FHRD's appointed designers and will come into effect as from 22 May 2026. The updated process introduces a mechanism through which prospective students may voluntarily indicate whether they require additional	**Process completed in May 2026.** **First roll-out in June 2026.**

implemented within six months of the publication of the report.	support or consideration during their studies. In parallel, FHRD has established an internal procedure outlining how such cases will be managed, reviewed, and supported in a confidential and appropriate manner. *Please refer to Annex 3 for the updated application form and related documentation.*	
R4: FHRD could define an indicative similarity threshold for plagiarism detection to minimise the risk of subjective assessment.	FHRD acknowledges the Panel's recommendation regarding the establishment of an indicative similarity threshold for plagiarism detection in order to minimise the risk of subjective assessment. In response to this recommendation, FHRD has updated the Student Handbook in May 2026 to provide clearer guidance on the institution's approach to plagiarism and the use of Artificial Intelligence (AI) within student assessments. The revised wording formally introduces an indicative plagiarism threshold while maintaining the institution's ability to exercise academic judgement on a case-by-case basis. The following statement has now been incorporated into the Student Handbook: "FHRD uses Grammarly as its official plagiarism and Artificial Intelligence (AI) detection software. All assignments received will be uploaded onto the portal, and a resultant report will indicate whether plagiarism or AI was found and/or used. While Grammarly provides a % similarity report, FHRD has established a maximum plagiarism threshold of 15%. However, it remains at the discretion of FHRD, in consultation with the trainer, to determine whether a student's work is considered plagiarised, whether there is excessive use of AI, and the extent to which either may be deemed acceptable." This approach provides greater transparency and consistency for students and trainers, while recognising that similarity reports must still be interpreted within the academic and contextual nature of each assignment submission.	

	Please refer to Annex 4 for the Student Handbook Version 10. This version will be sent to Students who register for FHRD courses as of June 2026 onwards.	
Standard 5:		
R5: The FHRD could consider developing a more formalised framework for the professional development of teaching staff. Such an initiative would support continuous pedagogical enhancement and further strengthen the quality of programme delivery.	The Foundation acknowledges the Panel's recommendation regarding the further formalisation of professional development opportunities for teaching staff. FHRD primarily delivers short MQF Level 5 Award programmes through trainers engaged on a service agreement basis rather than as employees of the Foundation. Given the nature and scale of the organisation as a non-governmental and non-profit entity, the Foundation must carefully balance its operational priorities and financial resources, which currently limit the extent to which it can directly invest in formal professional development initiatives for contracted trainers. Nevertheless, FHRD already supports trainers' professional growth through a number of measures. Trainers meet annually with FHRD CEO to discuss programme delivery, feedback, and emerging training needs. In addition, trainers are offered discounted access to FHRD events and initiatives, and are, where appropriate, invited to participate as speakers and contributors during seminars, conferences, and events organised by the Foundation. These opportunities contribute towards continued professional exposure, networking, knowledge-sharing, and engagement with current HR and training practices. FHRD will continue exploring practical and sustainable ways through which it may further support the continuous development of its contracted trainers within its operational realities and resources.	
Standard 6:		
R6: The FHRD could formalise and document its	FHRD acknowledges the Panel's recommendation regarding the formalisation and documentation of	

programme monitoring and review procedures. This will ensure that all monitoring activities that are currently taking place will clearly be stated within one documented procedure. This would further strengthen consistency, transparency, and institutional quality assurance processes.	programme monitoring and review procedures within a structured framework. In response to this recommendation, FHRD has updated its Quality Manual to include a formalised and documented Programme Monitoring and Review procedure. While programme monitoring activities were already being undertaken through various mechanisms, this amendment strengthens consistency, transparency, and institutional quality assurance by clearly outlining the processes, responsibilities, and review mechanisms in place. The following clause has now been incorporated into the Quality Manual: **<u>Programme Monitoring and Review</u>** FHRD is committed to ensuring that all its programmes are subject to regular, structured monitoring and review. To formalise this commitment, FHRD has established the following documented procedure for programme monitoring and review. Programme monitoring activities are carried out through the following mechanisms: Student feedback – Feedback is collected from students at the conclusion of each programme through structured evaluation forms. Results are analysed and used to inform programme improvements. Lecturer/trainer feedback – Trainers and lecturers are encouraged to provide feedback on programme delivery, learning materials, and student engagement on an ongoing basis. Stakeholder consultation – Feedback from HR professionals, employers, and industry bodies is gathered periodically to ensure programmes remain relevant to the local HR landscape. Annual programme review – On an annual basis, the FHRD Team conducts a review of each programme, examining content currency,	

	assessment effectiveness, and alignment with the relevant MQF level and learning outcomes. Programmes Sub-Committee review – The Programmes Sub-Committee collates and reviews findings from all monitoring activities, analyses outcomes, identifies areas for improvement, and formulates recommendations. These recommendations are subsequently presented to the FHRD Board for consideration and approval, taking into consideration market relevance, student outcomes, and stakeholder input. All monitoring outcomes and resulting actions are recorded to ensure consistency, transparency, and institutional accountability. *Refer to Annex 2 for the Quality Manual*	

Standard 7:		
KR5: The FHRD should adopt a formal appeals procedure within six months of the publication of this report.	FHRD acknowledges the Panel's recommendation regarding the adoption of a formal appeals procedure. The development of a formal appeals process had already commenced prior to the onsite audit, with an initial process being piloted in December 2025 following internal discussions on strengthening institutional procedures and student safeguards. During the onsite audit, the Panel's observations further reinforced the importance of formalising this process within the institution's documented procedures. Subsequently, the appeals procedure was formally discussed and approved by the Programmes Sub-Committee during its meeting held on 30 April 2026. The process has now been formally adopted and integrated into FHRD's operational procedures. The appeals documentation clearly outlines the stages of the process, applicable timelines, responsibilities, and the principles of fairness, transparency, and confidentiality that govern the handling of appeals. In addition, the procedure is now included within the pre-course documentation provided to students prior to programme commencement, ensuring that students are informed of their rights and the mechanisms available to them from the outset of their studies. *Please refer to Annex 5 for the Appeals Procedure and related documentation included within the student pre-course material.*	**Approved in April 2026**.

Standard 8:		
R7: The FHRD could consider further strengthening student support mechanisms, particularly by providing more structured guidance on career development or orientation for new students.	FHRD appreciates the Panel's recommendation regarding the strengthening of student support mechanisms. As a micro-provider primarily catering for mature and working professionals enrolled in short, specialised programmes, FHRD's support approach has traditionally focused on direct accessibility to trainers and practical guidance provided throughout programme delivery. While FHRD recognises the importance of career guidance services, the institution acknowledges that the provision of formal career coaching and guidance requires appropriately qualified and certified professionals and falls beyond the scope of FHRD's current operational structure and remit. In response to the recommendation, FHRD will explore potential collaboration opportunities with the National Skills Council to determine whether external career guidance support may be accessible to students where specialised guidance is required. This approach will allow FHRD to continue maintaining its personalised and accessible learning environment while ensuring that any additional support mechanisms are implemented appropriately and proportionately to the institution's size and nature.	

Standard 9:		
R8: The FHRD could consider further expanding access to digital learning resources to complement the face-to-face delivery format.	FHRD appreciates the Panel's recommendation regarding the further enhancement of access to digital learning resources to complement its face-to-face delivery model. FHRD's accredited programmes are intentionally designed to prioritise direct interaction, discussion, and networking opportunities, reflecting the practical and professional nature of HR-related learning and development. Nevertheless, the institution recognises the value that supplementary digital resources can provide in supporting student engagement and independent learning outside the classroom environment. Currently, students are provided with electronic access to training materials, presentation slides, reading resources, assignment guidance, and additional practical materials shared by trainers, including templates, articles, case studies, and resources relevant to the Maltese HR context. FHRD has also explored the possibility of implementing an online learning platform to further organise and centralise training materials and student resources. Discussions were held with Moodle and PwC Malta to assess potential solutions. However, the investment and recurring annual costs associated with such platforms were considered disproportionate to the institution's current size, delivery model, and available financial resources. Moving forward, FHRD will continue to explore practical and proportionate ways to expand complementary digital learning support, including the increased sharing of curated online resources and additional electronic reference materials. This approach will allow the institution to maintain the strengths of its face-to-face delivery model while progressively enhancing the overall student learning experience through sustainable digital support mechanisms.	

Standard 10:		
N/A		
Standard 11:		
R9: The FHRD could consider including staff involvement in international activities into staff performance review.	The Foundation acknowledges the Panel's recommendation regarding the inclusion of staff involvement in international activities within staff performance reviews. Apart from the CEO, who occupies a full-time executive role, FHRD employs three additional team members: one full-time employee, one employee working 25 hours per week, and another working 16 hours per week. As a non-governmental and non-profit organisation, FHRD operates with limited human and financial resources and therefore maintains a lean operational structure. Given the relatively limited working hours of part-time staff members, together with the Foundation's operational demands, staff participation in international activities may at times present practical limitations. Nevertheless, FHRD already actively involves team members in the management and coordination of its international collaborations and partnerships, in line with their respective roles and responsibilities. With regard to the European Association for People Management (EAPM), of which FHRD is a Full Member, the CEO leads one of the EAPM Working Groups and represents the Foundation in related activities. Broader staff participation can, however, be challenging, as many meetings and collaborative activities are scheduled during evenings and weekends, outside the staff's normal working hours. Moreover, it is important to note that, although FHRD aims to retain its Full Membership within EAPM, Working Group leadership positions rotate every two years among the Heads of Member Foundations to ensure that all 36 EAPM members are given equal exposure and representation. Following the Audit, the FHRD CEO was appointed as a Global Advisory Board Member at the Stirling	

	Centre for Strategic Learning and Innovation, Scotland. The Centre aims to build capacity, provide expert consultancy, and deliver world-class academic and training programmes in Futures Foresight, Strategic Learning, Innovation, and Business Excellence. Inspired by Stirling's heritage and Scotland's legacy of discovery, it fosters bold thinking, lifelong learning, and strategic action, preparing leaders to navigate complexity and drive meaningful change in a rapidly evolving world. In relation to the partnership with the University of Leicester, whereby FHRD acts as the authorised local promoter, the Operations Executive (25 hours per week) is responsible for communications with the University and prospective students, as well as for the planning and coordination of local marketing initiatives in consultation with the CEO. The employee has also completed the "UK Agent and Counsellor Training – Certification Award" to further strengthen her knowledge and contribution in this area. Similarly, the Projects & Events Executive is responsible for managing communication and coordination with AIHR, including the planning and implementation of related marketing initiatives, which are discussed and aligned with the CEO. In addition, the Projects / Training Executive (16 hours per week) was granted full access to AIHR courses in order to further strengthen her HR knowledge and professional development. The Foundation remains committed to supporting staff exposure to international collaboration and learning opportunities within the operational realities and resource limitations of the organisation.	