



Dear Dr Maiki Udam,
Dear Members of the Review Panel,

First and foremost, GMBS would like to sincerely thank you for your evaluation report, as well as for the professional, constructive, and respectful approach demonstrated throughout the entire review process.

We highly appreciate the time, expertise, and attention devoted by the Review Panel to the evaluation of our institution and programme documentation. We also value the insightful observations and recommendations provided in the report, which we consider important for the further development and strengthening of our institutional and quality assurance framework.

GMBS carefully reviewed the report and takes the Panel's observations seriously. We greatly appreciate the professional manner in which the evaluation process was conducted, including the open discussions held during the on-site visit.

With full respect for the work and conclusions of the Panel, GMBS would respectfully like to provide several clarifications concerning factual accuracy and possible misunderstandings related to certain findings. These clarifications are provided solely for the purposes of the factual accuracy review process and aim to further clarify specific aspects of the submitted documentation and evidence that formed part of the accreditation materials and remained available to the Panel throughout the evaluation process.

Please find our comments and clarifications included below.

On behalf of GMBS

13 May 2026

Miroslav Skoda

Statement regarding the panel findings – Standard 6.2

GMBS appreciates the panel's evaluation and wishes to provide several clarifications concerning the factual accuracy and interpretation of the submitted documentation in relation to Standard 6.2.

In this regard, GMBS wishes to clarify that the submitted documents contained extensive evidence of:

- direct employer engagement,
- systematic stakeholder engagement,
- formal stakeholder participation within governance structures,
- evidence-based programme design,
- demonstrable traceability between labour market evidence and curriculum decisions,
- as well as consideration of both the Maltese and wider European context in programme design.

I. Direct Employer Engagement

The document “ Programme Approval Process Documentation”, section “Stakeholder Register”, documented the identification and direct involvement of external stakeholders relevant to MBA programme design and alignment with labour market needs.

This section explicitly identified external stakeholders involved in programme design and review, including:

- Enitech,
- E-learnmedia,
- iTernal,
- DTI University,
- Al Wazzan GmbH,
- BECO Group,
- University Institute of Economic and Legal Sciences.

GMBS further wishes to emphasise that entities such as Enitech, BECO Group and Al Wazzan GmbH did not participate as intermediary consultancy providers, but as direct employers and industry representatives operating within relevant sectors. Their contributions reflected practical labour market needs, required graduate competencies and real-world industry experience related to digital transformation, leadership, online business environments and applied management.

The document “Programme Approval Process Documentation”, section “Industry Stakeholder Focus Group”, further documented direct consultations conducted on 15 January 2025 with representatives of:

- Enitech,
- Al Wazzan GmbH,
- BECO Group.

This stakeholder consultation included discussion regarding:

- curriculum relevance,
- graduate competencies,
- digital transformation,
- practical assessment,
- project-based learning,
- leadership competencies,
- and employer expectations regarding MBA graduates.

The outcomes of this consultation subsequently led to specific recommendations for programme modifications, including:

- strengthening Digital Transformation Strategy content,
- increasing practical assessment elements,
- implementation of cross-cultural case studies,
- and expansion of project-based learning components.

II. Systematic Governance

GMBS further wishes to clarify that stakeholder engagement was not conducted solely through isolated consultations, but was systematically integrated into the institution's formal governance and quality assurance structures.

The document "Programme Approval Process Documentation", section "Minutes of Curriculum Council Meeting (01 Mar 2025)", documented the formal involvement of external stakeholders within the Curriculum Council.

This section confirmed the participation of:

- Jamal Al Wazzan (Al Wazzan GmbH) as external industry expert,
- Full Prof. Milan Konvit as external academic expert,
- Jan Michalec as external student representative.

The same section also explicitly stated that stakeholder consultations were conducted in accordance with Article 76(3) of the GMBS Internal Quality Assurance System and that both internal and external stakeholders were directly involved in programme development and review. The document "Programme Approval Process Documentation", section "Minutes of Accreditation Council Meeting & Resolution (10 Apr 2025)", further documented formal stakeholder participation at the highest level of programme approval and quality oversight.

This section confirmed the participation of:

- Hoangwei Xiong, MA (BECO Group) as External Employer Member,
- Full Prof. Milan Konvit as External Academic Member.

The minutes further explicitly stated that stakeholder feedback had been incorporated into:

- practical projects,
- digital strategy content,
- programme structure refinements,
- assessment improvements,
- and student support mechanisms.

GMBS therefore submits that the submitted documents documented a systematic and formally implemented stakeholder engagement process through internal governance and quality assurance mechanisms, beyond individual or ad hoc consultations.

III. Evidence-Based Design and Traceability

GMBS further wishes to clarify that the submitted documents contained direct evidence of traceability between labour market evidence, stakeholder feedback and implemented curriculum modifications.

The document “Programme Approval Process Documentation”, section “Consultation Outcomes Report”, documented stakeholder recommendations, programme enhancement priorities and implemented curriculum modifications arising from employer consultation processes.

This section documented implementation of the following programme modifications:

- Digital Transformation Strategy integration,
- practical assessment elements,
- cross-cultural case studies,
- Research Methods component,
- Online Learning Orientation session,
- project-based learning components,
- updates to learning outcomes and module descriptors.

The document “Programme Approval Process Documentation”, section “Curriculum Change Log”, further provided direct and auditable traceability between:

- identified labour market needs,

- stakeholder consultation outcomes,
- curriculum modification decisions,
- governance approval,
- and the final programme structure.

This section explicitly documented, inter alia:

- CL-MBA-2025-01: implementation of Digital Transformation Strategy learning outcomes following stakeholder feedback from Enitech,
- CL-MBA-2025-02: revision of assessment structure within the Financial Management module following employer requests for practical assessment,
- CL-MBA-2025-04: implementation of a Research Methods component following recommendations from DTI University,
- CL-MBA-2025-06: introduction of an Online Learning Orientation session following recommendations from E-learnmedia.

GMBS therefore submits that stakeholder feedback was not merely recorded consultatively, but was systematically implemented into programme structure, assessment strategy, learning outcomes and module design through formal quality assurance processes.

IV. Maltese Contextualisation and Labour Market Analysis

GMBS further wishes to clarify that labour market analysis and Maltese contextualisation formed a substantial component of the programme design process.

The document “Evidence of Labour Market Needs Analysis in Designing Programmes” explicitly stated that the MBA programme design was based on an evidence-based programme design logic integrating:

- EU labour market evidence,
- CEDEFOP forecasts,
- Eurostat labour indicators,
- WEF Future of Jobs analysis,
- labour market mapping,
- module-to-competency mapping,
- and traceability between labour market evidence and curriculum decisions.

The same document further contained detailed mapping between:

- identified labour market needs,
- MBA modules,

- assessed competencies,
- assessment methods,
- and programme learning outcomes.

The document “Business Plan”, section “Competition 1/2”, further included analysis of competitors operating within the Maltese higher education environment, including:

- Triagon (Malta),
- Malta Business School (Malta).

This section demonstrated that the strategic positioning of the programme was assessed in relation to the specific Maltese online and business-oriented higher education market.

The document “Business Plan”, section “Business Environment (PEST)”, further explicitly analysed factors relevant to the Maltese environment, including:

- government support for online higher education in Malta,
- Maltese regulatory requirements,
- compliance with European educational standards,
- favourable taxation conditions for educational institutions,
- Malta’s economic growth indicators,
- internet penetration reaching 91.5% of the population,
- technological readiness,
- and the development of e-learning technologies relevant to the online higher education sector.

GMBS therefore submits that the submitted documents contained evidence demonstrating consideration of the Maltese and European labour market environment, strategic positioning and local higher education context during programme design.

GMBS also respectfully wishes to note that the text of Standard 6.2 does not explicitly establish a requirement for labour market needs analysis to be demonstrated specifically or exclusively within the Maltese context.

GMBS submits these clarifications for the purposes of the factual accuracy review process and to clarify certain aspects of the submitted evidence related to Standard 6.2 which may not have been fully reflected in the Panel’s findings.

Indicative evidence

[Programme Approval Process Documentation](#)

[Evidence of Labour Market Needs Analysis in Designing Programmes](#)

[Business Plan](#)

Statement regarding the panel findings – Indicator 6.3

GMBS appreciates the panel's evaluation and wishes to provide several clarifications concerning the factual accuracy and interpretation of the submitted documentation in relation to indicator 6.3(m).

The panel states that no verifiable evidence was provided demonstrating student involvement in programme design and that statements regarding such involvement were not supported by documentation or examples of impact on curriculum development.

GMBS wishes to clarify that the submitted document Programme Approval Process Documentation, included documented evidence of student participation within the programme development and approval process.

Specifically, the section “Minutes of Curriculum Council Meeting (01 Mar 2025)” documented the participation of Mr. Jan Michalec as External Student Representative during the review and approval of the MBA programme proposal.

The section “Minutes of Accreditation Council Meeting & Resolution (10 Apr 2025)” further documented the participation of Mr. Jan Michalec in the Accreditation Council proceedings concerning the approval of the MBA programme.

The same section also documented the reason for the interim student representation arrangement during the pre-licensing phase, namely that GMBS had no enrolled students prior to programme launch. The minutes stated that GMBS invited a second-cycle student from its partner institution, DTI University, to ensure student input during the programme approval process.

Furthermore, the section “Minutes of Accreditation Council Meeting & Resolution (10 Apr 2025)” included a documented example of student feedback and resulting follow-up action within the programme development process.

The minutes recorded that Mr. Jan Michalec recommended stronger guidance regarding:

- assessment expectations,
- grading criteria,
- feedback consistency,
- and grading rubrics for the Final Thesis.

The same section further documented the follow-up action adopted by the Council, namely the instruction to the Programme Sponsor and Quality Assurance Unit to prepare a standardised assessment and feedback framework, including grading rubrics, to be provided to students at programme commencement.



This student feedback and resulting follow-up action were also reflected in the section “Stakeholder Consultation Outcomes Report”, which documented the planned implementation of a standardised assessment and feedback framework in response to the student advisory input provided by Mr. Jan Michalec.

In addition, the “Curriculum Change Log” documented multiple programme modifications arising from stakeholder consultations and internal governance deliberations during the programme development and approval process.

GMBS therefore submits the above clarifications for the purposes of the factual accuracy review and clarification of possible misunderstanding concerning the submitted evidence related to indicator 6.3(m) which may not have been fully reflected in the Panel’s findings.

Indicative evidence

[Programme Approval Process Documentation](#)

Statement regarding the panel findings – Standard 6.6

GMBS appreciates the panel's evaluation and wishes to provide several clarifications concerning the factual accuracy and interpretation of the submitted documentation in relation to Standard 6.6.

The panel states that insufficient evidence was provided regarding systematic and documented stakeholder involvement in programme design, specifically referring to:

- no confirmed student participation,
- no direct employer engagement in Malta,
- limited traceability of stakeholder input into programme outcomes.

GMBS wishes to clarify that the submitted documentation included a systematically documented stakeholder engagement process, including:

- Stakeholder Register,
- Stakeholder Consultation Records,
- Consultation Outcomes Report,
- Curriculum Change Log,
- Curriculum Council minutes,
- Accreditation Council minutes.

The documentation also included the involvement of both internal and external stakeholders, including:

- administrative and QA staff,
- external academic experts,
- external employer stakeholders,
- and a student representative.

The submitted documentation included direct consultations with external employer stakeholders within the Industry Stakeholder Focus Group including representatives of:

- Enitech,
- Al Wazzan GmbH,
- BECO Group.

The documentation also included the Academic & E-Learning Stakeholder Meeting involving:

- DTI University,
- University Institute of Economic and Legal Sciences,
- E-learnmedia,
- iTernal.

GMBS also wishes to clarify that the submitted documentation included the participation of the student representative, Mr. Jan Michalec, in both the Curriculum Council and Accreditation Council proceedings.

The documentation further included a documented example of student feedback and a resulting follow-up action concerning assessment guidance and the grading rubrics framework.

GMBS further wishes to clarify that the submitted documentation included traceability between stakeholder input and programme outcomes through:

- the Consultation Outcomes Report,
- the Curriculum Change Log,
- and Curriculum Council deliberations.

The Curriculum Change Log documented specific programme modifications implemented based on stakeholder input, including:

- Digital Transformation Strategy learning outcome,
- practical assessment changes,
- Research Methods component,
- elective modules,
- Online Learning Orientation session,
- module descriptor revisions.

GMBS also respectfully wishes to note that although Standard 6.6 requires the involvement of external stakeholders, including employers, it does not explicitly specify that such involvement must be ensured exclusively through employers operating in Malta.

GMBS therefore submits the above clarifications for the purposes of the factual accuracy review and clarification of possible misunderstanding concerning the submitted evidence related to Standard 6.6.

Indicative evidence

[Programme Approval Process Documentation](#)

Statement regarding the panel findings – Indicator 11.3

GMBS appreciates the panel's evaluation and wishes to provide several clarifications concerning the factual accuracy and interpretation of the submitted documentation in relation to indicator 11.3.

The panel states that during the visit it did not identify a clear example of active participation of local employers or professional representatives in committees or structured programme-related discussions.

GMBS wishes to clarify that during the on-site visit the panel was presented with evidence of the involvement of local Maltese stakeholders in institutional activities and quality-related discussions.

Specifically, the panel (Mr. Keith Aquilina) was provided with a technical report and professional evaluation of the planned LMS system prepared by Malta Quality Education (ARP Group Ltd) in relation to the technical and quality assurance aspects of the online delivery environment, which may be understood as involvement in institutional activities as referred to in indicator 11.3.

During the on-site visit, the panel was also informed on several occasions about the initiated cooperation with another Maltese stakeholder in the field of quality assurance, namely Edu Alliance represented by Mr. Martin Borg.

GMBS therefore submits the above clarifications for the purposes of the factual accuracy review and clarification of possible misunderstanding concerning the submitted evidence related to indicator 11.3 which may not have been fully reflected in the Panel's findings.

Sources

*[Programme Approval Process Documentation](#)

*[Evidence of Labour Market Needs Analysis in Designing Programmes](#)

* The documents were submitted on 16 January 2026 at the request of the Panel and have remained continuously available on the website https://gmbs-quality-assurance.webnode.sk/?_gl=1*x0tafs*_gcl_au*MTlwNjc2NTM5OS4xNzc4MjI0OTMx since that date. Receipt of the email containing the documents was confirmed by Ms Xuereb Sibby on 19 January 2026.

[Business Plan](#)

All of the above documents were submitted as part of the accreditation process and were available to the panel during the evaluation process.