

### 2013

# **Annual Activity Report**

DG Interpretation

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#### **INTRODUCTION:**

#### The DG in brief

The mission of DG Interpretation is to provide conference interpretation and meeting-related services. It aims at facilitating EU decision-making by allowing participants to communicate effectively.

DG Interpretation is the European Commission's interpreting service and conference organiser, but also provides interpretation to the Council of the European Union, the European Economic and Social Committee, the Committee of the Regions, the European Investment Bank, as well as to a number of European offices and agencies.

For Directorates General and departments of the Commission, DG Interpretation also provides conference organisation capability, technological solutions for multilingual communication and daily technical support to the Commission's meetings and conference facilities.

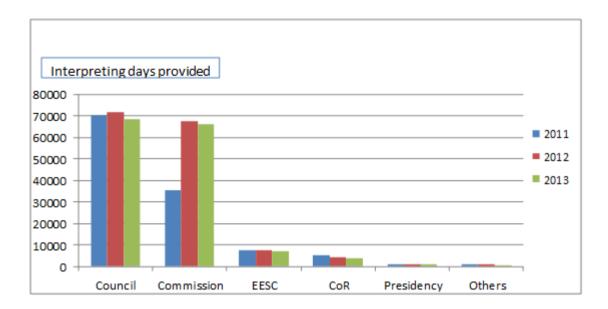
To achieve its mission, DG Interpretation manages continuous training for interpreters and training programmes targeted at universities and students, both in the EU and in third countries.

It operates under administrative expenditures (Heading 5), with a significant share (67.5% in 2013) of its budget accruing from revenues collected from users outside the Commission.

The main risk the DG currently faces in its activities is linked to the increasing unpredictability of demand which is compounded by an overall decrease since 2008.

### The year in brief



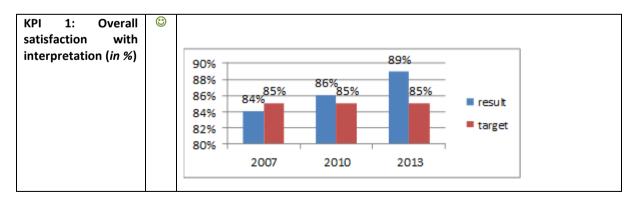


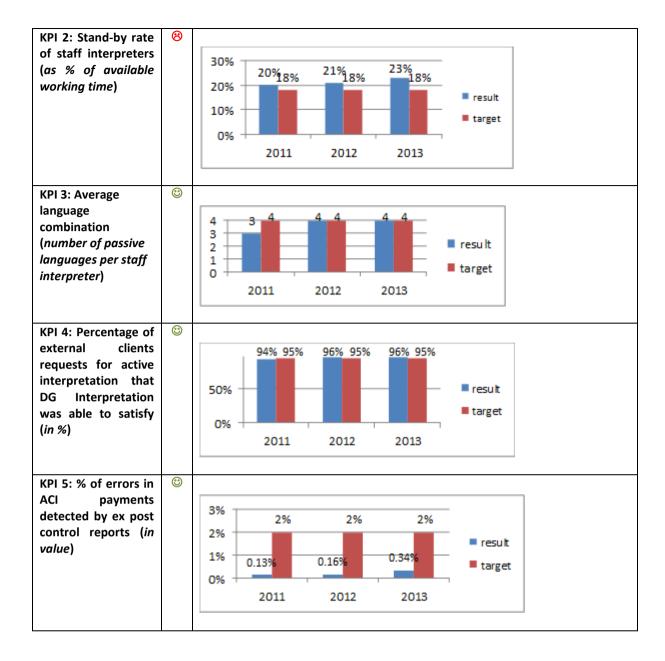
In 2013 DG Interpretation delivered 111.350 interpreting days which represented a decrease of 5% compared to the preceding year. As laid out further down in the document, this decrease was due to an unexpected reduction of demand for interpretation from all SCIC's customers, in particular during the first 6 months of the year, and a structural reduction in the budget that the Council makes available for each language in its working parties.

When Croatian became an official language in July 2013, the Croatian interpreting unit had only 4 temporary staff and heavily depended on AICs: 75% of the Croatian interpretation (990 days for the second semester) was provided by ACIs who were all "non-local" (ie living outside Brussels). The situation is not likely to change soon because the only course in Croatia (Zagreb) had to be suspended until the next academic year due to an insufficient number of suitable candidates. DG Interpretation nevertheless managed to meet demand for this new language, reaching a 100% satisfaction rate in Council and relatively high satisfaction rates also for the EESC and the CDR.

### **Executive Summary**

#### **Key Performance Indicators**





### Policy highlights of the year

The DG's Key Performance Indicators flesh out the highlights of its operations in 2013:

- As a service DG, DG Interpretation aims at measuring the quality of its conference interpreting services through regular customer satisfaction surveys. The 3<sup>rd</sup> CSS carried out over a 2-weeks period in November 2013 confirmed that the efforts undertaken since the previous survey in 2010 led to a rise in satisfaction with interpretation. The 9 points increase in satisfaction with terminology should be particularly underlined and can be explained by the work undertaken in the field of meeting preparation/terminology, thematic training as well as by the enhanced cooperation of some language units with their clients.
- Following a management decision not to cancel ACI contracts in a context of reduced demand, a somewhat higher stand-by rate was accepted. Mitigating actions, such as modulating the recruitment of non-permanent staff, were nevertheless undertaken in the second half of the year to bring the stand-by rate down in 2014.

- Faced with the challenge of ageing and thus the departure of experienced interpreters with more extended language combinations, DG Interpretation organised language training actions for staff and ACIs throughout 2013 to keep the average number of passive languages per head at its current level.
- For the second consecutive year, DG Interpretation managed to exceed the target set for satisfying the demand for active interpretation of our fee-paying clients.

The DG's other policy achievements include:

- DG Interpretation introduced a quality rating for ACIs' additional full active languages ("second active booth"). This will provide the service with a more thorough quality assurance scheme and give ACIs more comprehensive feedback on their professional performance.
- Throughout 2013 DG Interpretation has maintained its efforts to streamline the organisation of ACI accreditation tests. Even if some improvements have already been achieved, inter alia significant savings due to the normalisation of recorded speeches, the complete picture will only be available after the completion of all tests of the 'step two' phase (most of which are still pending). Pre-selection was applied to one test in 2013. As the results did not achieve all expected benefits, SCIC will continue to explore possible adjustments.

#### Key conclusions on resource management and internal control effectiveness

In accordance with the governance statement of the European Commission, the staff of DG Interpretation conduct their operations in compliance with the applicable laws and regulations, working in an open and transparent manner and meeting the expected high level of professional and ethical standards.

The Commission has adopted a set of internal control standards, based on international good practice, aimed to ensure the achievement of policy and operational objectives. As required by the Financial Regulation, the Director-General has put in place the organisational structure and the internal control systems suited to the achievement of the policy and control objectives, in accordance with the standards and having due regard to the risks associated with the environment in which it operates.

DG Interpretation has assessed the effectiveness of its key internal control systems during the reporting year and has concluded that the internal control standards are effectively implemented. DG Interpretation has taken measures to further improve the efficiency of its internal control systems in the area of Processes and Procedures (ICS 8) as reported in Part 3.

In addition, DG Interpretation has systematically examined the available control results and indicators, including those aimed to supervise entities to which it has entrusted budget implementation tasks, as well as the observations and recommendations issued by internal auditors and the European Court of Auditors. These elements have been assessed to determine their impact on the management's assurance as regards the achievement of control objectives. Please refer to Part 2 for further details.

In conclusion, management has reasonable assurance that, overall, suitable controls are in place and working as intended; risks are being appropriately monitored and mitigated; and necessary improvements and reinforcements are being implemented. The Director General, in his capacity as Authorising Officer by Delegation has signed the Declaration of Assurance.

#### Information to the Commissioner

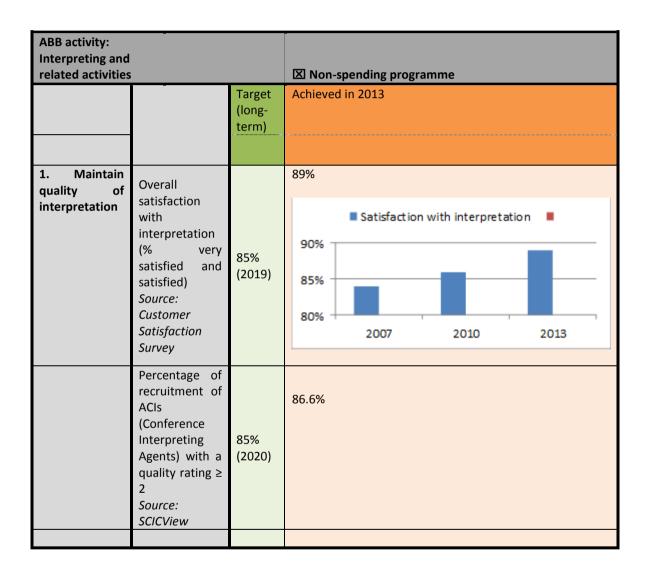
The Annual Activity Report is a management report of the Director-General of DG Interpretation to the College of Commissioners. It is the main instrument of management accountability within the Commission and constitutes the basis on which the Commission takes its responsibility for the management of resources and the achievement of objectives.

The main elements of this report and assurance declaration have been brought to the attention of Commissioner Vassiliou, responsible for Education, Culture, Multilingualism and Youth.

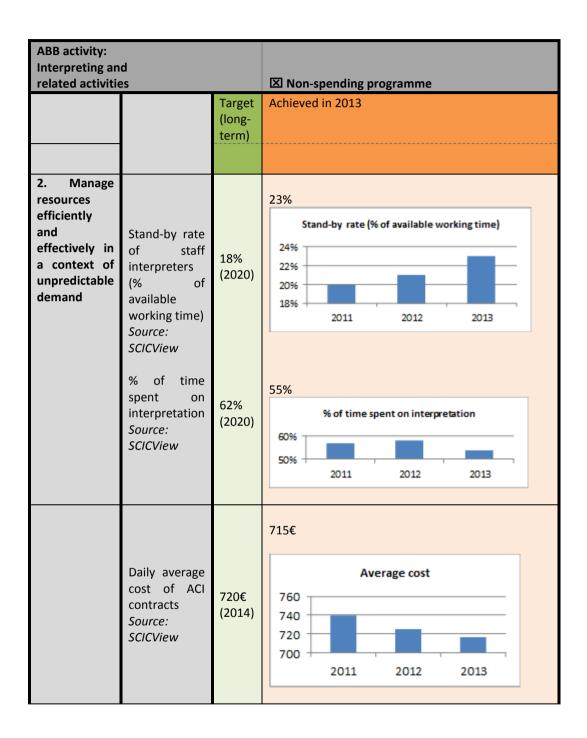
### 1. POLICY ACHIEVEMENTS

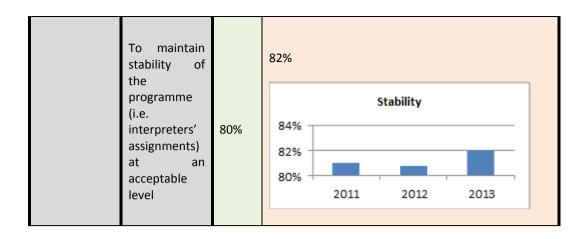
### 1.1 Achievement of general and specific objectives

1.1.1 ABB activity "Interpreting and related activities": The objective "Delivering quality interpretation to SCIC clients" is being implemented according to plan



# 1.1.2 ABB activity "Interpreting and related activities": The objective "Manage resources efficiently and effectively in a context of unpredictable demand" is being implemented with delay





SCIC has set itself long term targets for its staff interpreters' stand-by rate and interpretation rate at 18% and 62% of available working time respectively. The remaining 20% comprise other activities such as training, teaching and selection as well as unforeseen absences. The stand-by and interpretation targets are ambitious targets set to stretch the service and were not met in previous years.

However, 2013 saw a deterioration for both stand-by and interpretation which needs to be explained. Stand-by of staff interpreters in particular moved away from the long term target, rising to close to 23% from 21% the previous year.

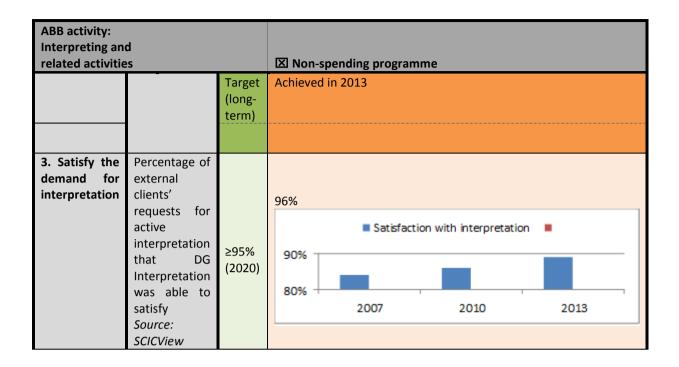
The main reason for this was an unexpected reduction of demand for interpretation from all SCIC's customers at the same time, concentrated in particular in the first 6 months of the year: meeting organisers were forced to postpone certain meetings given the late adoption of the budget for 2013 as well as the delayed conclusion of negotiations for the MFF.

Another reason was a structural reduction in the budget that the Council (the DG's largest user) makes available for each language in its working parties, which lead some member states to make significant changes to their level of demand. The latter changes affected different languages disproportionately. As SCIC's permanent staffing levels are fixed in the medium term, and there is little scope for reallocation of staff between language units, sudden and disproportionate drops in demand lead to surplus capacity, and thus increase in stand-by.

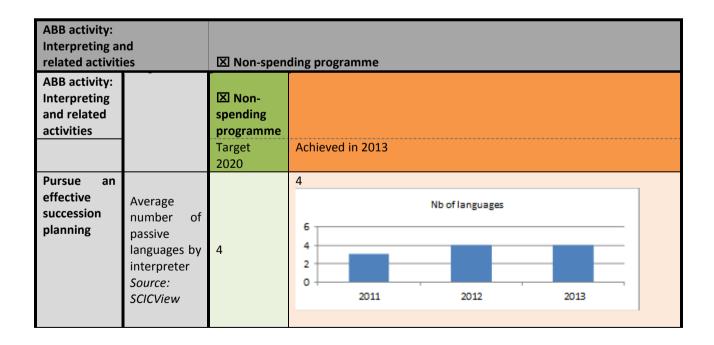
Another complicating factor is that we conduct a significant proportion of our freelance recruitment one year in advance, as part of our efforts to keep down costs and to ensure that we have the services of the best qualified freelance interpreters. A decision was taken at the start of 2013 not to cancel such forward contracts for that year, so as not to destabilise the freelance market, but rather to adjust the level of forward contracts for 2014. In addition, considerable efforts were made to focus on boosting training programmes for staff and freelance interpreters so as to make profitable use of some of the surplus capacity in 2013.

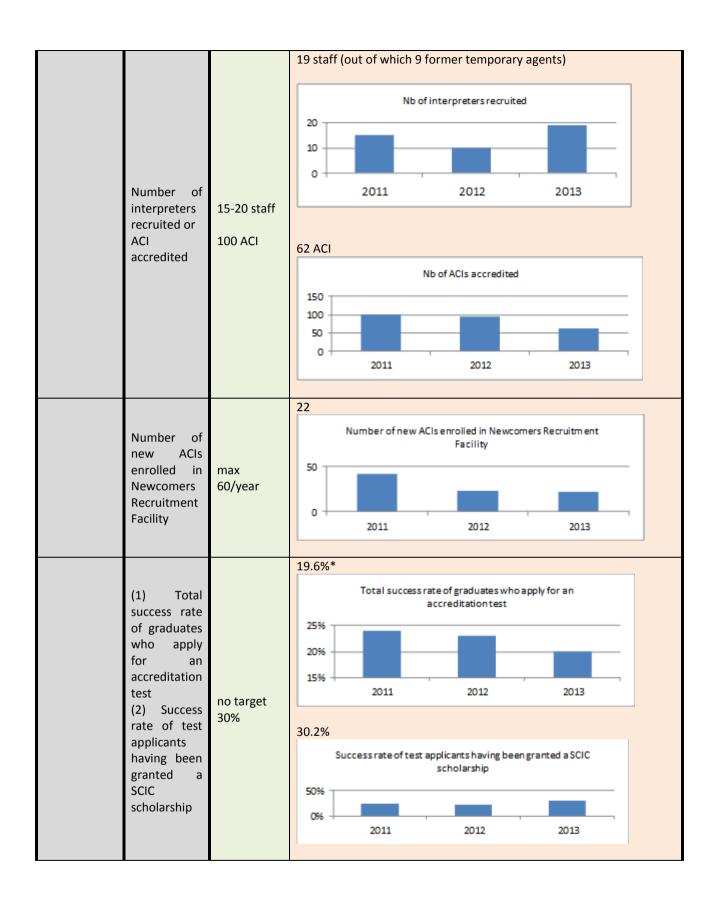
On the positive side, strict cost control of ACI recruitment was maintained and the average daily cost was further reduced to € 715, well below the target of € 725.

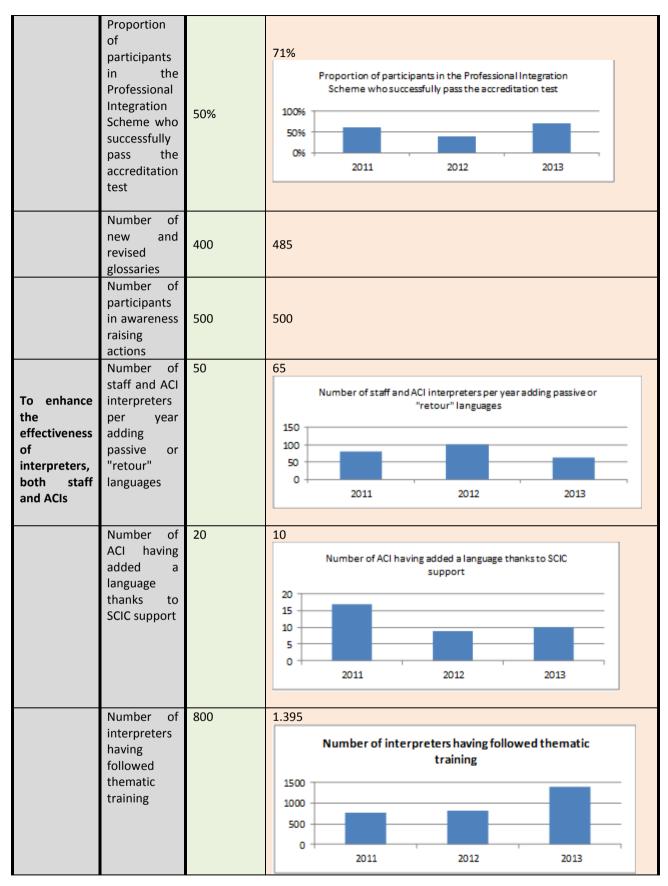
# 1.1.3 ABB activity "Interpreting and related activities": The objective "Satisfy the demand for interpretation" is being implemented according to plan



## 1.1.4 ABB activity "Interpreting and related activities": The objective "Pursue an effective succession planning" is being implemented according to plan







<sup>\*</sup> Depending on accreditation profile, testing may take place in 2 steps (1<sup>st</sup> step: 2 languages tested, 2<sup>nd</sup> step: 3<sup>rd</sup> language tested), 2<sup>nd</sup> step not yet completed for additional 10 participants.

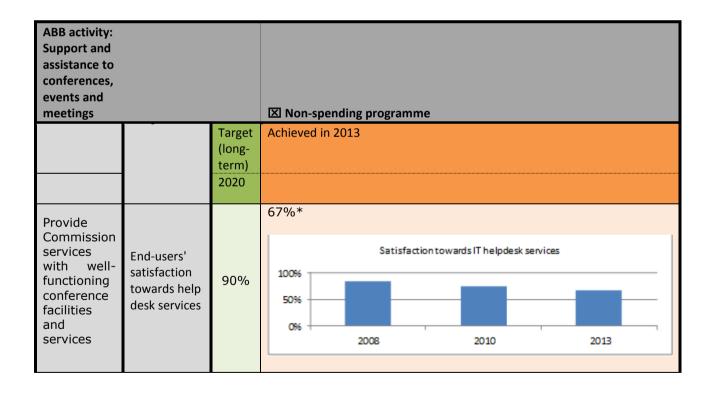
In 2013 DG Interpretation awarded 19 language stays to AICs which took place from April to November 2013. ACIs have a period of six months after the end of the stay to sit the

language addition test. The two ACIs who had to sit the test by the end of the year did so, one added the language, one not. Five more sat a test by the end of the year and two of them added the language. In total three interpreters out of the 19 who benefited from SCIC support in 2013 added the language in 2013. Seven more who had received support in 2011 and 2012 added the languages.

In 2013 DG Interpretation carried out its 5<sup>th</sup> Integration programme (IP5) for 7 participants (with EL, ET, BG, SK mother tongue) to enhance their capacity to sit the inter-institutional accreditation test. Following up on the recommendations of the 4<sup>th</sup> Integration programme, several innovations (mock tests and warm-up exercises for a better stress management and a reduced number of participants and trainers to ensure continuity) generated the highest success rate in the accreditation test up to now, i.e. 71%.

Thorough reflexions about DG Interpretation's objectives for the 2014 Management Plan led to the conclusion that for some indicators targets may be difficult to define (e.g. number of interpreters/ACIs to be recruited, total success rate of graduates in accreditation tests, etc.). For this reason they have been already removed from DG Interpretation's 2014 MP.

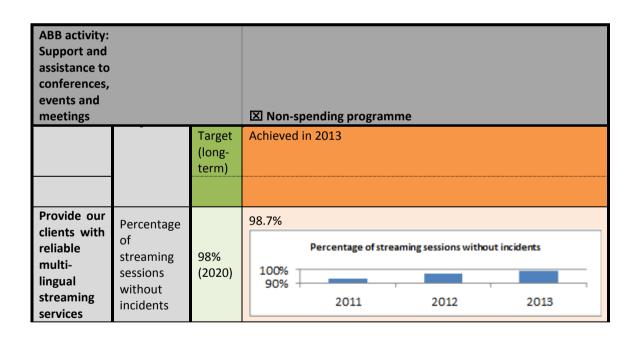
1.1.5 ABB activity "Support and assistance to conferences, events and meetings": The objective "Provide Commission services with well-functioning conference facilities and services" is being implemented according to plan



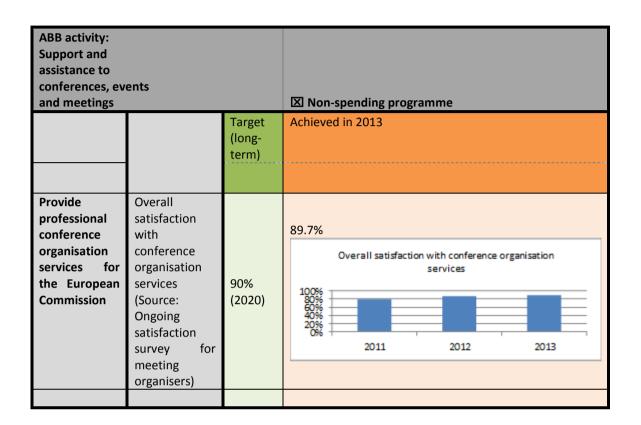
Unavailability of meeting rooms (%, yearly basis) due to:		
- SCIC maintenance	<2%	4.2%
OUD.	na	1.2%
- OIB maintenance		
maintenance		

<sup>\*</sup>In July 2013, DG Interpretation merged its IT and technical/logistical helpdesks. The creation of a single helpdesk was meant to help reduce delays and to provide a clearer and simpler service for all users. The survey carried out among SCIC staff in June 2013 was limited to the satisfaction with the IT helpdesk. The results are far below the target set. As DG Interpretation will join ITIC in 2014, this indicator is meant to be re-evaluated.

1.1.6 ABB activity Support and assistance to conferences, events and meetings: The objective "Provide our clients with reliable multi-lingual streaming services" is being implemented according to plan



1.1.7 ABB activity "Support and assistance to conferences, events and meetings": The objective "Provide professional conference organisation services for the European Commission" is being implemented according to plan



While keeping the same strategic objective, performance and customer satisfaction surveys were sent to each and every DG immediately after the organisation of their conferences by unit S6. The results obtained are expressed in terms of average scores where the contributors had the possibility to rate between 1 and 10 and were collected from the 95 responses received for the period 2012-2013.

Results proved successful with an overall satisfaction of 89.7%, compared to 88.1% in 2012, which translates into a 1.84% increase between these two years.

It is worthwhile to note that the satisfaction with financial management rose from 83.3% to 90.6% (an increase of 8.7 points).

# 1.2 Specific efforts to improve 'economy' and 'efficiency' of spending and non-spending activities.

According to the financial regulation (art 30), the principle of economy required that the resources used by the institution in the pursuit of its activities shall be made available in due time, in appropriate quantity and quality and the best price. The principle of efficiency concerns the best relationship between resources employed and results achieved.

The respect of these principles is continuously pursued through the implementation of internal procedures and predefined practices. These procedures ensure that activities are executed in an efficient manner (e.g. the different workflows contribute to the efficient cooperation between staff, units, etc...) and according to the principle of economy (e.g. the procurement rules ensure procurement in optimal conditions).

DG Interpretation is continuously fine-tuning its internal arrangements in order to improve the efficiency and economy of its operations. The following initiatives (internal and external) show how these principles are implemented in our DG:

### 1.2.1 Deployment of a new "mobile-ready" application for non-permanent interpreters

A new application for the 3,500 non-permanent interpreters managed by DG Interpretation was phased in to allow them to have instant access via a mobile device to their professional calendar used for recruitment by the 3 EU institutions responsible for interpretation. They can also consult and sign contracts proposals (using ECAS). This means that they become immediately available to be assigned to meetings. As interpreters are constantly on the move, the previous system requiring them to log in to a PC to do the same tasks was considerably slower and less user-friendly. Now not only can these interpreters benefit from the speed, flexibility and security of this new application, but operational efficiency has been improved for the interpretation services of the different institutions.

### 1.2.2 Introduction of Automatic Payment Request (APR) system for non-permanent interpreters

2013 marked another milestone for DG Interpretation as concerns the management of documents and processing of ACI payments. Until recently all payment requests and supporting documents from ACI were sent on paper and upon completion of the payment process, were filed. These files were then eventually transferred to the historical archives. Each year, approximately 156.000 pages of documents were handled. The DG developed the application APR (Automatic Payment Request), which allows the electronic transmission of payment requests and scanned supporting documents to DG Interpretation. In 2013 over 41% of payment requests were submitted electronically. In 2013 DG Interpretation took the decision to abandon the old paper based system altogether and make the APR mandatory for every payment request in 2014.

#### 1.2.3 Introduction of a new web-based portal for prospective interpreters

In 2013 DG Interpretation has launched the 'Test' section of the 'Spirit' on-line application

which is accessible to interpreters wishing to sit the accreditation test to work as an Conference Interpreting Agent (ACI) for the EU Institutions. Compared to the previous system, candidates can register via the web and upload the requested documents directly into their application file. This interactive programme allows candidates to follow their dossier on-line at any moment, thus improving the transparency of the selection procedure. In addition, a number of administrative tasks have been semi-automated in the 'back-office' application used by the EU officials responsible for the organisation of inter-institutional accreditation tests, with a view to streamlining procedures.

### 1.2.4 Introduction of videoconferencing with interpretation for the Food & Veterinary Office

Since 2013, DG Interpretation has been providing a permanent videoconferencing link with interpretation (VC+I) for the Directorate General for Health and Consumers, to conduct its expert meetings with its FVO branch in Grange (Ireland). It allowed the Food and Veterinary Office to improve its efficiency (no unnecessary travel time/change in agenda) and cost (less expert missions). This project positioned DG Interpretation as a reliable partner in the Commission's on-going rationalisation projects and its capability to meet new emerging business needs in the Commission and beyond.

#### 2. MANAGEMENT OF RESOURCES

Assurance is an objective examination of evidence for the purpose of providing an assessment of the effectiveness of risk management, control and governance processes. This examination is carried out by management, who monitors the functioning of the internal control systems on a continuous basis, and by internal and external auditors.

The results are documented and reported to the Director-General. The reports produced in DG Interpretation for the purpose of providing assurance during 2013 were:

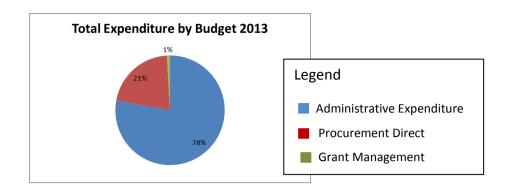
- the reports by AOSDs;
- the contribution of the Internal Control Coordinator, including the results of internal control monitoring at the DG level;
- the reports of the ex-post supervision;
- the opinion and the observations of the Internal Audit Capacity (IAC);
- the observations and the recommendations reported by the European Court of Auditors (ECA). In 2013, there were no audits performed by the Internal Audit Service (IAS).

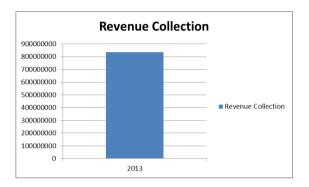
This section reports the control results and other relevant elements that support managements' assurance on the achievement of the internal control objectives<sup>1</sup>. It is structured in three separate sections: (1) the DG's assessment of its own activities for the management of its resources; (2) the assessment of the activities carried out by other entities to which the DG has entrusted budget implementation tasks; and (3) the assessment of the results of internal and external audits, including the implementation of audit recommendations.

DG Interpretation operates under administrative expenditure (*Heading 5*) implemented under centralised direct management. A significant share of its operating budget comes from revenues collected from external clients (67.5% in 2013).

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<sup>&</sup>lt;sup>1</sup> Effectiveness, efficiency and economy of operations; reliability of reporting; safeguarding of assets and information; prevention, detection, correction and follow-up of fraud and irregularities; and adequate management of the risks relating to the legality and regularity of the underlying transactions, taking into account the multiannual character of programmes as well as the nature of the payments (FR Art 32).





# 2.1 Management of human and financial resources by DG Interpretation

This section reports and assesses the elements identified by management that support the assurance on the achievement of the internal control objectives. Annex 5 outlines the main risks together with the control processes aimed to mitigate them and the indicators used to measure the performance of the control systems.

#### 2.1.1 Administrative Expenditure

#### **Control effectiveness as regards Legality and Regularity**

In 2013, DG Interpretation managed **50.4M** € in direct centralised administrative expenditure.

It has set up internal control processes aimed to ensure the adequate management of the risks relating to the legality and regularity of the underlying transactions, taking into account the multiannual character of programmes as well as the nature of the payments concerned.

DG Interpretation must ensure compliance with the provisions defined in The Agreement on Working Conditions and the Pecuniary Regime for Conference Interpreting Agents (ACIs) Recruited by the Institutions of the European Union, which defines their payments and entitlements. These provisions have been built into the DG's applications and business processes and procedures to ensure compliance. Automated procedures for the payment of ACI contracts rely on data processed by an integrated information system (Management of Interpretation and Meetings (MIM)) which manages the assignments of the interpreting staff, meeting booking, recruitment of ACIs, the confirmation that the meeting took place

with the required interpreters and their payments.

Due to the fact that DG Interpretation acts as the EPSO, PMO and HR for the ACIs, the DG is obliged to hold a great deal of personal information of the ACIs. Full compliance with the Data Protection legislation<sup>2</sup> is vital to ensure that sensitive information held by the DG is protected and processed according to the Notification in the Register.

The **control objective** is to ensure that the measured error rate does not exceed 2% annually. Standard ex-ante and ex-post controls are carried out according to the Financial Regulations (art. 66), on the basis of a random sampling for the local contracts (lowest risk level) and an exhaustive control for non-local contracts (i.e. ACIs hired from outside Brussels).

#### **Control efficiency and cost effectiveness**

The principle of efficiency concerns the best relationship between resources employed and results achieved. The principle of economy requires that the resources used by the institution in the pursuit of its activities shall be made available in due time, in appropriate quantity and quality and at the best price.

Within the area of administration expenditure, 3 different areas of expenditure were identified. Where an estimate could be given for the cost of control, the cost/benefit analysis revealed the following:

- Payment of ACI contracts
  - o Budget 2013: 49 million€
  - Total Cost of Controls: 81K € (+/- 0.2% of the budget)
- Professional Training for Interpreters (Officials and ACIs):
  - o Budget 2013: 1.3 million€
  - Total Cost of Controls: 53K€ (+/- 4% of the budget)
- Organisation of inter-institutional accreditation tests for ACI:
  - o Budget 2013: 104K €
  - Total Cost of Controls: 7K € (+/- 7% of the budget)

Where it was not possible to give estimates of the cost of control, an analysis of the control indicators on efficiency indicate that the DG is implementing the objectives as planned.

#### **Fraud Prevention**

DG Interpretation has developed its anti-fraud strategy as foreseen in the Commission's overall anti-fraud strategy<sup>3</sup>.

<sup>&</sup>lt;sup>22</sup> 45/2001

<sup>&</sup>lt;sup>3</sup> COM(2011) 376 24.06.2011

The main expenditure in DG Interpretation is linked to the payment of non-permanent interpreting staff (Conference Interpreting Agents (ACIs)). ACIs are employed when needed by the DG on a contract basis in order to ensure we can meet demand for interpretation and achieve our mission and strategic objectives. The payments to ACI are, for the most, a fully automated and repetitive procedure, with all relevant data managed through a single, integrated information system (Management of Interpretation and Meetings (MIM)). These steps have enabled the DG to reduce the risk of potential fraud or errors to minimal levels.

Within this activity, the reimbursement of the entitlements, such as per diems or transport costs, of the ACIs when on mission is an area where fraud and/or errors could occur with smaller, one-off payments. However, it should be noted that the budget is relatively small and mitigating actions, such as favouring the recruitment of local ACIs, circumvents this risk entirely. In all cases where reimbursements are paid to ACIs, 100% of all requests are verified before payment.

The misuse of personal data or the leakage of this information to third parties has been identified as a possible risk area. In the anti-fraud action plan, further steps have been defined to mitigate the risk including ethics training for ACIs (which has been previously given only to officials) and increased rights for data subjects in line with the forthcoming reforms regarding the data protection legislation.

#### **Control Indicators**

#### **Control efficiency and cost effectiveness indicators**

- The budget for ACI payments in 2013 was 49 million euros and DG Interpretation remained far below the threshold determined for materiality (2%), with a percentage of 0.34% of errors detected by ex-post controls.
- Analysis of the recording of exceptions file has revealed 3 exceptions (1 linked to the
  payment of ACIs and 2 linked to the professional training of ACIs and officials) that
  were reported during 2013 for this area. The exceptions were accepted and where
  necessary action was taken immediately to ensure the appropriate procedures were
  updated and documented.

#### **Anti-fraud indicators**

- The ex-post controls are performed on 100% of all non-local contracts (which is the area which was identified as a possible area for fraudulent activity) and a random sampling of approximately 1.2% (in value) of payments made to local ACIs
- Given the level of risk of fraud associated with non-spending activities, DG Interpretation prioritised the Internal Control Standards 11 (Document Management) and 12 (Internal Communication) in 2013. The DG concentrated on areas such as access to information and the reinforcement of the previous messages on the responsibilities and obligations of staff members with regards to sensitive data and information which is not in the public domain.

#### **Positive Conclusion**

DG Interpretation quantifies the costs of the resources and inputs required for carrying out the controls described in annex 5 and estimates, is so far as possible, their benefits in terms of the amount of errors and irregularities prevented, detected and corrected by these controls.

Overall, during the reporting year the controls carried out by DG Interpretation for the management of the budget appropriations were cost effective, as the estimated quantifiable benefits exceeded the cost in a proportion of 0.3%.

In addition, there are a number of non-quantifiable benefits resulting from the controls operated during the control stages of each of the three areas e.g. the modulated ACI recruitment to reduce staff stand-by on days of lesser activity helping to ensure recruitment and costs are reduced. Furthermore, DG Interpretation considers that the necessity of these controls is undeniable, as the totality of the appropriations would be at risk in case they would not be in place.

#### 2.1.2 Revenue Collection

#### **Legality and Regularity**

In 2013, DG Interpretation collected 83.5M € in revenues charged to its external clients.

It has set up internal control processes aimed to ensure the adequate management of the risks relating to the legality and regularity of the underlying transactions, taking into account the multiannual character of programmes as well as the nature of the payments concerned.

The **control objective** is to ensure that the measured error rate does not exceed 2% annually.

Revenue collection is performed in accordance with the Financial Regulations (Chapter 5, Recovery Operations).

DG Interpretation uses Service Level Agreements (SLAs) with clients where there is a significant volume or frequency of the use of interpretation. SLAs allow uniform and automatic billing and simplified management of the billing system making it more transparent for our external clients. It has allowed the DG to accelerate the process of collecting payments for the provision of interpretation services and reduce the number of billing errors. In 2013, 10 SLAs or agreements were created or renewed and 100% of all invoices are screened before being sent to clients.

#### **Control efficiency and cost effectiveness**

The principle of efficiency concerns the best relationship between resources employed and results achieved. The principle of economy requires that the resources used by the

institution in the pursuit of its activities shall be made available in due time, in appropriate quantity and quality and at the best price.

In 2013, 67.5% of DG Interpretation's budget was accrued by revenues collected from external clients.

#### **Fraud Prevention**

DG Interpretation has developed its anti-fraud strategy as foreseen in the Commission's overall anti-fraud strategy<sup>4</sup>

In the risk assessment exercise of the DG, the risk of fraud linked to this activity is minimal. This is due to the fact that the DG has a fully integrated system which contains all information concerning the booking of meeting rooms and interpreters by external clients. Each step of the process is controlled and monitored in MIM (Meeting and Interpretation Management) system and requires the verification and or authorisation of staff across different Units and Directorates in the DG.

#### **Control Indicators**

#### Control efficiency and cost effectiveness indicators

- In 2013, a control indicator was introduced to monitor the accuracy of billing by checking the number of billing enquiries and the value of corrections made. The total number of enquiries during the year was 7, for a value of 89K € - giving an error rate of 0.1%
- In 2013, the total amount of i-slots (the unique accounting unit for interpretation services an i-slot roughly represents a half day assignment for an interpreter) billed to clients in 2013 was 83,463,600€. The cost of control is 224,400€ per year, representing 0.27% of the total revenue collected.

#### **Positive Conclusion**

DG Interpretation quantifies the costs of the resources and inputs required for carrying out the controls described in annex 5 and estimates, is so far as possible, their benefits in terms of the amount of errors and irregularities prevented, detected and corrected by these controls.

Overall, during the reporting year the controls carried out by DG Interpretation for the management of the budget appropriations were cost effective, as the estimated quantifiable benefits exceeded the cost in a proportion of 0.27%.

In addition, there are a number of non-quantifiable benefits resulting from the controls operated during the ex-ante stages e.g. the integrated real-time management of meeting requests and interpreters' assignments. Furthermore, DG Interpretation considers that the

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<sup>&</sup>lt;sup>4</sup> COM(2011) 376 24.06.2011

necessity of these controls is undeniable, as the totality of the appropriations would be at risk in case they would not be in place.

#### 2.1.3 Procurement Direct

#### **Legality and Regularity**

In 2013, the amount of procurement directly managed by DG Interpretation was **7.6M** €. **5.7M** € were managed under codelegation.

It has set up internal control processes aimed to ensure the adequate management of the risks relating to the legality and regularity of the underlying transactions, taking into account the multiannual character of programmes as well as the nature of the payments concerned. The control objective is to ensure that the procedures are followed and the DG is fully compliant with the decisions and regulations of the Commission.

All procurement procedures comply with the Financial Regulations (Title V. Public Procurement).

For the purposes of this exercise, DG Interpretation has split the procurement procedure into two sub-groups: the standard procurement procedure (used mainly for the supply of IT related services and equipment, technical services and equipment for interpretation and audio-visual services provided by the DG); and procurement procedures undertaken as part of conference organisation under co-delegated procedure.

In 2013 DG Interpretation was entrusted with the financial management of 15 co-delegated events which were completed to a high standard, reflected in the satisfaction indicator in Part I.

In addition, due to measures taken following the recommendations of an audit assignment of the IAC in 2012, there have been improvements in the planning of procurement procedures in the area of co-delegated conferences. These improvements have been put in place for 2013 so that:

- The DG has actively requested all DGs submit 6 monthly plans for conferences and seminars where DG Interpretation is likely to intervene.
- Closer cooperation between the financial unit and the conference organisation unit to ensure that, as far as possible, any large procurement procedures, particularly those leading to framework contracts, are planned well in advance. This has ensured that the correct procedure was selected and the tender specifications were clear. In doing so, there has been a reduction in the number of recording exceptions (2 in 2013) and a significant reduction in the number of negative comments given by the Financial Verification Agent (3 in 2013). The nature of the business does mean that there are always last minute requests from DGs when organising large events and consequently there were 65 remarks made by the FVA on the checklist. This area will continue to be monitored in 2014 and ICS 8 (Procedures and Processes) has been identified as a priority standard.

#### **Control efficiency and cost effectiveness**

The principle of efficiency concerns the best relationship between resources employed and results achieved. The principle of economy requires that the resources used by the institution in the pursuit of its activities shall be made available in due time, in appropriate quantity and quality and at the best price.

Within the area of procurement management, 2 different templates for expenditure were created. Where an estimate could be given for the cost of control, the cost/benefit analysis revealed the following:

- Procurement Direct for DG Interpretation:
  - o Budget 2013: 7.6 million €
  - o Total Cost of Controls 2013: 587K € (+/- 8% of the budget)
- Conference Organisation under co-delegated procedure:
  - Budget 2013: 5.7 million €
  - Total Cost of Controls 2013: 304K€ (+/- 5% of the budget)

The introduction of framework contracts in the area of technical equipment has increased the efficiency by which the DG works. Using framework contracts has ensured more standardised material in rooms managed by SCIC. This in turn, improves the availability of equipment meaning that the time delay between ordering replacement equipment and the installation is less, reducing the amount of time that rooms are not available for use.

The introduction of a number of framework contracts (3 for technical services/equipment) and 3 in the area of conference management – and each of the 3 framework contracts in this area are broken down into a further 3 lots bringing the total to 9) is reflected in a higher percentage of the cost of controls.

#### **Fraud Prevention**

DG Interpretation has developed its anti-fraud strategy as foreseen in the Commission's overall anti-fraud strategy<sup>5</sup>.

DG Interpretation operates a small budget and the bulk of its financial transactions is fully automated which means that the risk of fraud is very minimal. The DG has set out measures aiming at minimising the risks of fraud through its Control strategy, which foresees ex-ante controls, four eyes review principle for any financial transactions and ex-post controls on a significant part of the budget (risk-based sample + at random sample).

However, the issue of a low number of economic operators in the field of the specialist technical equipment required by the DG to provide interpretation and audio-visual services was identified in the anti-fraud strategy of the DG as a potential risk. The introduction of framework contracts has increased the number of replies to tenders has enabled the DG to

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<sup>&</sup>lt;sup>5</sup> COM(2011) 376 24.06.2011

reduce the risk.

Further investigation into creating a panel of experts from horizontal DGs to review procurement procedures has been identified in the anti-fraud strategy action plan to decide whether this can add further value to the current procedure.

Procurement for IT related expenditure uses the framework contracts of DIGIT, mitigating the risk of fraud in this area.

#### **Control Indicators**

#### Control efficiency and cost effectiveness indicators

- Percentage of time rooms were unavailable due to SCIC Maintenance In 2013, 4.2% of rooms were unavailable during the year due to SCIC maintenance.
- Percentage of streaming sessions without incident 98.7% of all meetings in 2013 with streaming went ahead with no reported incidents.

#### **Anti-fraud indicators**

- 100% of all procedures go through a formal evaluation process which is fully documented.
- Number of exceptions reported in total in 2013 9 exceptions were reported. The majority were linked to the nature of the business and the need to respond and replace or repair faulty equipment.

#### **Positive Conclusion**

DG Interpretation quantifies the costs of the resources and inputs required for carrying out the controls described in annex 5 and estimates, is so far as possible, their benefits in terms of the amount of errors and irregularities prevented, detected and corrected by these controls.

Overall, during the reporting year the controls carried out by DG Interpretation for the management of the budget appropriations were cost effective, as the estimated quantifiable benefits exceeded the cost in a proportion of 7%.

In addition, there are a number of non-quantifiable benefits resulting from the controls operated during the planning control stages e.g. the implementation of framework contracts, which imply a greater amount of control but are of benefit to DG Interpretation as well as the Commission in improving the efficiency of the procurement procedure. Furthermore, DG Interpretation considers that the necessity of these controls is undeniable, as the totality of the appropriations would be at risk in case they would not be in place.

#### 2.1.4 Grant Management Direct

#### **Legality and Regularity**

In 2013, DG Interpretation managed only 600K € in direct grant management.

It has set up internal control processes aimed to ensure the adequate management of the risks relating to the legality and regularity of the underlying transactions, taking into account the multiannual character of programmes as well as the nature of the payments concerned. The control objective is to ensure that the procedures are followed and comply with the relevant decisions and regulations of the Commission.

All grant management procedures comply with the Financial Regulations (Title VI.Grants) and the Commission Decision on the adoption of the 2013 annual work programme on financial support for training in conference interpreting (C(2013)1566) which provides the procedure for both the grants to Universities and the bursaries to students.

#### **Control efficiency and cost effectiveness**

The principle of efficiency concerns the best relationship between resources employed and results achieved. The principle of economy requires that the resources used by the institution in the pursuit of its activities shall be made available in due time, in appropriate quantity and quality and at the best price.

Where an estimate could be given for the cost of control, the cost/benefit analysis revealed the following:

- Grant Management for DG Interpretation:
  - o Budget 2013: 600K €
  - o Total Cost of Controls 2013: 119K € (+/- 20% of the budget)

The expected benefits of this action are to eventually recruit interpreters.

In ex-post controls, no errors were detected and in 2013, there were no exceptions recorded for this area.

#### **Fraud Prevention**

DG Interpretation has developed its anti-fraud strategy as foreseen in the Commission's overall anti-fraud strategy<sup>6</sup>

Bearing in mind the very limited budget, possible fraudulent behaviour within this area was not identified as a priority in the DG's anti-fraud strategy.

However, the standard ex-ante and ex-post are carried out to a high standard. All final reports are desk reviewed by the programme officer and random checks are carried out to

<sup>&</sup>lt;sup>6</sup> COM(2011) 376 24.06.2011

identify possible 'suspicious' items. Final grant payments (in most cases 50% of the awarded grant) are only made after satisfying documentation/explanation has been received. Also, during the grant period DG SCIC obtains reports from its pedagogical assistants on the implementation of the co-financed action. Possible ex-post findings are taken into consideration for improving ex-ante controls.

#### **Control Indicators**

#### **Control efficiency and cost effectiveness indicators**

• Number of exceptions reported – in total in 2013, 0 exceptions were reported.

#### **Positive Conclusion**

DG Interpretation quantifies the costs of the resources and inputs required for carrying out the controls described in annex 5 and estimates, is so far as possible, their benefits in terms of the amount of errors and irregularities prevented, detected and corrected by these controls.

Overall, during the reporting year the controls carried out by DG Interpretation for the management of the budget appropriations were cost effective, as the estimated quantifiable benefits exceeded the cost in a proportion of 20%.

As explained, there are a number of non-quantifiable benefits resulting from the controls operated during the initial control stage e.g. the importance of staying visible and providing a framework where Universities and students can continue to offer courses and study in a very specialist area. Furthermore, DG Interpretation considers that the necessity of these controls is undeniable, as the totality of the appropriations would be at risk in case they would not be in place.

# 2.2 Budget implementation tasks entrusted to other services and entities.

This section reports and assesses the elements that support the assurance on the achievement of the internal control objectives as regards the results of the DG's supervisory controls on the budget implementation tasks carried out by other Commission services and entrusted entities distinct from the Commission.

Not applicable

**Cross-sub-delegations** 

Not applicable

**Executive Agencies** 

Not applicable

# 2.3 Assessment of audit results and follow up of audit recommendations

This section reports and assesses the observations and conclusions reported by auditors which could have a material impact on the achievement of the internal control objectives, and therefore on assurance, together with any management measures taken in response to the audit recommendations.

The DG is audited by both internal and external independent auditors: its internal audit capability (IAC), the Commission internal audit service (IAS) and the European Court of Auditors (ECA).

During the period of reference, the IAC finalised 2 audits assignments in addition to the continuous follow-up of previous recommendations, in accordance with its multiannual audit planning, which covers the DG management processes, on a risk basis, over a period of five years.

Consequently, the IAC expressed the opinion that the internal control system in place provided reasonable assurance regarding the achievement of the business objectives set up for the processes audited except for two very important qualifications related to the audit "Technical support of meetings and conferences".

Management has accepted all the auditors' recommendations and submitted action plans which have been assessed favourably by the auditors. The various management measures included in these action plans have been or are being implemented as foreseen.

As regards the implementation of recommendations issued in previous years, the relevant action plans have been implemented as planned. All 20 outstanding recommendations have been implemented in the course of 2013.

In the framework of the Statement of Assurance concerning the financial year 2013 (or DAS 2013), the Court of Auditors (ECA) carried out an audit of 2 transactions from a sample of administrative expenditure of the Commission. The audit did not give rise to any observation.

# 3. ASSESSMENT OF THE EFFECTIVENESS OF THE INTERNAL CONTROL SYSTEMS

The Commission has adopted a set of internal control standards, based on international good practice, aimed to ensure the achievement of policy and operational objectives. In addition, as regards financial management, compliance with these standards is a compulsory requirement.

DG Interpretation has put in place the organisational structure and the internal control systems suited to the achievement of the policy and control objectives, in accordance with the standards and having due regard to the risks associated with the environment in which it operates.

DG Interpretation annually assess the effectiveness of its key internal control systems, including the processes carried out by implementing bodies in accordance with the applicable Commission guidance. The assessment relies on a number of monitoring measures and sources of information including:

- the reporting from the relevant services on the priority standards for 2013;
- the Management Self-Assessment survey organised in April 2013 using the i-CAT tool specifically developed for this purpose;
- the mid-term Risk Assessment exercise;
- the internal audit findings and recommendations related to the compliance with the ICS;
- the analysis of the exception reporting within the DG
- and an analysis of the Risk Register of the DG.

In its management plan for the reporting year, DG Interpretation had foreseen a number of measures to improve the effective implementation of ICS 8 on Processes and Procedures, ICS 11 on Document Management and ICS 12 on Internal Communication. By the end of the reporting year, these measures are still being implemented and full implementation is expected by the end of 2014.

As a result of this, two of the Internal Control Standards remain as priorities for the coming year (ICS 8 & ICS 12) taking additional measures to reinforce the assurance provided which will be in place by the end of 2014.

In the external environment in which DG Interpretation operates, one of the main uncertainties it faces is the unpredictability of demand which is aggravated by an overall decrease in demand since 2008. Whilst these events cannot be controlled by the DG, the mitigating actions put in place allow management to be made aware, in a timely fashion, the extent to which the DG is moving towards the achievement of its mission and strategic objectives. Demand for interpretation is under constant monitoring and has led, for example, to a modified policy in the recruitment of ACIs over the long, medium and short-term.

Conversely, with regard to reporting and compliance, DG Interpretation is able to control this internal environment more effectively and provide reasonable assurance of meeting those objectives. Within this sphere of activity, the DG handles a great deal of sensitive information which was documented in the DG's Risk Register and was the reason ICS 11 – Document Management was prioritised in 2013. During 2013, the DG detailed the systems, what information they hold and who has access to what. Based on this table, a series of changes were introduced, which will continue into 2014 on access to information focusing on the "need to know" principle.

This aspect of risk was also identified in the DG's anti-fraud strategy and a number of actions were taken to make staff aware of their responsibilities and obligations with regard to the information to which they have access. These actions will continue in 2014 but be undertaken as part of improvements to our Processes and Procedures (ICS 8) which has been prioritised for 2014.

Concerning the overall state of the internal control system, generally the DG complies with the three assessment criteria for effectiveness; i.e. (a) staff having the required knowledge and skills, (b) systems and procedures designed and implemented to manage the key risks effectively, and (c) no instances of ineffective controls that have exposed the DG to its key risks.

Further enhancing the effectiveness of the DG's control arrangements in place, by inter alia taking into account any control weaknesses reported and exceptions recorded, is an ongoing effort in line with the principle of continuous improvement of management procedures.

In conclusion, the internal control standards are effectively implemented and no systemic weaknesses have been detected.

#### 4. MANAGEMENT ASSURANCE

This section reviews the assessment of the elements reported in Parts 2 and 3 and draw conclusions supporting of the declaration of assurance and namely, whether it should be qualified with reservations.

### 4.1 Review of the elements supporting assurance

The information reported in Parts 2 and 3 stems from the results of management and auditor monitoring contained in the reports listed. These reports result from a systematic analysis of the evidence available. This approach provides sufficient guarantees as to the completeness and reliability of the information reported and results in a complete coverage of the budget delegated to the Director-General of DG Interpretation.

#### 4.2 Reservations and overall conclusion on assurance

Not applicable

#### **DECLARATION OF ASSURANCE**

I, the undersigned,

**Director-General of DG Interpretation** 

In my capacity as authorising officer by delegation

Declare that the information contained in this report gives a true and fair view<sup>7</sup>.

State that I have reasonable assurance that the resources assigned to the activities described in this report have been used for their intended purpose and in accordance with the principles of sound financial management, and that the control procedures put in place give the necessary guarantees concerning the legality and regularity of the underlying transactions.

This reasonable assurance is based on my own judgement and on the information at my disposal, such as the results of the self-assessment, ex-post controls, the work of the internal audit capability for years prior to the year of this declaration.

Confirm that I am not aware of anything not reported here which could harm the interests of the institution.

Brussels, 26/03/2014

Signed

Marco Benedetti

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<sup>&</sup>lt;sup>7</sup> True and fair in this context means a reliable, complete and correct view on the state of affairs in the service.