European
Commission

Annual activity report
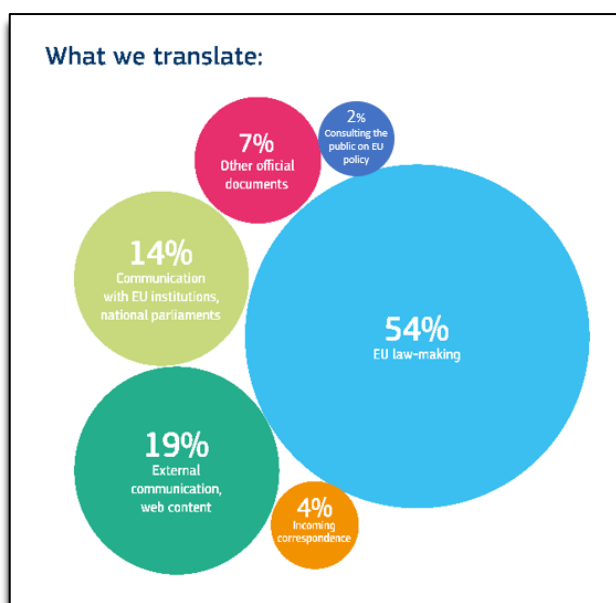# 2022

DG TRANSLATION

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DG TRANSLATION IN BRIEF

DG Translation (DGT)'s overarching goal is to provide the European Commission with **high-quality translations and other linguistic services in 24 languages.** Alongside translation work, which is the biggest part of its core business, DGT also provides other services, including editing and linguistic advice, language localisation and machine translation. These activities are mostly demand-driven and supported by quality management, terminology work, outsourcing and administrative functions.

What we translate:
- 2% Consulting the public on EU policy
- 7% Other official documents
- 14% Communication with EU institutions, national parliaments
- 54% EU law-making
- 19% External communication, web content
- 4% Incoming correspondence

DGT's job is to provide the services necessary to respect the European Union's (EU) multilingual character by making sure the Commission produces **clearly written documents** in all the EU official languages and in other languages where needed. By making legislation and information available to people in a language they understand, DGT enables the Commission to communicate better with EU citizens and **make the EU more open, accountable and democratic**. Its efforts underpin the EU's legitimacy and help ensure that its citizens can enjoy their rights to the full.

In its daily work to pursue its mission, DGT aims to be a full partner in the legislative and communication processes, the hub for all translation-related activities in the Commission and a reference in the world of translation. It also endeavours to contribute to the development of each EU official language and to the wider translation profession.

In collaboration with the Directorate-General for Communications Networks, Content and Technology (DG CNECT) and the Directorate-General for Informatics (DG DIGIT) under the digital Europe programme, DGT also helps put into practice the institutions' commitment to **digital multilingualism** by expanding its secure and reliable, EU-developed machine translation service, **eTranslation** and by working on a **speech-to-text service**.

DGT is a 'trans-Ardennes' Directorate-General, with staff distributed evenly between Brussels and Luxembourg. It also has field officers in all Member States except Belgium and Luxembourg.

EXECUTIVE SUMMARY

This annual activity report is a management report of the Director-General of DGT to the College of Commissioners. Annual activity reports are the main instrument of management accountability within the Commission and constitute the basis on which the College takes political responsibility for the decisions it takes as well as for the coordinating, executive and management functions it exercises, as laid down in the treaties ([1]).

([1])   Article 17(1) of the Treaty on European Union.

A. Key results and progress towards achieving the Commission's general objectives and department's specific objectives

Contribution to the Commission's objectives

DGT contributes to the Commission's general objective of **'a modern, high-performing and sustainable European Commission'** by providing a world-class quality **translation** service in the 24 EU official languages and an **editing** service as part of the drafting process, to make the language clear, correct and more concise. Over the reporting period, DGT enabled the Commission to take swift action on its political priorities and adopt several urgent legal acts in response to Russia's war of aggression against Ukraine and to the energy and supply chain crises. DGT's multilingual support included rapidly responding to the sudden demand for translation into both Ukrainian and Russian and translating major political packages. It included delivering several highly technical and high-profile packages in the energy, finance, space, defence, environment, health and trade policy areas.

DGT also contributes to the general objective of making **'Europe fit for the digital age'** by providing a secure and reliable EU-owned, machine translation system based on artificial intelligence (AI), **eTranslation**, which is an integral part of DGT's core business. eTranslation is used as a working tool in DGT and other translation services of the EU institutions and is made available as a stand-alone service to all Commission departments. It is also available to public administrations, small businesses, NGOs and universities across the EU. Over the reporting period, DGT continued to improve eTranslation's linguistic quality and, in fewer than ten days, expanded its language coverage to include Ukrainian.

Challenges given the context

To deliver on the Commission's priorities, DGT continued to face **sustained high demand**, combined with **unstable texts,** numerous **document versions** and **tight deadlines**. Along with ongoing reductions of in-house staff, this led to **increased pressure on resources**. To address these challenges, DGT designed a **set of measures to manage demand** to be implemented together with the Secretariat-General and other Commission departments.

Despite these challenges, DGT remained fully committed to delivering **fit-for-purpose translations.** It continued to apply **sound workflow management** to prioritise tasks and focus its in-house resources on the most sensitive, difficult, or urgent files. DGT also **outsourced a significant number of pages** to meet the high demand and deliver timely quality translations. It applied targeted quality control based on risk assessment and used the full potential of its suite of translation tools. Across DGT, staff spared no efforts to respond to unpredictable, urgent, and highly demanding requests with flexibility and team spirit. This demonstrated once again the value for the Commission of having a core of highly skilled staff working in a fully digitalised workplace, alongside a reliable and professionally qualified pool of external contractors.

Highlights for 2022

DGT ENABLED THE COMMISSION TO DELIVER ON ITS POLITICAL PRIORITIES AND RESPOND PROMPTLY TO NEW CHALLENGES.

DGT produced **2 597 000** pages, its second highest volume after the peak in 2021 of 2 770 000 pages. DGT supported the Commission's intense work to respond to **Russia's aggression against Ukraine** and to the **energy and supply chain crises**. It met **very high and unpredictable demand** with **extremely short deadlines**, including by putting in place special arrangements for translations from and into Ukrainian and Russian.

The derogation regime for translation into Irish ended, and **Irish moved to full language regime**, with the same status as the other EU official languages.

DGT USED ITS RESOURCE MIX EFFICIENTLY TO MEET URGENT DEMAND.

DGT continued to rely on its **flexible resource structure** combining permanent and temporary staff, outsourcing and language technology. It **outsourced 36.6% of its production,** amounting to **951 000 pages**, and prepared a new call for tenders for the outsourcing of translation, to be published in 2023 (TRAD23).

eTRANSLATION ENABLED MULTILINGUAL COMMUNICATION WHERE HUMAN TRANSLATION WAS NOT AVAILABLE.

Demand for **machine translation** continued to grow. DGT continued to provide eTranslation for the Europa websites, including high-profile platforms such as **Re-Open EU** and the **Conference on the Future of Europe**. In March, it added **Ukrainian** to the languages offered by eTranslation in fewer than ten days.

DGT launched the **eTranslation advisory service** to promote eTranslation and provide Commission departments with guidance on its use.

DGT HELPED THE COMMISSION COMMUNICATE CLEARLY.

DGT edited 49% of the Commission's **politically sensitive and important initiatives**. It organised **clear writing training events** for 2067 Commission staff and a **Clear Writing Awards ceremony** in December to reward Commission staff for drafting clearly written texts.

DGT BROUGHT LANGUAGE STAKEHOLDERS TOGETHER.

DGT continued to promote multilingualism and the translation profession by organising:
- the yearly **Translating Europe Forum**, with 2 500 participants from 100 countries
- the 16th edition of the **Juvenes Translatores** contest to reward the best young translators in the EU,
- 70 events to mark the **European Day of Languages** and
- 47 **Translating Europe workshops**.

The **European Master's in Translation (EMT) network** adopted an updated version of the EMT competence framework.

DGT FURTHER DEVELOPED ITS IT TOOLS AND DATA MANAGEMENT.

DGT rolled out the latest version of the commercial **computer-assisted translation (CAT) tool** used by its translators and the first version of the **Euramis Next Generation** platform.

The **eDGT programme**, designed to create an end-to-end platform covering and automating all steps and tasks of DGT's core business workflow, entered its planning phase.

B. Key performance indicators

All key performance indicators show that DGT performed well in 2022 and is on track to fulfil the objectives set in its strategic plan for 2020-2024.

Customer satisfaction rate:

92.8%

(Target for 2024: >80%)

Deadline compliance rate:

99.5%

(Target for 2024: 99.5%)

Use of linguistic data assets:

87.7%

(Target for 2024: >84%)

Productivity index:

131.95

(Target for 2024: >100)

See Annex 2 for further details on key performance indicators, including the baselines, interim milestones and the methodology used.

C. Key conclusions on financial management and internal control

In line with the Commission's Internal Control Framework DGT has assessed its internal control systems during the reporting year and has concluded that it is effective and the components and principles are present and functioning as intended. Please refer to annual activity report section 2.1.3 for further details.

In addition, DGT has systematically examined the available control results and indicators, as well as the observations and recommendations issued by the internal auditor and the European Court of Auditors. These elements have been assessed to determine their impact on management's assurance about the achievement of the control objectives. Please refer to section 2.1 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. The Acting Director-General, in his capacity as Authorising Officer by Delegation, has signed the Declaration of Assurance.

D. Provision of information to the Commissioner(s)

In the context of the regular meetings during the year between DGT and the Commissioner on management matters, the main elements of this report and assurance declaration have been brought to the attention of Commissioner Hahn, responsible for Budget and Human Resources.

1. KEY RESULTS AND PROGRESS TOWARDS ACHIEVING THE COMMISSION'S GENERAL OBJECTIVES AND SPECIFIC OBJECTIVES OF THE DEPARTMENT

General objective 7: A modern, high-performing and sustainable European Commission

DGT contributes to this general objective by providing **translation** and other linguistic services in the EU's 24 official languages and in others as needed and providing an **editing** service during the drafting process to make the language clear, correct and more concise.

Specific objective 7.1: Linguistic services in 24 languages support the Commission's decision-making process, policies and implementing work

In 2022, DGT **produced 2 597 000 pages**, the second highest volume ever after the peak seen in 2021 of 2 770 000 pages.

DGT recorded its second highest production ever

DGT met the sustained high demand, reflecting the intense policy work of the Commission ([2]), in particular work to respond to Russia's war of aggression against Ukraine and the energy and supply chain crises ([3]). This involved translating **voluminous packages** with **extremely tight deadlines** and **very limited predictability** because of the continuously evolving political and economic situation.

DGT put in place **special arrangements** to respond promptly to the Commission's need to **communicate in Ukrainian and Russian**. Specifically, it:

- recruited translators working into and from these languages,
- adopted exceptional and temporary workflow arrangements and
- made available in record time a Ukrainian eTranslation engine (see specific objective 2.1).

DGT addressed the sustained high workload through **sound workflow management** and high flexibility from staff, the outsourcing of a significant part of its production (**36.6%**,

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([2]) For example: the Zero pollution package; the Circular Economy II packages I and II; the Single Market Emergency Instrument; the European Chips package; and the Space package.

([3]) For example: nine urgent packages with financial sanctions; the Decision triggering the activation of the Temporary Protection Directive for those fleeing war; several urgent packages to respond to the energy crisis (e.g. the Governance Implementation package, the Energy Prices and the Energy Winter Preparedness package) and four legislative proposals on macro-financial assistance to Ukraine.

compared to 37.4 % in 2021) and targeted quality control based on risk assessment. It achieved a **deadline compliance rate of 99.5%** (+0.4% compared to 2021), in line with the target set out in DGT's strategic plan for 2020-2024, and a **customer satisfaction rate** of 92.8%, well above the target of 80% set in DGT's strategic plan for 2020-2024.

To tackle the **increased pressure on resources**, DGT designed a **set of measures to manage demand** complementing the current rules on translation management (4), to be implemented together with the Secretariat-General and other Commission departments as of 2023.

Demand for **editing** remained high (even though editing is not a compulsory stage in the drafting process). In 2022, DGT edited 29 500 pages (9% lower than in 2021). The proportion of politically sensitive and important initiatives that were edited was 49% (compared to 56% in 2021). Where politically sensitive and important initiatives were not edited, it was mainly due to the urgency or sensitivity of the file, or to documents being authentic in a language other than English.

'Clear communication is at the core of good administration. This means that we have to be clear, accountable and transparent.'

Johannes Hahn, European Commissioner for Budget and Administration

The **clear writing for Europe** campaign continued to provide all Commission staff with drafting support and resources, such as weekly clear writing tips to over 17 000 subscribers. DGT organised training sessions for 2 047 Commission staff and a full **Clear Writing Week**, culminating in the Clear Writing Awards ceremony which rewarded the best drafters in the Commission. DGT also produced a new **clear writing video tutorial** taking Commission staff through the 10 principles of clear writing and showing how to get messages across clearly, concisely and effectively.

Work on **quality management** included running an ***ex post* evaluation** of the quality of DGT's 2021 production. The results of the evaluation showed that the reference value for DGT's global quality score had increased by 2.3 percentage points compared to 2020.

The correction rate, measuring translation quality based on the number of acts adopted by the Commission to correct translation mistakes, was 0.25%, well below the tolerance level of 0.5% set in DGT's strategic plan for 2020-2024.

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(4)   Communication to the Commission 'Translation as part of the Commission's decision-making process', C (2016) 2000

Terminology work continued to focus on supporting the translation units to ensure consistency and on maintaining and feeding **IATE, the interinstitutional terminology database**. This included a large-scale clean-up and consolidation of the database. DGT also worked on embedding early terminology work in its translation workflow more efficiently and to this end, launched a pilot project in September 2022.

DGT continued to update its **service-level agreements** with other Commission departments to help anticipate demand and strengthen cooperation. The share of departments with a service-level agreement with DGT was close to 90%. DGT formalised cooperation via a service-level agreement with the newly established European Health and Emergency Preparedness and Response Authority (HERA).

DGT continued to provide **eTranslation** to meet the rising demand for machine translation in the Commission and beyond (see specific objective 2.1). It launched the **eTranslation advisory service**, a single point of contact for Commission departments designed to promote eTranslation, give guidance on its use, quality and fitness for purpose, collect and analyse feedback, and provide support on technical implementation.

On 1 January 2022, the derogation regime for translation into Irish ended, and **Irish moved to full language regime**, with the same status as the other EU official languages. DGT ran an internal competition for Irish translators to increase the ratio of permanent translation staff, which yielded 27 successful candidates. It also met the Irish authorities to ensure continued cooperation on a few joint projects that aim to develop and maintain Irish translation capacity. It collaborated with other EU translation services, including for the annual conference in Ireland to promote EU careers.

As part of its equality mainstreaming work plan for 2021–2022, DGT held the **first ever interinstitutional event on inclusive language** focusing on the challenges of legal texts, taking account of the multilingual dimension. The event brought together linguists, legal experts and diversity and inclusion professionals to compare practices on the subject.

Specific objective 7.2: DGT's state-of-the art language tools and technology enhance the efficiency and quality of translation work

In 2022, DGT's ongoing work to provide a complete, stable and well-functioning computer-assisted working environment supporting automation and collaborative working methods continued. This includes the CATE Next Generation and Euramis Next Generation projects.

CATE Next Generation is set up to enable DGT translators to move to a server-based working environment, facilitating collaboration and real-time sharing of translations into the same language and automation of preparatory work on originals. Its implementation started with the rollout of the latest version of the commercial computer-assisted translation (CAT) tool used by DGT translators (Trados Studio 2021) and with preparations to set up the server-side of that environment, including real-life testing in two departments.

DGT rolled out the first version of the **Euramis Next Generation** data platform, which then entered a stabilisation and improvement phase. Euramis Next Generation is the successor of Euramis, the central translation memory system used on a daily basis by translators. The new platform offers extended and more flexible support for the use of metadata, provides contextual information and facilitates the efficient re-use of linguistic data by translators and eTranslation engines.

The **re-usability rate** of Euramis segments rose from 42.7% in 2021 to 44.5% in 2022. The **use of linguistic data assets** [5] was 87.7%, up from 86% in 2021. The **number of segments** [6] available in Euramis was over 1,6 billion (+3.2% compared to 2021).

DGT further improved its re-use of linguistic data.

The **eDGT programme**, designed to create an end-to-end platform covering and automating all steps and tasks of DGT's core business workflow, entered its planning phase. This includes an in-depth business process analysis as well as the selection of sound technical solutions as a basis for the definition of the implementation plan (see also sections 2.2.2 and 2.2.4). Phases 1 and 2 of the core processes business analysis were completed and results presented to DGT staff. DGT also prepared the requirement management matrix of eDGT's future first module, **Trèfle Next Generation**, which handles the outsourcing workflow.

Development work on **ePoetry**, the application used by Commission departments to submit requests for language services to DGT, was finalised. DGT rolled out four new versions of the application with new and updated features. The previous Poetry interface is scheduled to be decommissioned in the first semester of 2023.

DGT continued to work on the linguistic quality of **eTranslation**. It built and released a further 231 **machine translation engines**, which well exceeds the 2024 target of 200 set in DGT's strategic plan for 2020-2024. Improvements included general text engines, which are better suited to texts that do not use EU formal language and expanding the language coverage by building an engine for Ukrainian in under 10 days.

Ukrainian was added to eTranslation in record time.

In line with DGT's ambitions to explore the use of artificial intelligence and machine learning technologies, **DGT's AI Network** [7] stepped up its activities. It tested a service detecting semantic similarities between groups of documents, which aims to optimise work organisation in the translation units. Other pilots include text summarising and the detection of unknown terminology in documents.

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[5] Defined as the degree to which linguistic data in the form of previous translations and machine translation output is used as a starting point to produce new translations.

[6] A 'segment' usually consists of a sentence or sentence-like unit (a heading, a title or an item in a list).

[7] This open, informal group of interested colleagues is a grassroots initiative that analyses and tests software solutions for possible implementation in DGT.

DGT continued to cooperate with other EU translation services on **managing shared interinstitutional tools** (eTranslation, Euramis, Quest, DocFinder and Elise) and as a partner in the IATE terminology database project. The services agreed to move forward with the Elise 2 project (ELI2E) as the new tool for communicating between drafters, translators, editors, terminologists and lawyer-linguists in the institutions involved in the ordinary legislative procedure and beyond. ELI2E could also be integrated in eDGT as a module for communication between DGT staff working at different stages in the translation workflow.

Developing advanced digital competence has become an essential part of DGT's digital transformation and efficiency drive. In 2022, DGT's network of **language technology coordinators** guided and supported progress on digital skills, language technology and tools. They accompanied DGT staff during the roll-out of Trados Studio 2021 to prepare the transition to CATE Next Generation, Euramis Next Generation and Welcome. Over the reporting period their function was reviewed in line with evolving needs, emphasising their role as digital pioneers and change agents, facilitating the introduction of new technologies, tools and IT platforms in the language departments.

Specific objective 7.3: Fluctuating demand is managed through a flexible resources mix
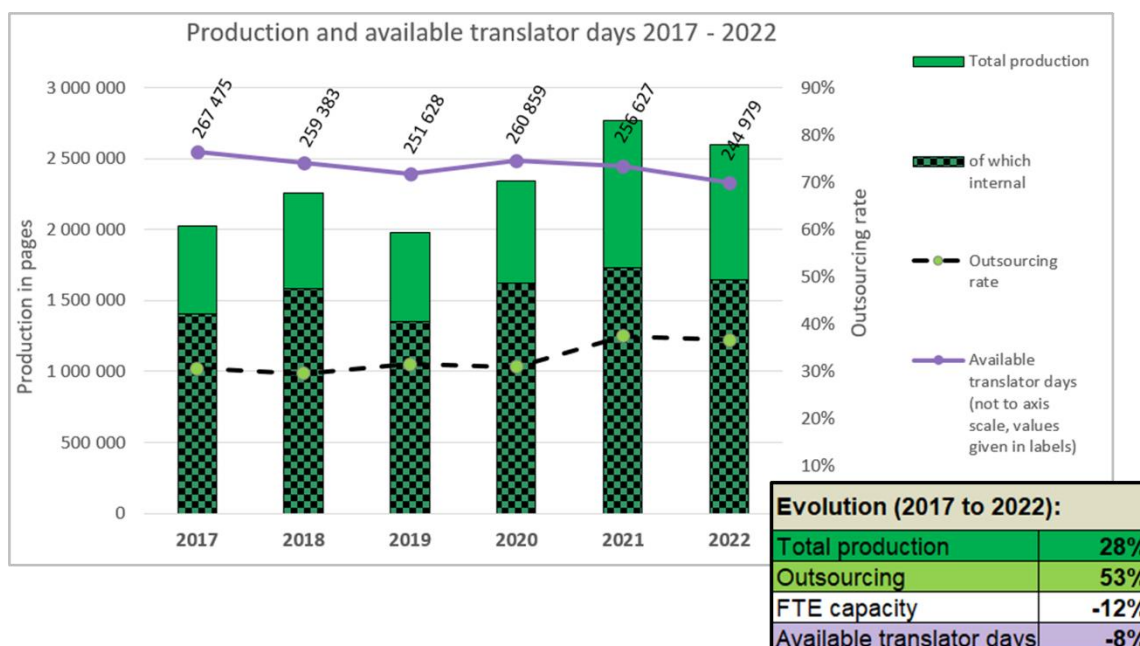

In 2022, DGT continued to manage its flexible and modular **resources mix**, consisting of **in-house staff** (officials, temporary agents and contract agents – see section 2.2.1), **outsourcing** and **language technology**, to meet the Commission's demand for translation and other language services.

In-house staff form the backbone of DGT's capacity and are key to ensuring the timely delivery of urgent, highly political and/or confidential requests. Due to capacity issues in EPSO, the temporary agent selections for translators and assistants announced for early 2022 were not launched. DGT started recruiting from the reserve lists of the temporary agent selection procedures for Danish, Finnish, German and Swedish translators and ran an internal competition for Irish translators (see specific objective 7.1).

The crucial importance of **outsourcing** in DGT's resource mix was once more confirmed in 2022, given the sustained high demand and the ongoing staff reductions. **DGT outsourced 951 000 pages**, corresponding to 36.6% of its total production. The quality of outsourced translations increased further, with **97.7% of outsourced documents marked as 'good' or 'very good'**, up from 95.6% in 2021.

The graph below shows how demand and outsourcing have evolved in relation to translator availability since 2017.

Production and available translator days 2017 - 2022

Evolution (2017 to 2022):	
Total production	28%
Outsourcing	53%
FTE capacity	-12%
Available translator days	-8%

It shows a clearly increased level of production as well as an increased outsourcing rate from 2021. At the same time, available translator days visibly decreased. In 2022, they were at the lowest level in the whole period 2017-2022.

DGT took the steps needed to prepare the **next call for tenders for the outsourcing of translation**, due to be published in early 2023 (TRAD23).

It continued to invest in cutting-edge **technology** and tools (see specific objective 7.2 for details). Tapping their potential was crucial for the translation units to alleviate the workload.

Specific objective 7.4: Multilingualism is promoted and development of the translation profession is supported

With COVID-19 pandemic-related meeting restrictions being progressively lifted, DGT's external events in 2022 included both online, hybrid and in-person events.

For the first time, the winners of the annual **Juvenes Translatores** translation contest [8] were announced in an online event in February. The awards ceremony of the 15th edition was held on 1 April in person in Brussels, after two years of being held online due to the pandemic. The 16th edition of the contest took place in November, with 2 883 students

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[8]   The contest is open to 17-year-olds in schools across the EU and aims to promote translation and the use of foreign languages. The recordings of the award ceremony are available at https://webcast.ec.europa.eu/juvenes-translatores-2021-2022-award-ceremony-2022-04-01. More information about the Juvenes Translatores contest: Juvenes Translatores (europa.eu).

from 681 EU secondary schools translating online texts on the topic of young people to mark the **European Year of Youth**.

The **European Master's in Translation (EMT) network** organised an online meeting in spring to discuss the advantages of technology for translators. A hybrid meeting was held in the autumn at Charles University, Prague, where the network adopted an updated version of the EMT competence framework ([9]), defining the basic competences that translators need to work successfully in today's market. The 2022 **eMT challenge** – DGT's contest for EMT students, focusing on mastery of the digital aspects of the translation profession – took place in April with 112 participants and focused on evaluating automated quality estimation of machine translation. The winners of the eMT challenge were announced in June, following an evaluation that also involved the **Language Industry Expert Group (LIND)**, providing industry expertise for DGT outreach projects.

They received their awards during the very successful ninth edition of the **Translating Europe Forum**, held in full hybrid mode in November, under the title 'Access for all: going beyond translating text'. The forum, which was opened by Commissioner Hahn, attracted 2 500 participants from 100 countries, of whom some 400 attended in person ([10]). DGT also held 47 **Translating Europe workshops**, mostly at national level, whose topics ranged from eTranslation, post-editing and artificial intelligence to audio-visual translation, translator training or clear writing.

DGT currently posts 27 **field officers** to work in the Commission Representations in **25 countries**. Their work included organising 70 events (in-person and online) to mark the **European Day of Languages** and to promote multilingualism, language learning and translation. The events gathered EU-wide over 125 000 participants, with an estimated overall reach of over 1 million people.

Following the lifting of restrictions on missions, DGT resumed the **Visiting Translator Scheme**. It continued its outreach work to promote the translation profession outside the language industry through the campaign **'Translation all around us' – #DiscoverTranslation**. On **social media**, the overall trend showed exponential growth on Instagram (40% increase compared to 2021), moderate growth on Twitter (11%), and slower growth on Facebook pages (6%).

([9]) The EMT competence framework is available at the following address: https://commission.europa.eu/system/files/2022-11/emt_competence_fwk_2022_en.pdf

([10]) All recordings are available on DGT's YouTube channel.

In close cooperation with SCIC, DGT continued implementing the work programme for the Commission's presidency of the **interinstitutional committees for cooperation among translation and interpretation services**. One of the highlights was an interinstitutional **middle management event** on remote working and managing in the new hybrid environment. The event, organised by DGT on the Court of Justice's premises, was attended by 140 translation managers from all EU institutions.

On **international cooperation**, DGT took the leading role in organising the International Annual Meeting on Computer-Assisted Translation and Terminology (**JIAMCATT**) in April, focusing on the transformative power of remote collaboration. DGT also took part in the International Annual Meeting on Language Arrangements, Documentation and Publications (**IAMLADP**), which included an executive-level discussion on workforce management in the post-pandemic environment.

General objective 2: A Europe fit for the digital age

Specific objective 2.1: eTranslation is used in Member States' public administrations, EU institutions and on EU platforms to overcome language barriers

In cooperation with DGs CNECT and DIGIT under the **digital Europe programme**, DGT contributed to the Commission's commitment to **digital multilingualism** by further developing its machine translation system. **eTranslation** is a prime example of artificial intelligence in the Commission, on par with the best commercial machine translation systems. It is confidential and secure by design, compliant with EU intellectual property rights and data protection rules, providing large-scale translation when human translation is not feasible. This helps the EU work multilingually and reach a broader audience. Outside the EU's institutions, eTranslation is available to Member State public administrations, university staff and students, participants in the digital Europe programme, small and medium businesses and non-governmental organisations.

'Artificial intelligence is a huge opportunity in Europe, for Europe.'

Ursula von der Leyen, President of the European Commission

Demand for eTranslation continued to grow. eTranslation was used by IT applications (e.g. the Open Data Portal) for behind-the-scenes translation in IT systems, as well as by websites and platforms to translate content into the user's language of choice. eTranslation provided automatic translation in all EU official languages for the platform supporting the **Conference on the Future of Europe**, which used the eTranslation service 1.08 million times to enable EU citizens to share their ideas on the EU's future, generating around 400 000 pages of translation. Other EU platforms using

eTranslation included the **Re-Open EU app** that keeps the EU public up to date on COVID-19 measures and the **Council Presidency** websites (French, followed by Czech in 2022).

The number of Europa websites using eTranslation increased significantly, thanks to an **eTranslation widget** which makes it easy to add eTranslation to Commission websites built using the Europa Web Publishing Platform. The widget is now used on 119 websites, while a further 88 incorporate eTranslation in a different way.

The graph below shows the trend in use of eTranslation. In 2022, the number of requests processed by eTranslation nearly doubled compared to 2021. The number of pages slightly decreased, showing that the tool is used more frequently for shorter texts (snippets).
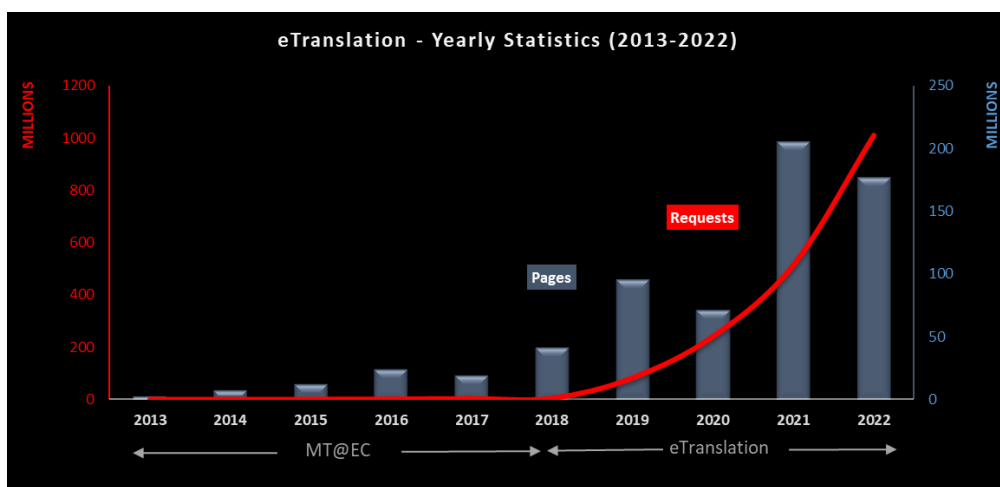
DGT successfully applied for access to supercomputing resources through the **European High Performance Computing Joint Undertaking** for a new project that will contribute to advancing machine translation technology and increasing the quality of eTranslation. It also took part with three language pairs in the **7th Conference on Machine Translation (WMT22)** to ensure its developers are up to date with the latest research in this field.

Work progressed on other language technology services and products under the digital Europe programme. The **speech-to-text service** ([11]) now accepts all media formats, whether sound or video, and covers seven languages (Dutch, English, French, German, Italian, Polish and Spanish), with customised engines based on open-source models.

([11]) The speech-to-text service, as well as other tools developed by DGT in cooperation with DG SCIC and DG DIGIT, are available via the digital Europe programme's Language Tools website.

2. MODERN AND EFFICIENT ADMINISTRATION AND INTERNAL CONTROL

2.1. Financial management and internal control

Assurance is provided on the basis of an objective examination of evidence 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 explicitly documented and reported to the Acting Director-General. The following reports/documentation have been considered:

- weekly reports on demand management and outsourcing;

- monthly budget execution reports and the quarterly management information scoreboard highlighting key data in areas in which action may be needed;

- annual reports by authorising officers by sub-delegation, including the results of internal control monitoring at DG level;

- biannual internal control reports;

- contribution by the director in charge of risk management and internal control, including the results of internal control monitoring at DG level;

- monthly reports on recorded exceptions, cases of non-compliance (including an end-of-year analysis of non-compliance events and exception requests) and any cases of 'confirmation of instructions' (Article 92.3 of the Financial Regulation);

- reports on audit results, including the latest opinion issued in DG BUDG's assessment of the accounting risk;

- limited conclusion of the internal auditor on the state of controls, and the observations and recommendations reported by the Internal Audit Service.

The systematic analysis of the available evidence provides sufficient guarantees as to the completeness and reliability of the information reported and results in the full coverage of the budget delegated to the Acting Director-General of DGT.

This section covers the control results and other relevant elements that support management's assurance. It is structured into 2.1.1 Control results, 2.1.2 Audit observations and recommendations, 2.1.3 Effectiveness of internal control systems, and resulting in 2.1.4 Conclusions on the assurance.

2.1.1. Control results

This section reports and assesses the elements identified by management which support the assurance on the achievement of the internal control objectives (ICO) [12]. DGT's assurance building and materiality criteria are outlined in annual activity report Annex 5. The annual activity report Annex 6 outlines the main risks together with the control processes to mitigate them and the indicators used to measure the performance of the relevant control systems.

Expenditure

DGT manages **administrative expenditure** only under the **direct centralised management mode**.

In 2022, DGT managed EUR 38.54 million of expenditure [13] with direct responsibility for EUR 27.74 million (the rest being appropriations for external personnel and delegated funds).

Funds co-delegated by other DGs to DGT amount to EUR 5.13 million. They mainly cover external translation costs (EUR 2.9 million committed). DG EAC co-delegated EUR 0.64 million for the organisation of external communication activities under Key Action 3 related to multilingualism [14] and DG CNECT co-delegated EUR 1.59 million (under the digital Europe work programme) for eTranslation.

DGT applies adequate internal control principles and adapts them to the low-risk environment of the DG. It applies the same level of control, irrespective of the origin of the funds managed (funds received in co-delegation, sub-delegation or own funds).

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[12] 1) Effectiveness, efficiency and economy of operations; 2) reliability of reporting; 3) safeguarding of assets and information; 4) prevention, detection, correction and follow-up of fraud and irregularities; and 5) 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 36.2). The 2nd and/or 3rd Internal Control Objective(s) (ICO) only when applicable, given the DG's activities.

[13] Amount of legal commitments made during the year, including funds sub-delegated and co-delegated by other DGs.

[14] 2022 annual work programme – Erasmus+, Commission Decision of 08/11/2021 [C(2021)7862] and amendments thereof [C(2022)1319].

| Legal commitments by procurement type	Budget (€ 000)	% of total budget	Number of transactions	% of total transactions
Type 1: **DGT FWC & NP – external translation including funds co-delegated by other DGs**	20 465	74%	24 792	93.9%
Type 2: **DIGIT FWC (IT) + other IT expenditure (incl. funds sub-delegated by CNECT)**	5 663	20%	78	0%
Type 3: **Low-value NP, AMI, FWC (from other DGs) (conferences and events, library expenditure, terminology)**	1 272	5%	334	1%
Type 4: **Missions**	337	1%	1 186	4%
Total	27 737**		26 390	

** Figures including co-delegated and sub-delegated budget received, excluding external staff
Source: DGT Budget Execution Report and internal statistics

DGT has a partially decentralised financial circuit for commitments and a fully centralised financial circuit for payments (i.e. all payments are authorised by the financial unit). The level of controls in both circuits depends on the estimated risk of the transactions, including their level of automation.

As DGT does not manage programmes and grants and has a control strategy based on comprehensive *ex ante* control, **there are no *ex post* controls**. Any errors identified are corrected before contracts are signed or payments authorised.

The table below shows all 2022 expenditure broken down by the portfolio segments managed by DGT, i.e. the administrative expenditure under the direct management mode.
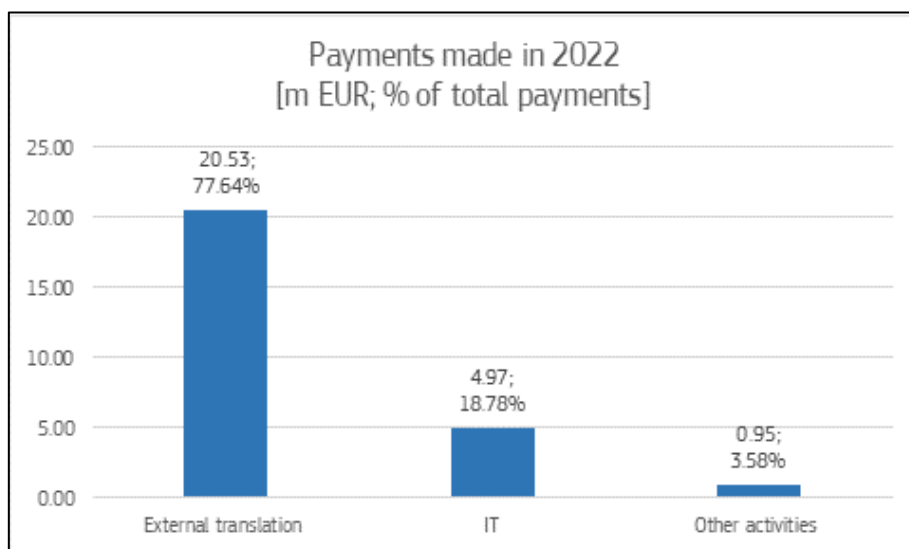
Source: DGT Budget Execution Report and internal statistics

Revenue

In terms of **revenue**, in 2022 DGT issued:

- debit notes for EUR 2.06 million to EU and partner institutions for the use of shared IT translation tools within the interinstitutional Annual Financing Agreement;

- debit notes for EUR 66 301 to other Commission departments as internal chargeback for external translation (i.e. when not covered by co-delegation);
- debit notes for EUR 48 421 stemming from performance penalties under the framework contracts linked to external translation.

The financial circuit is partially decentralised for the external translation activities, and fully centralised for the Annual Financing Agreement.

In line with the 2018 Financial Regulation (FR), DGT's assessment for the new reporting requirement is as follows:

Cases of 'confirmation of instructions'	FR Article 92.3	no cases reported
Cases of financing not linked to costs	FR Article 125.3	n/a
Financial Framework Partnerships >4 years	FR Article 130.4	n/a
Cases of flat rates >7% for indirect costs	FR Article 181.6	n/a
Cases of 'Derogations from the principle of non-retroactivity [of grants] pursuant to Art 193 FR'	FR Article 193.2	n/a

1. *Effectiveness of controls*

a) Legality and regularity of the transactions

DGT uses internal control processes to ensure sound management of risks relating to the legality and regularity of the underlying transactions it is responsible for, taking into account the multiannual character of programmes and the nature of the payments concerned.

DGT's portfolio consists of segments with a relatively low error rate, i.e. outsourced translations, IT and contracts under other procurements.

The low error rate is both thanks to the inherent risk profile of the types of expenditure managed by the department and the performance of the related control systems.

The **control objective** is to ensure that DGT has reasonable assurance that the total amount of any financial operation authorised during the reporting year not in conformity with the applicable contractual or regulatory provisions does not exceed 2% of the authorised payments of the reporting year of the control system concerned (see Annex 5 on materiality criteria).

DGT's **control strategy** is based on comprehensive *ex ante* controls, i.e. before contracts are signed or payments made. This ensures that potential irregularities are identified beforehand, which also explains the low error rate.

Comprehensive controls and verifications are in place to guarantee the legality and regularity of transactions, and these are documented in the financial circuits and checklists.

Expenditure

Management of outsourced translations (74% of DGT 2022 budget). DGT launches an open call for tenders every four years, leading to the conclusion of framework contracts with around 50 lots for selected language combinations. The latest framework contracts started on 1 July 2020. If a language combination is not covered by a lot in the framework contract or if no contractor responds to the call for tender, the contract is awarded by a very low value negotiated procedure. All procedures are documented and regularly updated.

In 2022, DGT performed *ex ante* controls, reviewing the tender documents for the open call for tender that will be launched in the first quarter of 2023.

Effectiveness indicators – procurement	
Number of framework contracts terminated in 2022	
• *For lack of use*	1
• *For poor performance of contractor*	0

Source: DGT internal statistics

For this segment, 4 non-compliances and 17 requests for exceptions were recorded, 5 fewer than in 2021 [15]. They related to procurement *procedural* errors (12 cases of negotiated procedures above the threshold of very-low value and 2 procedures above the threshold of low-value). These are not *payment* errors and therefore have no impact on the budget. Short and medium-term solutions were approved and their implementation is imminent.

Contractors submit invoices via a specific portal. All translations are quality controlled by DGT staff before the contractor is authorised to issue an invoice on the portal. The initial entry of the invoice in the Commission's accounting system is automated. Therefore, given the very low risk of the subsequent process, the financial unit reviews only a selected sample of invoices considered as a higher risk before authorising payments.

Effectiveness indicators – financial transactions	
% error rate prevented	99.5% [16]
Amount of liquidated damages (for bad quality)	€3 360
Amount of liquidated damages (for late delivery)	€2 630
Percentage of translations rated good or very good by the evaluators	97.7%

Source: DGT internal statistics

Management of IT contracts (20% of DGT 2022 budget). DGT regularly launches an open call for tender for the CATE tool (computer-aided translation). The latest call was

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[15]   Out of 17 approved exceptions for 15 language combinations, 1 was not used, so this segment concerns 14 language combinations in the end.

[16]   The error rate is set at 0.5%, a percentage based on historical levels of error rates for administrative expenditure at Commission level and used as a prudent figure by DGT.

launched and the contract was signed in 2019. The next framework contract will have to be concluded in 2027. For all other operations, DGT uses framework contracts provided by DG DIGIT. The finance unit and DG DIGIT review individual draft contracts before signature. Final contracts, timesheets and invoices are checked before the finance unit authorises payments.

For this segment, there were two non-compliance events. In both cases the legal commitment (specific contract under DIGIT framework contract) was signed before the budgetary commitment in ABAC was finalised. There was no financial impact. The AOSD was reminded of the correct procedure immediately afterwards by the internal control.

In addition, one non-compliance was registered concerning the Annual Financial Agreement, where the legal commitment was signed in January and the budgetary commitment in February, with no impact on budget.

Effectiveness indicators – financial transactions	
% error rate prevented	99.5% ([17])
Number of control failures	0
Amount of liquidated damages	0

Source: DGT internal statistics.

Management of other procurements (5% of DGT 2022 budget): mainly low- to very-low-value negotiated procedures and, to a lesser degree, calls for expression of interest and specific contracts under framework contracts of other DGs (e.g. PMO and COMM). DGT strictly applies the minimum competition requirements set in the Financial Regulation. DGT's finance unit reviews all tender documents before the contract is signed. For contracts over EUR 15 000, also DGT's lawyers review the tender documents. The finance unit checks the final contracts, delivery reports and invoices before authorising payments.

For this segment, 19 non-compliances and requests for exceptions were registered (for 16 cases, since 3 cases needed both non-compliance and exception file). Most cases involved signature of a legal commitment before budgetary commitment or after the start date of implementation of the activity. Neither the amount nor the issue were material, follow-up was carried out and mitigating measures were in place. There was no impact on the budget.

Management of mission orders and cost declarations (1% of DGT 2022 budget). In 2022, the Paymaster's Office took over the task of managing staff missions under a pilot project, while the authorising officer role remained in DGT. For this segment, the Paymaster's Office informed DGT that out of 1 186 missions carried out, there were 10 late encoding of missions, i.e. less than 1%. There was no financial impact involved.

Following a cost-benefit analysis, and given that transactions for the main share of the budget are automated, framework contracts are used intensively. Given the structure of the

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([17])   See previous footnote.

financial circuits and the results of the *ex ante* controls, **no *ex post* controls** are carried out on procurement.

Revenue

For all types of revenue, financial procedures are in place and updated. Full *ex ante* controls are carried out. No *ex post* controls are carried out, in line with DGT's control strategy.

Benefits of controls – conclusion

Strong internal controls ensure DGT's resources are used for their intended purposes, greatly minimising the risk of resource misuse. Controls prevent financial irregularities by early detection and enable timely resolution of potential issues. For more details on performance indicators, see Annex 7.

Historically, DGT's portfolio consists of segments with a low error rate (the estimated error rate has remained close to zero for years). This is both thanks to the inherent low-risk profile of DGT's expenditure (administrative expenditure, direct management) and the performance of the related control systems. The error rate is therefore usually set at 0.5% for all segments, a percentage based on historical levels of error rates for the type of expenditure managed by DGT at Commission level and used as a prudent figure by DGT.

In 2022, procedural procurement errors occurred for the segment 'external translation'. After paying close attention to this issue both in 2021 and 2022, the total number of exceptions and non-conformities fell from 26 to 21. As per the instructions, the full amount concerned by the procedural errors is considered to be at risk (no corrections made), even if there is no financial impact ([18]). So the error rate for this segment is 1.94%, down from 3.60% in 2021 thanks to mitigating measures such as close monitoring of spending levels by responsible units, leading to a general error rate at closure of 1.62%.

Based on this information, which is complete and reliable to the best of DGT's knowledge, the controls are effective and the weaknesses detected are addressed.

In addition, DGT has in place an effective mechanism for correcting errors, through *ex ante* controls, resulting in preventive measures ([19]).

([18])   For such procedural errors, the Commission does not consider that the full amount is at risk (no payment errors). However, in order to be fully transparent, and to allow stakeholders to compare the Commission's error rate with the one published by the European Court of Auditors, the full amount at risk for the 'external translation' segment is given in Table X. NB: these kinds of errors are not included in the calculation of the actual financial exposure (amount at risk) NOR considered in terms of 'quantified' materiality for a potential reservation (unless there would be room for a potential reputational reservation, which is not the case here).

([19])   Penalties/recovery orders are implemented on the external translation budget line but are not considered as correction measures, as they are linked with the monthly quality of the delivered translations.

Please see the table below for details.

	Preventive measures (m EUR)	Corrective measures (m EUR)
Implemented by the Member States		
of which from Member States controls	n/a	n/a
of which from EU controls [20]	n/a	n/a
Implemented by the Commission		
of which from Member States controls	n/a	n/a
of which from EU controls	0.013	n/a
DGT total	**0.013**	**n/a**

Based on all the above, DGT presents in the following Table X an estimation of the risk at payment and risk at closure for the expenditure managed during the reporting year:

Table X: Estimated risk at payment and at closure (amounts in EUR million)

The full detailed version of the table is provided in Annex 9.

DGT	Payments made	Relevant expenditure	Estimated risk (error rate %) at payment		Estimated future corrections and deductions		Estimated risk (error rate %) at closure	
	m EUR	*m EUR*	*m EUR*	*%*	*m EUR*	*%*	*m EUR*	*%*
Outsourcing	20.53	20.53	0.40	1.94	0.00	0.00	0.40	1.94
IT	4.97	4.97	0.02	0.50	0.00	0.00	0.02	0.50
Other	0.95	0.95	0.00	0.50	0.00	0.00	0.00	0.50
DGT total	**26.45 m EUR**	**26.45m EUR**	**0.43 m EUR**	**1.62%**	**0.00m EUR**	**0.0%**	**0.43m EUR**	**1.62%**

The <u>estimated overall risk at payment</u> for 2022 expenditure is the AOD's best conservative estimate of the amount of relevant expenditure during the year, not in conformity with the

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[20] For such *procedural* errors, the Commission does not consider that the full amount is at risk (no *payment* errors). However, in order to be fully transparent and to allow stakeholders to compare the Commission's error rate with the one published by the European Court of Auditors, the full amount at risk for the 'external translation' segment is provided in Table X. NB: these kinds of errors are not included in the calculation of the actual financial exposure (amount at risk) NOR considered in terms of 'quantified' materiality for a potential reservation (unless there would be room for a potential reputational reservation, which is not the case here).

contractual and regulatory provisions applicable <u>at the time the payment was made.</u> There are no *ex post* controls ([21]).

The <u>estimated overall risk at closure</u> of EUR 0.43 million, representing 1.62% of DGT's total expenditure for 2022, decreased by 1.18% compared to 2021 mainly due to a significant reduction in the value of procedures under procurement error.

For an overview at Commission level, the departments' estimated overall risk at payment, estimated future corrections and risk at closure are consolidated in the AMPR.

b) Fraud prevention, detection and correction

DGT has developed and implemented its own anti-fraud strategy since 2014, based on the methodology provided by OLAF. In December 2020, following a comprehensive risk and fraud assessment and based on DGT's strategic plan for 2020-2024, DGT updated its anti-fraud strategy. The next revision will take place with the next strategic plan in 2024, in line with the low risk of DGT and its mature business processes. Fraud risks are nevertheless re-assessed each year in the context of the management plan. In line with the Commission's new anti-fraud strategy, fraud prevention and detection aspects are emphasised in all risk assessments performed.

Implementation of the action plan is monitored and reported to management twice a year. All actions were implemented. Details are available in Annex 7.

DGT also contributed to the Commission anti-fraud strategy. It did not receive any OLAF's financial recommendations.

The results achieved during the year thanks to the anti-fraud measures in place can be summarised as follows: no leaks or misuse of sensitive information nor fraud cases were reported in 2022. There were no pending investigations opened by OLAF from previous years, no open financial recommendations by OLAF, and no potential fraud related case reported to or by either OLAF or IDOC in 2022.

On the basis of the available information, DGT has reasonable assurance that the anti-fraud measures in place are effective.

c) Other control objectives: safeguarding of assets and information, reliability of reporting (if applicable)

Not applicable ([22]).

([21]) Penalties/recovery orders are implemented under external translation budget line, however are not considered as correction measures, forasmuch as they are linked with the monthly quality of the delivered translations.

2. *Efficiency of controls*

The time-to-pay indicator (Article 116.1 of the Financial Regulation) for 2022 is 99.3% of payments made within the deadline (number of payments) and 99.4% (amount paid). The relevant number of payment requests implemented in 2022 was 5 493, out of which there were 37 late payments (0.67%) in the overall amount of EUR 144 146.6 (0.55%).

Timely payments (amount)

Timely Payments	DGT Score	EC Score
(chart: EC (98%) / 99%)	**99%**	**98%**
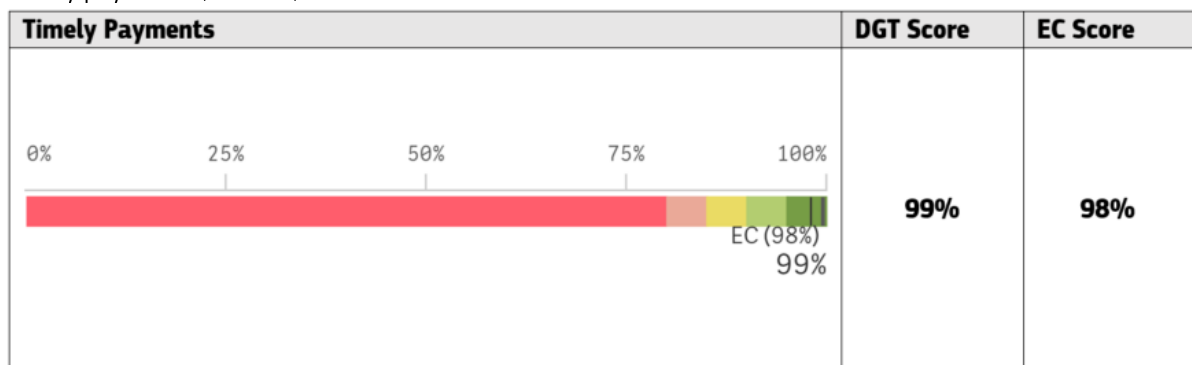
(Source: Financial Dashboard – Annex 4)

	2020	2021	2022
Time-to-pay			
Number of payments within time limit	98.6%	95.5%	99.3%
Amount paid within time limit	n/a	97.0%	99.4%
Average payment times			
Average net/gross payment time*	7.9/9.0 days	8.8/9.7 days	8.3/8.6 days

Source: SAP
*Net is without suspension delays/gross includes suspension delays

DGT has a fully centralised financial circuit for payments and handles a high volume of very low-value transactions. . Some controls are automated (e.g. payments on the external translation budget line). Reports monitoring the invoice workflow are extracted twice a week from the Commission's finance database, enabling DGT to react rapidly in the event of any delays in the payment workflow. DGT maintained an excellent efficiency in average payment time – see Annex 4 and table above.

In 2022, DGT continued to use qualified electronic signature (QES) where possible, thus shortening its commitment workflow. Whenever contractors do not have QES certificates, DGT uses a 'hybrid' workflow for commitments, where the contractor signs in 'blue ink', and the Commission uses QES.

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(22) DGT-managed assets (other than IT intangible assets) are dictionaries or encyclopaedias when their cost exceeds the applicable thresholds. This is only a very small share of DGT's library acquisitions. Orders are made based on end-user requests (in line with the purchasing policy established by the DG) and delivered to the library. The invoices are processed by the acquisition sector in DGT's finance unit.

Other efficiency indicators (including the percentage of cost over annual budget) are available in Annex 10.

Based on the good results obtained, DGT concludes positively on the efficiency of the controls.

3. Economy of controls

The estimated cost of controls concerns the management of outsourced translation and IT budget lines (i.e. 94% of DGT's commitment appropriations). It is independent from the type of funds used (co-delegated or own funds), as the controls are identical.

DGT applies the Commission-wide methodology for estimating, assessing and reporting on the cost-effectiveness of controls ([23]).

For **outsourced translation**, controls account for 5.60% (down from 6.45% in 2021) i.e. EUR 1.15 million. This stems from the very high number of transactions (24 792). Although procurement rules are simplified to the maximum for low and very-low-value transactions, a minimum number of controls have to be carried out for each transaction, regardless of the amount, in order to comply with the Financial Regulation. There were no changes in the control strategy compared to 2021, the lowest percentage is due to more efficiently performed controls with approximately the same amount of transactions.

The controls carried out encompass:

  i)   the legality and regularity of the transactions;

  ii) operational agent verifications before documents to be translated are sent to the contractors (correct alignments, format of translation memories, reference documents, page counting, etc.);

  iii) cost of development and maintenance of the in-house IT system that processes the bulk of financial transactions. Without this tool, it would be impossible to manage the 24 792 transactions at reasonable cost and within acceptable deadlines. For example, in 2022 over 4 957 invoices received were automatically registered in the Commission's accounting system. The number of controls integrated in the IT tool enabled better targeted financial verification and payment generation.

For the **management of the IT budget**, the overall cost of control in DGT is estimated at 1.6% (the same as in 2021) i.e. EUR 0.08 million, including legality and regularity checks. DGT's extensive use of DG DIGIT framework contracts lowers its procurement costs.

([23]) As from 2021 the costs are calculated against the total amount of payments, whereas in previous years they were calculated against the total amount of legal commitments.

The **total cost of control** for DGT in 2022 is estimated at 4.8% (down from 5.5 % in 2021) i.e. EUR 1.23 million. See Table Y in Annex 7 for details.

4. *Conclusion on the cost-effectiveness of controls*

Based on the most relevant key indicators and control results, DGT has assessed the effectiveness, efficiency and economy of its control system and reached a positive conclusion on the cost-effectiveness of the controls for which it is responsible.

As explained in previous sections, DGT manages a very high number of low and very-low-value transactions (24 792 alone for external translation budget line) in relation to the size of its legally committed budget (EUR 27.74 million for all budget lines). Although the procurement rules are simplified for low and very-low-value procurement procedures, a standardised number of controls must be carried out for each transaction to comply with the Financial Regulation. Where possible (mainly for IT), DGT uses framework contracts from other DGs. For the management of the external translation budget, most financial transactions are automated via an IT system developed and maintained in-house.

DGT's financial activities and subsequently DGT's control environment and control strategy have remained stable for years. The indicators for DGT constantly confirm low error rates and fast payments, the legality and regularity of procedures, and all goods and services procured meet the needs they are designed to cover. No new financial or control issues were identified in 2022.

2.1.2. Audit observations and recommendations

This section sets out the observations, opinions and conclusions reported by auditors – including the limited conclusion of the Internal Auditor on the state of internal control. Summaries of the management measures taken in response to the audit recommendations are also included, together with an assessment of the likely material impact of the findings on the achievement of the internal control objectives, and therefore on management's assurance.

There were no pending IAS recommendations in 2022. In the second half of the year, a new multi-DG performance audit started on categorisation of information and protection of confidential information, with the objective to assess the design and implementation of the Commission's control framework for protecting confidential information.

DG BUDG carried out in 2019 an in-depth analysis on the validation of local systems in DGT. DGT implemented all recommendations. As a consequence, the accounting risk as assessed by DG BUDG in 2021 (referring to year 2020) fell from 'medium' to 'low'. No assessment was performed by DG BUDG in 2022.

Based on the work carried out by the IAS in the period 2018-2022 in DGT and taking into account the actions taken by DGT management, **the IAS concluded that the internal control systems in place for the audited processes are effective**.

As a result of implementing the recommendations made in the auditors' observations in previous years and in the absence of ECA remarks on the discharge procedure, DGT management can give a **positive conclusion** on the assurance provided by its internal control system.

2.1.3. Assessment of the effectiveness of internal control systems

The Commission has adopted an Internal Control Framework based on international good practice, to ensure the achievement of its policy and management objectives. Compliance with the internal control framework is a compulsory requirement.

DGT uses the organisational structure and the internal control systems suited to achieving its policy and internal control objectives in accordance with the internal control principles and has due regard to the risks associated with the environment in which it operates.

DGT assessed the effectiveness of its internal control systems in line with the methodology established in the Commission's Implementation Guide to the Internal Control Framework. The sources to assess the strengths and deficiencies of the internal control systems are:

i) the year-end assessment of the internal control monitoring criteria, including baseline and target values, established in DGT's 2022 Management Plan (see Annexes 2 and 7);

ii) management assessment of daily operations and results of key controls;

iii) results of corporate indicators reported in Annex 4;

iv) follow-up to staff surveys and customer survey;

v) analysis of the register of non-compliances and exceptions;

vi) ongoing monitoring of the anti-fraud strategy;

vii) regular risk assessments, as per DGT guidelines on risk management;

viii) relevant audit results.

A working group made of representatives of all directorates assessed the above sources on the basis of DG BUDG guidelines and templates. Attention was drawn to any potential cross-principle weaknesses. The conclusions, given below, were approved by the director in charge of risk management and internal control and by the Acting Director-General.

DGT has assessed its **internal control system** during the reporting year and has concluded that it is **effective** and the **components and principles are present and functioning as intended**.

The follow-up of last year's assessment is reported in Annex 8.

2.1.4. Conclusions on the assurance

This section summarises the assessment of the elements reported above (in sections 2.1.1, 2.1.2 and 2.1.3), and the sub-conclusions. It draws an overall conclusion to support the declaration of assurance and whether it should be qualified with reservations.

DGT only manages direct centralised expenditure (low inherent risk) and has consistently had a close to zero error rate for years [24]. For 2022, DGT was positively assessed with regard to 9 out of 10 standard financial indicators at corporate level [25] (see Annex 4).

Processes, systems and workflows for all sectors of DGT activity are documented and updated on a regular basis, including the special measures for the pandemic put in place until mid-2022. A mid-term review of DGT's management plan summarizes DGT's mid-year progress towards achieving the Commission's and DGT's policy objectives. Financial objectives are covered in the reports submitted by the authorising officers by sub-delegation once a year to the authorising officer by delegation. In addition, a high level of assurance regarding internal control is ensured by biannual internal control reports addressed to the Acting Director-General.

Implementation of DGT's anti-fraud strategy action plan is monitored twice a year, and the risk register is reviewed at least once a year. Risks are appropriately managed and mitigating actions are put in place where needed.

All elements reported in section 2.1.1. allowed senior management to conclude positively on the effectiveness, efficiency and economy of controls in place in DGT.

Section 2.1.2 reports the results of management and auditor monitoring. A systematic analysis of the evidence available provides sufficient guarantees as to the completeness and reliability of the information reported and results in a comprehensive coverage of the budget delegated to the Acting Director-General of DGT.

No weaknesses justifying a reservation were identified in the reporting period.

DGT management has assessed that the internal control system is functioning as intended (section 2.1.3).

DGT does not entrust funds nor budget implementation tasks to the Translation Centre for the Bodies of the European Union. The Centre's management board, chaired by the Acting Director-General of DGT, will assess the Centre's 2022 annual consolidated activity report by mid-June 2023.

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[24] An exceptionally higher error rate for one segment of its budget (outsourced translation) of 3.6% in 2021 fell in 2022 again to 1.94%. Short and medium-term solutions are under imminent implementation.

[25] Payment forecast implementation is just below the 80% target, at 79%.

In conclusion, based on the elements reported above, 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 Acting Director-General, in his capacity as Authorising Officer by Delegation has signed the Declaration of Assurance.

2.1.5. Declaration of Assurance

Declaration of Assurance

I, the undersigned,

Acting Director-General of the Directorate-General for Translation

In my capacity as authorising officer by delegation

Declare that the information contained in this report gives a true and fair view ([26]).

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 Service 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, 31 March 2023

(e-signed)

Christos ELLINIDES

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[26] True and fair in this context means a reliable, complete and correct view on the state of affairs in the DG.

2.2. Modern and efficient administration – other aspects

2.2.1. Human resource management

DGT continued to use its resources in a flexible way (see specific objective 7.3). It started recruiting from the reserve lists of the **temporary agent selections** for Danish, Finnish, German and Swedish translators and ran an internal competition for Irish translators (see specific objective 7.1). It hosted 98 Blue Book trainees and offered 30 training placements in departments, horizontal units and field offices.

Recruitment to management positions continued in line with the College's instructions on gender equality. By end 2022, DGT had made **11 first-time appointments of women in management** [27]. With 63.9%, DGT already has a **high share of women in middle management positions**.

> 63.9% of DGT's managers are women.

DGT continued to implement its **equality mainstreaming work plan for 2021–2022**. On top of organising the **first ever interinstitutional event on inclusive language** focusing on legal acts (see specific objective 7.1), DGT implemented the internal dimension of this plan by raising awareness about the benefits of diversity and inclusion, promoting access to learning resources on equality-related topics (e.g. unconscious bias) through its Sophia newsletter, and fostering a culture of inclusion and belonging at the workplace.

DGT smoothly implemented the Commission decision on working time and hybrid working, building on its two years' experience with remote and hybrid working and on its extensive experience with teleworking before the pandemic. It continued to provide supportive working conditions and carried out targeted communication measures to foster **staff engagement and well-being**, including through online and in-person meetings between senior management, staff and trainees. On DGT's intranet, the focus was on communicating on issues close to the heart of staff, such as news regarding DGT's **future premises** in Brussels and Luxembourg, follow-up to the HR staff survey and efforts to manage the increasing workload. Work to increase **DGT's visibility in the Commission** continued with regular articles published on the Commission-wide intranet, My IntraComm.

DGT analysed the results of the **Commission's 2021 staff survey**, consulted its staff via focus groups and at an online staff forum, and adopted a list of actions to address the key areas of concern: demand; staffing and workload; working together across all levels of DGT and working environment and wellbeing.

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[27] The target of 16 by 2022 was not reached because not all the positions which had become vacant were published.

The actions are integrated in **DGT's HR strategic framework,** adopted in the autumn, complementing the Commission's HR strategy and focusing on three pillars, as shown in the picture below:

In line with its 2022 training plan, **DGT's learning and development offer** focused on thematic training, digital skills, organisational and management development. Team-building events resumed after a long break due to COVID-19 pandemic, with positive effects on team spirit and collaboration. DGT also organised 78 knowledge-sharing events with a total of 5 100 participants. Due to COVID-19 pandemic-related restrictions in the first part of 2022, DGT's **pilot project on upskilling translators** in computational linguistics could not be completed. Preparations are underway to implement the final stages of the project.

See Annex 10 for more information on human resource management.

2.2.2. Digital transformation and information management

Digital transformation

DGT continued to implement its digital master plan for 2021–2024. It made progress on its key **digital transformation projects** – its multiannual flagship eDGT programme, eTranslation, CATE Next Generation, Euramis Next Generation and ePoetry (see also specific objectives 7.2 and 2.1), in full alignment with the objectives of the Commission's digital strategy. DGT's activities in the four areas of the plan (technology, data, people and processes) contributed to the objectives of fostering a digital culture, empowering business-driven digital transformation and ensuring a seamless digital landscape. When launching new initiatives, DGT applies the digital principles and follows corporate guidance, e.g. the dual pillar approach, when selecting technical solutions.

Regarding the **eDGT programme**, DGT started its planning phase (see specific objective 7.2 and section 2.2.4). This involved carrying out a business analysis of DGT's core business areas to identify new or better ways of working and map potential future core business and related processes that the platform will support. It also carried out an analysis of the translation management systems and products available on the market and the corporate

IT tools and components relevant to the eDGT target architecture. As a cornerstone of DGT´s digital modernisation, eDGT will develop a **streamlined technical platform** replacing the fragmented landscape of legacy software. It will be based on components supported by DIGIT and facilitate integration of DGT operations with other corporate systems.

Lastly, DGT started migrating to the Commission's new digital environment, Welcome, making changes to some of its workflow applications needed to integrate with Welcome.

Information management

In line with the Commission-wide framework on data governance and data policies, DGT's IT and Data Steering Committee ensured a comprehensive and coherent application of **data governance** principles to DGT's IT systems and data assets. DGT started implementing its **data action plan 2022-2023**, translating the objectives of its data strategy into concrete actions based on use cases for language and operational data. DGT's Data Coordination Board reviews and updates the plan twice a year.

DGT adopted its **knowledge management plan for 2022-2023**, setting out actions to capture and share knowledge and to facilitate information retrieval and delivery in the new working environment. In this context, DGT created a **network of M365 local champions** to form a community of practice to make the best possible use of M365 and support the transformation of key work processes. DGT joined the [EU academy](#) to better share knowledge internally and externally. In addition to streamlining mentoring and induction practices, DGT introduced a **job-shadowing scheme** as a tool for knowledge transfer. Work started on transforming DGT's library into a fully-fledged knowledge and information service offering online resources, text analysis tools and terminological datasets.

Digital skills are essential for DGT staff to keep pace with digital and technological change in the working environment and the translation profession. In 2022, 315 training sessions were organised in DGT, focusing on the use of computer-assisted translation tools and workflow tools within language departments and horizontal units.
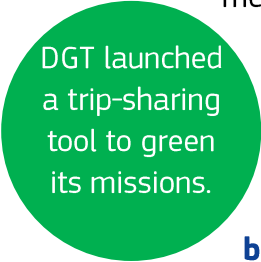
Data protection

DGT's operational controllers and record editors made sure DGT met its data protection obligations. DGT's Data Protection Coordinator managed the inventory of DGT data processing operations in the Commission's Data Protection Records Management System, keeping the inventory up to date and complete. Two information sessions on data protection were held for the AST Network and all DGT staff. The Coordinator held ad hoc meetings with controllers and record editors on updating the Data Protection Records Management System, and **awareness-raising sessions** with units/departments/field officers to clarify specific aspects of data protection relevant to their fields of interest.

Being highly dependent on IT, DGT continued to invest in raising staff awareness on **cyber security**, including by setting up a cybersecurity network with representatives from all directorates. Five DGT staff took part in the corporate Cybersecurity Training Programme to become cyber ambassadors and contribute to updating DGT's IT security plans.

2.2.3. Sound environmental management

DGT continued to be at the forefront of sound environmental management in the Commission, making further progress in the priority areas outlined in its Eco-Management and Audit Scheme (EMAS) action plan for 2020-2022. It published monthly GreenDGTtips in an online newsletter, which now includes a permanent section on digital waste management. It organised regular EMAS training sessions and workshops, including on sustainable living in Luxembourg. It ran **spring and autumn cleaning trails** and carried out a number of centrally coordinated actions. In the summer, DGT joined the Commission's effort to **reduce energy consumption** and closed one building in Luxembourg and one in Brussels for a total of eight weeks as part of the Greening the Commission action plan. All DGT buildings were also closed over the Christmas period.

DGT continued striving to eliminate single-use items from its buildings and to promote **paperless workflows** in all directorates. This included reducing printed materials in meetings and colour printing for promotional materials, not distributing printed flyers but announcing events via screens and posters in canteens or entrance lobbies, and refraining from printing for work/task distribution. DGT also ran a six-month pilot portal, where staff can either offer or seek a ride to commute between Brussels and Luxembourg, with the aim of **reducing the carbon footprint of its business travels**.

DGT launched a trip-sharing tool to green its missions.

DGT was one of the winners of the **3ʳᵈ corporate competition on sustainable conferences and events**. It was the only Commission department that submitted well substantiated applications in all categories of the competition.

2.2.4. Example(s) of initiatives to improve the economy and efficiency of financial and non-financial activities.

As part of the preparatory stage of the **eDGT programme** (see also specific objective 7.2 and section 2.2.2), DGT started a business process analysis of its core processes to identify elements that could be simplified, streamlined, harmonised, automated or improved. eDGT will reduce the complexity of the current workflow applications landscape, increase its overall stability and **reduce administrative overheads** per accepted translation request, thus **increasing DGT's overall efficiency**.

DGT continued to invest in **eTranslation** and to provide this service to other EU institutions and bodies for an annual fee, generating economies of scale by avoiding costly local development or procurement. As a component of both the Commission's reusable solutions

platform and the digital Europe programme, eTranslation is designed to process high and growing volumes. Being an in-house solution designed to meet all machine translation needs without depending on third-party technology, eTranslation helps streamline IT solutions and protect EU intellectual property rights and data ownership. In close cooperation with DGs COMM and DIGIT, through eTranslation DGT expanded the language coverage on Europa and other EU platforms with a 'fit-for-purpose' quality and at minimum marginal costs for the EU budget (see specific objective 2.1).

DGT also achieved further efficiencies by transferring mission management to the Paymaster's Office under a pilot project running until the end of 2022.

Lastly, DGT **further automated its outsourcing workflow**. It currently automates around 68.5% of its outsourcing requests, up from 65% in 2021. The automatically created packages contain the text to be translated, all available linguistic resources and other information external contractors need to work efficiently. This approach reduces the workload on language departments and the external translation unit, generates savings on the outsourcing budget and improves the quality of outsourced translations.