

## Annual Activity Report 2023

DG TRANSLATION

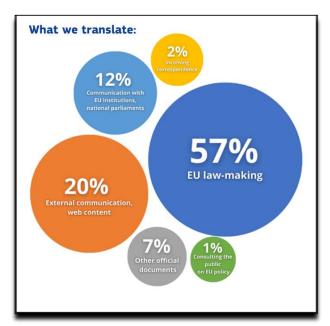
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#### **DG TRANSLATION IN BRIEF**

DG Translation (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.

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, linguistic advice, and machine translation. These activities are mostly demand-driven and supported by quality management, terminology work, outsourcing and administrative functions.



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 to make the EU more open, accountable and democratic. DGT's 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 partner in the legislative and communication processes, and the hub for all translation-related activities in the Commission. It also endeavours to be a reference in the world of translation and to contribute to the modernisation of the translation profession.

In collaboration with the Directorate-General for Communications Networks, Content and Technology (DG CNECT) and the Directorate-General for Digital Services (DG DIGIT) under the Digital Europe programme, DGT also helps support **digital multilingualism** by providing secure and reliable **language services powered by artificial intelligence** (AI). Building on its experience in developing its in-house neural machine translation system, **eTranslation**, over the years DGT has expanded the portfolio of such services, which are made available to the EU institutions and to public administrations, universities, small and medium-sized enterprises, non-governmental organisations and Digital Europe projects throughout the EU.

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#### **EXECUTIVE SUMMARY**

This annual activity report is a management report of the Director-General of Translation 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).

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<sup>(1)</sup> 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 quality translation service in the EU's 24 official languages and in others as needed and an editing service as part of the drafting process, to make the language clear, correct and concise. In 2023, DGT continued to enable the Commission to take swift action on its headline ambitions and deliver on politically urgent and important packages which were often challenging in terms of volume and deadlines. These files ranged from health, economy, finance, environment, climate, cybersecurity, customs, defence and trade policy areas, to action taken in response to Russia's war of aggression against Ukraine.

DGT also contributes to the general objective of making 'Europe fit for the digital age' by providing secure and reliable AI-powered language services, including its neural machine translation system, eTranslation. In 2023, DGT gained access to the MeluXina supercomputer to further advance machine translation technology and eTranslation quality. In recognition of its role in pioneering AI applications, DGT was mandated by the Commission's IT governance to lead the AI@EC Network, a community focusing on concrete use cases of AI. DGT launched eSummary, a multilingual summarisation tool, and developed new AI projects such as eBriefing, using AI to generate first drafts of briefings.

#### Challenges given the context

DGT faced **sustained high demand** and **extremely tight deadlines** for a number of files that the Commission was under strong political pressure to deliver earlier than agreed to enable the co-legislators to finalise them ahead of the **2024 European elections**. This intense workload was compounded by the very difficult context of decreasing staffing due to DGT's significant contribution to the Commission's redeployment efforts, ongoing since 2012.

To tackle this pressure, DGT continued to take action to **manage translation demand** on all fronts, in cooperation with the Secretariat-General and other Commission departments, while remaining fully committed to delivering **fit-for-purpose translations**. It continued to apply **sound workflow management** to prioritise tasks, focusing in-house resources on the most sensitive, difficult, or urgent files. It **outsourced a significant volume of pages**, applied targeted quality control based on risk assessment and used the full potential of its suite of translation and quality assurance tools. DGT staff responded to unpredictable, urgent, and highly demanding requests with flexibility and team spirit. This demonstrates once again the value for the Commission of having highly skilled in-house staff, alongside a reliable and professionally qualified pool of external contractors.

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#### Highlights for 2023

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

DGT produced **2 553 813** pages, meeting sustained high demand and extremely tight deadlines. On top of translating highprofile documents in the health, economy, finance, environment, climate, cybersecurity, customs, defence and trade policy areas, DGT continued to respond swiftly to the additional work related to Russia's war of aggression against Ukraine.

It outsourced **39.5% of its production**, amounting to **1 009 746 pages**.

DGT launched and promoted a new call for tenders for the outsourcing of translation (TRAD23) and finalised the evaluation of the tenders.

DGT LED AI EXPLORATIONS IN THE COMMISSION AND DEVELOPED NEW AI-POWERED LANGUAGE SERVICES.

DGT was tasked with organising Al explorations across the Commission by leading the Al@EC network, with over 2 500 members. It launched eSummary, a multilingual automated summarisation tool, as a full Commission service and as part of the eTranslation family of tools, and developed new prototypes, such as eBriefing, using Al to generate first drafts of briefings.

DGT FURTHER CAPITALISED ON ITS DATA MANAGEMENT AND DEVELOPED ITS IT TOOLS.

DGT rolled out the second release of its Computer Assisted Translation Environment Next Generation (CATE NG), and progressed with the eDGT programme, focusing on the core business process review and the definition of eDGT's technical architecture.

ETRANSLATION GOT A BOOST FROM THE MELUXINA SUPERCOMPUTER.

**eTranslation** continued to be an important enabler of the EU's **digital multilingualism**. Demand remained steady high, with a constant flow of requests, 196 million pages treated and an increased number of active systems connected.

DGT gained a six-month access to the **MeluXina supercomputer in Luxembourg** to advance machine translation technology and further increase eTranslation quality.

DGT HELPED THE COMMISSION COMMUNICATE CLEARLY.

DGT edited 66% of the Commission's politically sensitive and important initiatives and organised 46 clear writing training events for Commission staff. It also organised the third high-level 'Clear Writing for Europe' conference, which focused on supporting EU democracy and transparency through clear language.

**DGT** BROUGHT LANGUAGE STAKEHOLDERS TOGETHER.

DGT launched the new call for membership of the **European Master's in Translation network** for 2024-2029.

It joined the initiatives to mark the **European Year of Skills** and continued to promote multilingualism and the translation profession by organising:

- the yearly Translating Europe Forum,
- the 17th edition of the Juvenes
   Translatores contest.
- 73 events to celebrate the European Day of Languages and
- 44 Translating Europe workshops.

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#### **B.** Key performance indicators

All key performance indicators show that DGT performed well in 2023 and is well on track to fulfil the objectives set in its strategic plan for 2020-2024.





Customer satisfaction rate: Deadline compliance rate:

92.3%

(Target for 2024: >80%)

99.7%

(Target for 2024: 99.5%)





Use of linguistic data assets:

92.1%

(Target for 2024: >84%)

**Productivity index:** 

127.5

(Target for 2024: >100)

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

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## C. Key conclusions on internal control and financial management

In line with the Commission's Internal Control Framework 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. Please refer to annual activity report Section 2.3 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 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 Director-General, in his capacity as Authorising Officer by Delegation, has signed the Declaration of Assurance.

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#### **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 Administration.

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# 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 other languages as needed and by providing an **editing** service during the drafting process to make the language clear, correct and concise.

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

In 2023, DGT produced 2 553 813 pages.

With the legislative term entering a crucial stage **ahead of the 2024 European elections**, the Commission committed to deliver at an increasing speed on the outstanding political initiatives. This led to a significant accumulation of **politically urgent, important and high-volume packages** (²), together with several highly technical and voluminous packages in the economic and financial area (³) and a number of trade agreements (4).

DGT produced 2 553 813 pages.

As a result, DGT faced **sustained high demand** and **extremely tight deadlines**, combined with **unstable texts** and **successive document versions**. Despite the numerous concurring priorities and the very difficult context of ever decreasing staffing, DGT continued to deliver translations in the shortest timeframe possible, and achieved a **deadline compliance rate of 99.7%** and a **customer satisfaction rate of 92.3%**, both exceeding the targets set in DGT's strategic plan for 2020-2024 (99.5% and 80% respectively).

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<sup>(2)</sup> For example: the Net Zero Industry Act, the European Critical Raw Materials Act, the Pharma package, the Banking Union package, the Recovery and Resilience Facility package, the Zero Pollution package, the Circular Economy II package, and the Customs Reform package.

<sup>(3)</sup> For example: the Single Currency package, the Sustainable Finance package, and the Open Finance and Payments package.

<sup>(4)</sup> With Chile, Kenya, Mexico and New Zealand.

DGT continued to apply special arrangements to respond swiftly to the additional work related to **Russia's war of aggression against Ukraine** (5) and reinforced its internal capacity for translation into Ukrainian.

DGT addressed the intense workload, accumulation of large high-priority files and tight deadlines through sound workflow management, **high flexibility and dedication from staff**, the outsourcing of a significant part of its production (39.5%), and targeted quality control based on risk assessment.

To tackle the increased pressure on resources, DGT continued to implement a set of measures to **manage translation demand** and to improve **corporate discipline**. For instance, DGT worked with other Commission departments and the Secretariat-General on the strict implementation of the rules on page limits according to the type of documents, limiting the number of languages for the translation of specific types of decisions, discontinuing the translation of certain types of documents, and, where appropriate, encouraging the use of eTranslation. It continued to raise awareness on the effects of versioning on DGT's production and efficiency and to implement its **service-level agreements** with other Commission departments to help anticipate demand and strengthen cooperation. Currently, about **90%** of Commission departments have a service-level agreement with DGT.



DGT continued to provide **eTranslation** as a service to meet the demand for machine translation in the Commission and beyond (see specific objective 2.1) and to promote it to Commission departments through the **eTranslation advisory service**. The Directorate-General for Communication (DG COMM) and the Spokesperson's Service launched a pilot

project in cooperation with DGT with the aim of using eTranslation to increase the accessibility of **multilingual press content** for a number of policy areas in real time, when no human translation is yet available. The Spokesperson's Service decided to continue the pilot project in 2024 by expanding its scope to include more policy areas. In response to requests expressed in DGT's Customer Pulse Survey of 2022, the eTranslation service now allows **automatic language recognition** after 30 characters.

In 2023, DGT edited 34 040 pages. The share of politically sensitive and important initiatives that were edited was 66% (up from 49% in 2022). 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.

DGT continued to run the **Clear Writing for Europe initiative**, providing colleagues across the Commission with drafting support and other resources, such as weekly clear writing tips that reach over 18 500 subscribers. Delivering high quality training on clear

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<sup>(5)</sup> For example, the 10th, 11th and 12th sanction packages. For more information, see <u>Sanctions adopted following Russia's military aggression against Ukraine</u>.

writing remained a priority, with 46 training sessions delivered to 1773 Commission staff and to 774 staff from other EU institutions and bodies.



'Clear language is cornerstone to a strong European democracy.'

Johannes Hahn, European Commissioner for Budget and Administration

In 2023, DGT revised and updated its **reference model for quality management** to take account of developments such as the ongoing demand management measures and the features of the upcoming framework contracts for the outsourcing of translations (TRAD23). It also completed an ex post evaluation of the quality of its 2022 production: the results show that the quality of DGT translations lies in the interval of 86.95%  $\pm$  2.32%, confirming that DGT's quality management system is robust and works as intended.

The correction rate, which measures translation quality based on the number of acts adopted by the Commission to correct translation mistakes, was 0.23%, well below the tolerance level of 0.5% set in DGT's strategic plan for 2020-2024.



**Terminology work** continued to focus on supporting the translation units to ensure that terminology is consistent and correct. Targeted training sessions were provided on key topics, including on how to write

definitions and create good entries in **IATE, the interinstitutional terminology database**. DGT concluded the pilot project on embedding **early terminology work** in its translation workflow. Results showed that centralised early terminology extraction and the preparation of term bases by terminologists provide translators with an optimal access to terminology during the translation process. DGT also continued with its large-scale clean-up of Commission-owned data in IATE with the aim to improve the quality and usability of the database.

Finally, in its role as partner DG, DGT started preparing the **first evaluation of the Translation Centre for the Bodies of the European Union**, in line with the requirements of the Common Approach on decentralised agencies and the Better Regulation guidelines.

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

DGT continued its work to provide a complete, stable and well-functioning computer-assisted working environment that supports automation and collaborative working methods. This includes the CATE Next Generation and Euramis Next Generation projects.

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**CATE Next Generation** provides a server-based working environment for DGT translators, thus facilitating real-time data sharing and collaboration, the automation of preparatory work and the harmonisation and reengineering of processes. Its implementation continued with the roll-out of release 2, enabling translators to use and create **shared resources** via the GroupShare (6) infrastructure.

During the reporting period, DGT worked on migrating the remaining functionalities from Euramis to the **Euramis Next Generation** platform and added Ukrainian to the languages supported by the interinstitutional database (7). The tool now makes it possible to enrich the linguistic content with new and more metadata to increase the accuracy of retrievals and provide better information to translators.

The **re-usability rate** of Euramis segments was 46.9%. The **use of linguistic data assets** (8) rose to 92.1% from 87.7% in 2022. The **number of segments** (9) available in Euramis was 1.8 billion (+ 11% compared to 2022).

DGT further enhanced its re-use of linguistic data.



DGT continued to work on the **eDGT programme**, which will create an end-to-end platform covering all the steps and tasks of DGT's core business (see also Sections 3.2 and 3.4). Work was focused on

the review of core business processes and the definition of eDGT's technical architecture. DGT also drew up the eDGT programme charter as a living document to be updated and revisited as progress is made.

Progress on **TRèFLe Next Generation** - the first project under eDGT, supporting DGT's outsourcing workflow - was slower than anticipated. The analysis of the functionalities covered by the corporate eProcurement suite had to be rescheduled following discussions on the availability of resources among the participants in the project. Work started on an intermediary solution that will migrate the features of TRèFLe to DGT's workflow management application. DGT also started working on interfacing the current TrèFLe system with the Commission's new accounting system SUMMA, in cooperation with the Directorate-General for Budget (DG BUDG) and DG DIGIT. This is a prerequisite to maintaining DGT's ability to outsource translation work and deliver translations in a timely manner after the launch of SUMMA.

Following the full launch of ePoetry (10), including for Decide (11) and the Europa websites, DGT decommissioned its old application, Poetry. It started the **DGT4EdiT** project, dealing with the preparation of DGT's language and workflow applications for the introduction of

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<sup>(6)</sup> GroupShare is a server-based platform for translators, reviewers and terminology professionals, enabling easy sharing of translation projects, translation memories and terminology in real-time.

<sup>(7)</sup> Euramis is a large-scale linguistic data asset in the form of a translation memory database built up and curated by DGT staff since the mid-1990s. It is a key resource for DGT and an important component of the workflow of all EU institutions' translation services.

<sup>(8)</sup> Defined as the degree to which linguistic data in the form of previous translations and machine translation output is used to produce new translations.

<sup>(9)</sup> A 'segment' usually consists of a sentence or sentence-like unit (a heading, a title or an item in a list).

<sup>(10)</sup> ePoetry is the application used by Commission departments to request DGT language services.

<sup>(11)</sup> Decide is a tool covering the Commission decision-making process from programming to adoption.

EdiT, expected to become the Commission's new legislative drafting tool by the end of 2024.

DGT further improved the linguistic quality of **eTranslation**, with a full refresh of the 'EU Formal Language' domain and an upgrade of the available languages of non-EU countries (<sup>12</sup>) in the 'General Text' domain. DGT built and released **233 machine translation engines**.

233 eTranslation engines built and released

DGT continued to work closely 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. It made available an interinstitutional site to promote the use of ELISE, the tool for interinstitutional communication on translation files. The site gives access to the revised common guidelines on the use of ELISE and the communication requirements for its successor, ELI2E. DGT took the lead in the project to develop ELI2E and prepared a project governance structure in view of the official project kick-off, planned for early 2024. DGT also led an initiative to establish common data management rules for all EU institutions using Euramis.

Developing advanced digital competence has become an essential part of DGT's digital transformation and efficiency drive, in step with the growing maturity of DGT tools. A **digital skills self-assessment exercise** and a hands-on digital skills assessment exercise were carried out in the translation directorates and in the directorate for customer relations, respectively (see also Section 3.2). These assessments showed that the digital skillset in DGT is extraordinarily high, as also testified by the fall in the number of helpdesk tickets issued. DGT's network of **language technology coordinators** continued to contribute to the advancement of DGT's digital environment, guiding and supporting progress on digital skills, language technology and tools in the language departments and beyond.

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



To meet the Commission's sustained high demand for translation and other language services, DGT continued to manage its flexible and modular **resources mix**, combining **in-house staff** (officials, temporary agents and contract agents – see Section 3.1), **outsourcing** and **language technology** in the context of ongoing redeployment of posts. In 2023, DGT returned 58 posts to Commission's central pool, adding to the 122 returned in the first two years of the Multiannual Financial Framework 2021-2027.

**In-house staff** form the backbone of DGT's capacity and are key to ensuring the timely delivery of the most sensitive (highly political and/or confidential), difficult or urgent files. Pending the next round of EPSO competitions for translators still expected to be published

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<sup>(12)</sup> Arabic, Chinese, Icelandic, Japanese, Norwegian, Russian, Turkish and Ukrainian.

in 2024 (for Danish, Dutch, English, French, Greek, Italian, Maltese and Spanish), DGT prepared and launched temporary agent selection procedures for Croatian and Portuguese translators. It will run these procedures on its own, using application and testing platforms provided by the Directorate-General for Human Resources and Security (DG HR) and the Joint Research Centre (JRC).

DGT continued to offer its staff a wide range of **learning and development** opportunities, available through EU Learn, the European School of Administration and internally organised initiatives (see Section 3.1).

The crucial importance of **outsourcing** in DGT's resource mix was confirmed in the context of sustained high demand and continuing staff reductions. The outsourcing approach in place, involving close professional cooperation with contractors, proved again highly effective and efficient. The outsourcing rate reached 39.5%, with a very high quality of outsourced translations: **97.7% of outsourced documents were marked as 'very good' or 'good'**.

In 2023, DGT launched a **new call for tenders (TRAD23)** for the outsourcing of translation, receiving 151 eligible tenders. It finalised the evaluation of the tenders and prepared for the launch of the new framework contracts.

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

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

DGT promoted the **European Year of Skills** through all its flagship outreach projects.



Through the **Translating Europe Forum**, DGT continued to provide an invaluable space for the translation industry to assess and analyse the current status and the future of the translation profession. The 2023 edition attracted over 1 650 participants and focused on

ways to achieve excellence in translation: developing new skills, new processes to maintain and manage quality in the AI era, managing expectations and preparing today's linguists for tomorrow's job markets (13).

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<sup>(13)</sup> All recordings are available on the <u>Translating for Europe YouTube channel</u>.

DGT also held 44 **Translating Europe workshops** across the EU on a wide variety of topics, such as translator skills, the translation professions, translator training, language technology, machine translation and data literacy.

In March, DGT held the awards ceremony of the 16<sup>th</sup> edition of the **Juvenes Translatores** translation contest (<sup>14</sup>). The 17<sup>th</sup> edition took place in November, with 705 schools and some 3 000 students participating. When announcing the selected schools, DGT held a very successful online session on multilingualism and opportunities for learning



languages, attended by 250 classes and 6 000 participants from across the EU.



To celebrate the **European Day of Languages**, DGT collaborated with the Directorate-General for Education, Youth, Sport and Culture (DG EAC) on an online conference on **Teaching language skills at the heart of the European Education Area** and organised 73 events through its field officers posted in the Commission Representations in 25 EU countries.

As a contribution to the European Year of Skills, DGT started working on a visibility campaign to promote the translation professions to high school students, their parents, teachers and career counsellors, in cooperation with the **Language Industry** 

**Expert Group (LIND)**, which provides industry expertise for DGT outreach projects, and with the **European Master's in Translation (EMT) network**. The latter organised two meetings. The first meeting revolved around technology and translation skills, while the second was hosted by the University of Salamanca as part of the European Year of Skills events in Spain, and focused on upskilling translators for the AI era. In September, DGT launched the new **EMT call for membership** for 2024-2029.

#### DGT's outreach work also included:

- the third high-level 'Clear Writing for Europe' conference, attended by 1 300 participants, which focused on clear language to support democracy and transparency in the EU;
- 12 missions carried out to 10 countries under the Visiting Translator
   Scheme (15), and

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<sup>(14)</sup> The contest is open to 17-year-olds in schools across the EU and aims to promote translation and the use of foreign languages. More information is available at <a href="https://europa.eu/!fd96cv">https://europa.eu/!fd96cv</a>. The recordings of the award ceremony are available at <a href="https://www.youtube.com/watch?v=K6K23tKeguo">https://www.youtube.com/watch?v=K6K23tKeguo</a>.

<sup>(15)</sup> For more details on the Visiting Translator Scheme, see <a href="https://commission.europa.eu/about-european-commission/departments-and-executive-agencies/translation/visiting-translator-scheme-vts">https://commission.europa.eu/about-european-commission/departments-and-executive-agencies/translation/visiting-translator-scheme-vts</a> en.

• the organisation of two virtual visits in 24 languages + Ukrainian for university students and professional translators, with over 3200 participants.

DGT promoted all these activities via its network of field officers, the Europa web pages and its **social media**. All DGT's accounts gained new followers in 2023. Instagram was the fastest growing channel (+18% compared to 2022) and the tongue-twister videos for the European Day of Languages achieved the highest engagement levels.

The work of the interinstitutional committees for cooperation among translation and interpretation services continued under the presidency of the European Parliament. The most pressing issue was the organisation of joint EPSO competitions for translators.

#### Spotlight on DGT's international cooperation activities

 DGT had a representative elected to the Executive Committee of the International Annual Meeting on Language Arrangements, Documentation and Publications (IAMLADP), co-chairing the working group on language services and publishing.



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- DGT presented recent developments in generative AI at the International Annual Meeting on Computer-Assisted Translation and Terminology (JIAMCATT).
- DGT contributed to the work of **ISO Technical Committee 37** on Language and Terminology. DGT experts were involved as project leaders in an ongoing standardisation project on translation project management (ISO 11669), together with representatives from the European Parliament.
- DGT hosted the joint meeting of the working groups on terminology and new technologies of the **Conference of Translation Services of European States** (**COTSOES**) (<sup>16</sup>) in Luxembourg. It was the first time that the two groups had a joint meeting and that DGT hosted a COTSOES meeting.
- In cooperation with DG NEAR and the Regional School of Public Administration of the Western Balkans (17), DGT organised a series of **translation capacity-building seminars** for the Translation Coordination Units of the Western Balkan countries and of Ukraine, Moldova and Georgia to provide technical input to their linguistic preparations and facilitate networking and sharing of experiences.

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<sup>(16)</sup> http://www.cotsoes.org/

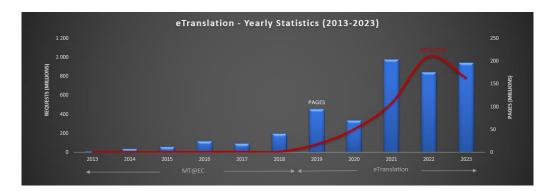
<sup>(17)</sup> https://www.respaweb.eu/

#### 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

To support **digital multilingualism**, DGT further developed its well-integrated machine translation system **eTranslation**, which it runs in collaboration with DG CNECT and DG DIGIT under the **Digital Europe programme**. eTranslation is a leading example of secure use of AI, complying with EU intellectual property rights and data protection rules, and providing large-scale translation when human translation is not feasible or necessary.

Use of eTranslation remained high, with over **196 million pages** translated. The highest share of requests came from EU institutions, both individual users and IT platforms. Many Member State bodies or Digital Europe programme projects were also very active. The trend of using eTranslation for short texts ('snippets') rather than full documents continued: there were over 782 million requests. Among the biggest users were the JRC's Europe Media Monitor, the EU Open Data Portal and the European Central Bank's Athena project, which helps bank supervisors to spot and assess new risks. The **eTranslation widget**, which makes it easy to add eTranslation to Europa websites, was used on 159 sites, providing nearly 7 million pages of translation. A solid increase was registered in the number of pages delivered to Member States.



DGT continued to promote eTranslation to eligible users (<sup>18</sup>) in the EU, including to **national investigative agencies** in coordination with the European Public Prosecutor's Office, and signed a memorandum of understanding with the European Schools (<sup>19</sup>). Following Ukraine's association to the Digital Europe Programme, DGT held a **capacity-building session on eTranslation for Ukrainian ministries** and gave several presentations to Ukrainian universities.

A milestone in the expansion of eTranslation was a 6-month development **access to the MeluXina supercomputer in Luxembourg** - part of the European High Performance

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<sup>(18)</sup> Member State public administrations, university staff and students, participants in the Digital Europe programme, small and medium businesses and non-governmental organisations.

<sup>(19)</sup> The memorandum concerns the use of eTranslation to translate exam papers to be post-edited by teachers. eTranslation was promoted to over 4 000 teachers and other staff.

Computing Joint Undertaking - for a research project aimed at building larger translation models with more neural connections, with significant leaps in the quality of outputs.



'Europe has always been a continent of pioneers and innovators. And we should continue to explore the frontiers of innovation also on artificial intelligence.'

Ursula von der Leyen, President of the European Commission

The family of **Al-powered services** developed by DGT under the Digital Europe programme continued to grow in 2023, with the launch of **eSummary** - a multilingual automated tool to summarise documents. DGT continued to explore new practical implementations of Al, including by leading the Commission's Al@EC network (see Section 3.2 for details). DGT also expanded the language coverage of its **speech-to-text** service, which now covers 21 EU official languages and 7 languages of non-EU countries.

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## 2. INTERNAL CONTROL AND FINANCIAL MANAGEMENT

Assurance is provided on the basis of information on the efficiency and effectiveness of internal control systems and governance processes. The management monitors the functioning of the internal control systems on a continuous basis and carries out an objective examination with internal and external auditors. The results are explicitly documented and reported to the Director-General. The following reports/documentation have been considered:

- weekly reports on demand management and outsourcing;
- monthly budget execution reports and quarterly management information scoreboards 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 Director-General of Translation.

This section covers the control results and other relevant elements that support management's assurance. It is structured into 2.1. Control results, 2.2. Audit observations and recommendations, 2.3. Effectiveness of internal control systems, and resulting in 2.4. Conclusions on the assurance.

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#### 2.1. Control results

This section reports on the control results used by management to support the assurance on the achievement of the internal control objectives (ICO) (<sup>20</sup>). 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 (in commitments)**

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

In 2023, DGT managed EUR 40.8 million of expenditure (21) with direct responsibility for EUR 29.05 million (the rest being appropriations for external personnel and credits delegated to other DGs). Credits delegated by other DGs to DGT amounted to EUR 4.9 million. They mainly cover external translation costs (EUR 2.9 million committed). DGT committed EUR 0.6 million delegated by DG EAC for the organisation of external communication activities under Key Action 3 on multilingualism (22). DGT also committed EUR 1.4 million delegated by DG CNECT under the Digital Europe work programme for eTranslation. Finally DGT committed EUR 0.05 million delegated by DG DIGIT for the implementation of the 'Interoperable Europe' chapter of the Digital Europe programme.

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 budget managed (credits received in delegation or own budget).

Legal commitments by procurement type	Budget (€ 000)	% of total budget	Number of transactions	% of total transactions
Type 1: DGT FWC & NP - external translation	21 408	73.7%	23 855	92.4%
including credits delegated by other DGs				
Type 2: DIGIT FWC (IT) + other IT expenditure	5 969	20.5%	74	0.3%
(incl. credits delegated by CNECT)				
Type 3: Low-value NP, AMI, FWC (from other	1 231	4.2%	332	1.3%
DGs) (conferences and events inc. credits				
delegated by EAC, library expenditure,				
terminology)				
Type 4: Missions	443	1.5%	1 569	6.1%
Total	29 051**		25 830	

<sup>\*\*</sup> Figures including delegated credits received from other DGs, excluding external staff Source: DGT Budget Execution Report and internal statistics

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<sup>(20) 1)</sup> 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; 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.

<sup>(21)</sup> Amount of legal commitments made during the year, including delegated credits from other DGs.

<sup>(</sup> $^{22}$ ) 2023 annual work programme – Erasmus+, Commission Implementing Decision of 25/08/2022 [C(2022)6002] and amendments thereof [C(2023) 1482].

DGT has a partially decentralised financial circuit for commitments and a fully centralised financial circuit for payments (i.e. the financial unit authorises all payments). The level of controls in both circuits depends on the estimated risk of the transactions, which is linked to the procurement type. If the estimated value of the procurement is above EUR 15 000, or for complex files involving e.g. intellectual property rights, DGT legal team is involved in the verification process before the budgetary or legal commitment to ensure its legality and regularity. DGT has increasingly introduced automated checks on invoices for outsourced translations: most transactions are subject to batch verification and authorisation.

DGT does not manage programmes and grants and has a control strategy based on **comprehensive** *ex ante* **controls**. Therefore, *ex post* controls only involve accounting controls. Any errors identified are corrected before contracts are signed or payments authorised.

Management of outsourced translations (ca. 74% of DGT's 2023 budget in commitments): In 2023, DGT performed *ex ante* controls, reviewing the tender documents for the TRAD23 open call for tenders. 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. If a language combination is not covered by a lot in the framework contract or if no contractor responds to the call, the contract is awarded by a very low value negotiated procedure which is clearly documented and regularly updated.

Effectiveness indicators — procurement	
Number of framework contracts terminated in 2023  • For lack of use  • For poor performance of contractor	0 0

Source: DGT internal statistics

For this segment, 22 exceptions and 1 non-compliance event were recorded (<sup>23</sup>). They related to procurement *procedural* errors which are not *payment* errors and therefore have no impact on the budget. The used exceptions related to 13 cases of negotiated procedures above the threshold of very low value and 2 cases above the threshold of low value but below the threshold of middle value negotiated procedures.

Management of outsourced translations is closely monitored under the relevant control system by the finance unit in cooperation with the external translation unit. Exceptions for exceeding the threshold for very low value negotiated procedures (per year and per language combination) are visaed by Director for Risk Management and Internal Control and approved by Director General. They clearly specify the justification for the relevant business need. In addition, all senior management as well as the middle management for language departments receives bi-monthly information on the budget committed under

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<sup>(23) 20</sup> different language combinations were under exception. However, 5 exceptions were not used, so this segment concerned only 15 language combinations in the end.

negotiated procedure per language combination, to be able to make an informed decision on outsourcing.

Contractors submit invoices via a dedicated portal. All translations are quality controlled by DGT staff before the contractor is authorised to issue an invoice which is automated, further reducing the risk.

Effectiveness indicators — financial transactions						
% error rate prevented	99.5%					
Amount of liquidated damages (for bad quality)	€30 987					
Amount of liquidated damages (for late delivery)	€1 680					
Percentage of translations rated good or very good by the evaluators	97.7%					

Management of IT contracts (ca. 20% of DGT's 2023 budget in commitments): For this segment, there were no non-compliances or exceptions. Since 2019 DGT has had an 8-year framework contract in place for the computer-assisted translation tool, while it uses framework contracts provided by DG DIGIT for all other operations. Final contracts, timesheets, and invoices are checked before the finance unit authorises the payments.

Effectiveness indicators — financial transactions						
% error rate prevented	99.5%					
Number of control failures	0					
Amount of liquidated damages	0					

#### Management of other activities (ca. 4% of DGT's 2023 budget in commitments):

This concerns mostly low and 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. DG COMM, DG Interpretation). 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 or for complex files involving e.g. intellectual property rights, also DGT legal team reviews the documents. The finance unit checks the final contracts, delivery reports, and invoices.

For this segment, there were 3 exceptions and 12 non-compliances. They concerned mostly purchase orders countersigned after the date of delivery, including cases when contractors had used regular mail services to send blue ink signed contracts. They had no impact on the budget. To prevent these occurrences, DGT instructed contractors in the Member States to send any blue ink signed contracts to the DGT field officer in the relevant Commission Representation so that the contracts can be uploaded onto the Commission's document management system for signature by the AOSD, while the originals are sent to the headquarters by diplomatic pouch, cutting down the delivery time.

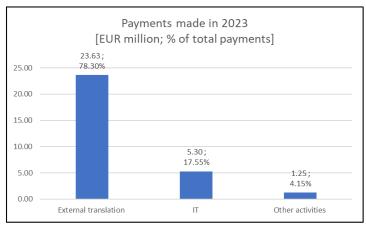
**Management of mission orders and cost declarations (ca. 2% of DGT's 2023 budget in commitments):** DGT took back the management of staff mission orders from PMO, while the management of declarations of costs stayed in PMO. 1 569 missions were

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carried out (up from 1 186 in 2022), out of which 19 encodings of missions were late. There were no errors that involved a financial impact.

#### **Expenditure (in payments)**

The table below shows all 2023 expenditure in payments, broken down by the portfolio segments managed by DGT.



Source: DGT Budget Execution Report and internal statistics

#### Revenue

In terms of **revenue**, in 2023 DGT issued:

- debit notes for EUR 2 134 104 to EU and partner institutions for the use of shared IT translation tools within the interinstitutional Annual Financing Agreement;
- debit notes for EUR 55 000 to the Translation Centre for the Bodies of the European Union (the 'Translation Centre') for the local installation of eTranslation under the memorandum of understanding between DGT and the Translation Centre;
- debit notes for EUR 17 393 to other Commission departments as internal chargeback for external translation (i.e. when not covered by delegation);
- debit notes for EUR 71 965 stemming from performance penalties under the framework contracts linked to external translation.

For all types of revenue, financial procedures are in place and updated.

In line with the 2018 Financial Regulation, 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

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#### 2.1.1. 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.

#### 1) Control objective

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.

#### 2) Assessment of the control results

DGT's control results proved to be robust and adequate for the management of DGT files during 2023: measures applied by DGT management effectively mitigated risks; same *ex ante* controls on managed budget irrespective of its owner ensured coherent checks of commitments and payments, and automated checks on invoices for outsourced translations significantly reduced the risk of human error.

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 implemented in 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 2023, procurement procedural errors occurred for the segment 'external translation'. The full amount paid under these procurement procedural errors is considered to be at risk even if there is no financial impact. The error rate for this segment is 1.39%, down from 1.94% in 2022 and from 3.60% in 2021, inter alia thanks to mitigating measures such as a close monitoring of spending levels by the responsible units.

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Strong internal controls ensure that DGT's resources are used for their intended purposes, limiting to a big extent the risk of resource misuse. For more details on performance indicators, see Annex 7. In conclusion, **controls are effective, and weaknesses**detected are addressed.

#### 3) Supervision of decentralised agencies

of the European Union (the 'Translation Centre'). The Director General of DGT is the chair of the Translation Centre's Management Board. The Deputy Director General of DGT is the Commission's representative on the Management Board. The Management Board adopts among others the annual activity reports, the budgets and the programming documents of the Translation Centre. These and the summaries of the Management Board decisions are publicly available on the Translation Centre's website.

The main task of the Translation Centre is to cover the language service needs of the other EU agencies. The Translation Centre is self-financed, so unlike most other decentralised agencies, it is not subsidised from the budget of the EU. Its costs are partially and indirectly covered by the EU budget through the payments for requested translations made by those agencies that are subsidised. The other part is covered by the payments made by those agencies that are either self-financed through fees or partially self-financed. This means that **DGT does not delegate any budget to the Translation Centre**.

#### 4) Overview of DGT's risk profile

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

This is, respectively, thanks to the inherent risk profile of the types of expenditure managed by DGT and the performance of the related control systems, including the increasing number of automated checks.

This internal assessment of DGT's risk profile is confirmed by limited audit engagements carried out in DGT in 2023 and before by both the European Court of Auditors (ECA) and the Internal Audit Service (IAS). The 2023 assessment of Internal Control Monitoring Criteria showed DGT's internal control functions well, and all indicators (except three) met the targets. In summary, **DGT does not report on any control weaknesses**.

#### 5) Table X: Estimated risk at payment and at closure

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:

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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.

DG DGT	Payments made	Relevant expenditure		risk (error payment	Estimate correc	tions	Estimat (error ra clos	te %) at
	m EUR	m EUR	m EUR	%	m EUR	%	m EUR	%
Outsourcing	23.63	23.63	0.33	1.39%	0.00	0.00%	0.33	1.39%
IT	5.30	5.30	0.03	0.50%	0.00	0.00%	0.03	0.50%
Other	1.25	1.25	0.01	0.50%	0.00	0.00%	0.01	0.50%
DGT total	30.18	30.18	0.36	1.20%	0.00	0.00%	0.36	1.20%

The <u>estimated overall risk at payment</u> for 2023 expenditure, 1.20%, is the AOD's best conservative estimate of the amount of relevant expenditure during the year, not in conformity with the contractual and regulatory provisions applicable <u>at the time the payment was made</u>. Since DGT does not carry out *ex post* controls (as explained in annex 6) no further corrections to the expenditure are expected and the estimated future corrections are thus set at 0%. As a result, <u>the estimated overall risk at closure</u> corresponds to the estimated overall risk at payment (<sup>24</sup>).

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.

#### 6) Preventive and corrective measures

For the reasons explained under 'Control objective', the financial impact of *ex ante* controls is non-quantifiable, and *ex post* controls are used only for accounting purposes. There is a negligible amount of pre-financing payments at DGT, and recovery orders are carried out not based on errors in payments but on a monthly system of performance penalties under the framework contracts for outsourced translations. Also, thanks to the automated system for processing transactions for outsourced translations, there are basically no non-eligible cost claims in this largest segment. Therefore, due to the robustness of preventive and control measures, the financial impact in this context is non-applicable.

#### 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. It is updated every 4 years based on DGT's strategic plan,

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<sup>(24)</sup> For *procedural* errors, the Commission does not consider that the full amount is at risk (no *payment* errors). However, for transparency and to allow comparison of 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).

and was last comprehensively updated on 15 December 2020, following a thorough fraud risk assessment. It is also updated as and if needed (last time on 30 May 2022). Its implementation is being monitored and reported to the management **twice a year** in biannual internal control reports. All necessary actions have been implemented, with the update of sensitive functions finalised in March 2024. DGT follows corporate rules for reporting serious wrongdoing such as fraud and corruption, and serious failures to comply with professional duties (articles 22a and 22b of the Staff Regulations).

DGT also contributed to the Commission's revised anti-fraud strategy Action Plan of July 2023, notably to **theme 7, 'Strengthen the culture of ethics and anti-fraud in the Commission'**. The results achieved 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 2023. There were no OLAF recommendations issued for DGT between 2019-2023. Therefore 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 OLAF in 2023. In 2023, IDOC registered 3 new cases related to DGT staff, one of which has already been closed as a non-case. On the basis of the available information, DGT has reasonable assurance that the anti-fraud measures in place are effective overall.

#### c) Safeguarding of assets and information (if applicable)

Not applicable (25).

#### d) Reliability of reporting

DG BUDG has assessed DGT's financial profile at low risk; this has been confirmed by auditing services. See more under Section 2.2. Audit observations and recommendations.

In 2023, DG BUDG assessed DGT's accounting risk based on the analysis of the Accounting Quality plan as a high-level completeness check and review. It did not calculate the accounting risk score. The analysis performed within DGT was shared with DG BUDG. The conclusion was that the accounting quality in DGT is **high**, and no structural problems had been identified. Therefore, DGT concludes that the reliability of reporting is also high.

#### 2.1.2. Efficiency of controls

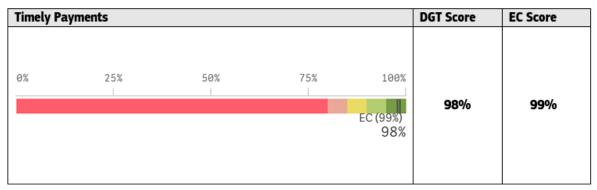
The time-to-pay indicator (Article 116.1 of the Financial Regulation) for 2023 is 99% of payments made within the deadline (number of payments) and 98% (amount paid) (26). The

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<sup>(25)</sup> 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.

<sup>(26)</sup> In early 2023, a technical issue between central system ABAC and local system Trèfle halted several invoices for many weeks and its resolution took longer than expected. This undermined the excellent

relevant number of payment requests implemented in 2023 was 5 146, out of which there were 71 late payments (1.38%) in the overall amount of EUR 662 849.72 (2.20%).



(Source: Financial Dashboard – Annex 4)

	2021	2022	2023
Time-to-pay			
<i>Number</i> of payments within			
time limit	95.5%	99.3%	99%
Amount paid within time limit	97.0%	99.4%	98%
Average payment times			
Average net/gross payment	8.8/9.7 days	8.3/8.6 days	9.5/9.3 days
time*			

Source: SAP. See Table 6 in Annex 3.

DGT has a fully centralised financial circuit for payments and handles a high volume of very low-value transactions. Some controls are automated by the local IT system (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 2023, DGT continued to use and promote the 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.

Other efficiency indicators (including the percentage of cost over annual budget) are available in Annex 4. Based on the good results obtained, DGT concludes positively on the efficiency of the controls.

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<sup>\*</sup>Net is without suspension delays/gross includes suspension delays.

performance and explains why 98% of payments were paid on time in terms of amount and 99% in terms of number.

#### 2.1.3. Economy of controls

The estimated cost of controls concerns the management of outsourced translations and IT budget lines (i.e. around 95% of DGT's commitment appropriations). It is independent from the type of funds used (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 (27).

For **outsourced translations**, controls account for 6.09% (up from 5.6% in 2022 and down from 6.45% in 2021) i.e. EUR 1.44 million. This stems from the very high number of transactions (23 855). 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 2022.

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 the development and maintenance of the in-house IT system that processes the bulk of financial transactions. 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 2.3% (up from 1.6% in 2022) i.e. EUR 0.12 million, including legality and regularity checks.

For the **management of other activities**, the cost of controls is not calculated because their budget share in overall activities is negligible.

The **total cost of control** for DGT in 2023 is estimated at 5.17% (up from 4.8% in 2022) i.e. EUR 1.56 million. This is linked to the indexation and subsequent increased costs of human resources in 2023. See Table Y in Annex 7 for details.

#### 2.1.4. 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.

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<sup>(27)</sup> 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.

As explained in previous sections, DGT manages a very high number of low and very low value transactions (23 855 alone for external translation budget line) in relation to the size of its legally committed budget (EUR 29.05 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, events, and knowledge acquisition), 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 that all goods and services procured meet the needs they are designed to cover. No new financial or control issues were identified in 2023.

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#### 2.2. 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.

In 2023, the IAS started a horizontal audit on 'IT security risk management at the Commission', which covers DGT. All recommendations from previous IAS audits have been closed.

The Translation Centre was covered by an audit by IAS on Information technology security management, which was still ongoing at the end of the reporting period. Based on all the work undertaken by the IAS in the period 2019-2023, and taking into account the actions taken by DGT's management, the IAS concluded that the internal control systems in place for the audited processes are effective.

There were no audits by ECA in 2023, or any pending recommendations.

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

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## 2.3. 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 2023 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. The conclusions, presented below, were approved by the director in charge of risk management and internal control and by the 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.

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#### 2.4. Conclusions on the assurance

This section summarises the assessment of the elements reported above (in sections 2.1, 2.2 and 2.3), 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 (28). For 2023, DGT was positively assessed with regard to 11 standard financial indicators at corporate level (see Annex 4).

Processes, systems and workflows for all sectors of DGT activity are documented and updated on a regular basis. A mid-term review of DGT's management plan summarises 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 subdelegation 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 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. allowed senior management to conclude positively on the effectiveness, efficiency, and economy of controls in place in DGT.

Section 2.2 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 Director-General of Translation.

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

DGT's management has assessed that the internal control system is functioning as intended (Section 2.3). DGT does not entrust funds nor budget implementation tasks to the Translation Centre (decentralised agency). The Translation Centre's Management Board, chaired by the Director-General of Translation, will assess the Centre's 2023 annual consolidated activity report by mid-June 2024.

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 Director-General, in his capacity as Authorising Officer by Delegation, has signed the Declaration of Assurance.

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<sup>(28)</sup> An exceptionally higher error rate for one segment of its budget (outsourced translation) of 3.6% in 2021 fell to 1.94% in 2022 and to 1.39% in 2023, inter alia thanks to mitigating measures such as a close monitoring of spending levels by the responsible units.

#### 2.5. Declaration of Assurance

#### **Declaration of Assurance**

*I, the undersigned,* 

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 (29).

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 ante controls, and 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, 27 March 2024

(e-signed)

Christos ELLINIDES

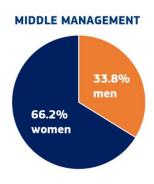
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<sup>(29)</sup> True and fair in this context means a reliable, complete and correct view on the state of affairs in the DG/Executive Agency.

#### 3. MODERNISING THE ADMINISTRATION

#### 3.1. Human resource management

DGT continued to use its resources in a **flexible way** (see specific objective 7.3), in line with the objective to be a **future-proof organisation** set out in DGT's strategic HR framework. In the context of ongoing redeployment of posts, DGT returned 58 posts to Commission's central pool, adding to the 122 returned in the first two years of the current Multiannual Financial Framework 2021-2027. DGT launched temporary agent selection procedures for Croatian and Portuguese translators in collaboration with DG HR.



Recruitment to management positions continued in line with the Commission's objectives to achieve **gender equality**. Under the scheme to promote first female appointments, DGT appointed two new female middle managers out of the target of seven for 2023-2024. On 31 December 2023, **66.2% of DGT's middle managers were women**. In step with the second pillar of DGT's strategic HR framework of being a **welcoming**, **diverse and inclusive organisation**, DGT adopted its **equality mainstreaming work plan for 2023-2024**, and

implemented initiatives on equality, diversity and inclusion in the workplace, such as the initiative to mark the International Day against Homophobia, Transphobia and Biphobia.

In line with the third pillar of DGT's strategic HR framework, DGT as a **learning organisation** continued to value **learning and development** for all staff in all areas, as a key factor in the continuous development of the skillsets needed in the workplace. The training offer focused on thematic, digital, managerial, language and soft skills, combined with upskilling for several functions and organisational development for teams and DGT as a whole. Formats ranged from classroom and online training to e-learning modules, job shadowing and teambuilding events.

DGT continued to provide supportive working conditions and to accompany staff in the transition to more flexible ways of working. It carried out targeted communication measures to foster **staff engagement and well-being**, including through meetings between senior management, staff and trainees, and kept staff informed of progress in the actions agreed on as follow-up to the Commission's 2021 staff survey, notably the concrete measures to reduce demand for translation and the consequent workload. DGT communicated regularly with staff on developments regarding its **future premises** in Brussels and Luxembourg. It set up **dedicated working groups**, consisting of representatives from all its directorates and main interest groups, to start preparing the ground and ensure staff involvement in the operational aspects of the office moves taking place in 2024 for DGT's Brussels-based staff and for some staff based in Luxembourg.

See Annex 10 for more information on human resource management.

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#### 3.2. Digital transformation and information management

#### **Digital transformation**

DGT continued to implement its digital master plan for 2021-2024, making progress on its key **digital transformation projects** – its multiannual flagship eDGT programme, eTranslation and other AI-powered language services, CATE Next Generation, and Euramis Next Generation, in full alignment with the objectives of the Commission's digital strategy. DGT's activities contributed to the objectives of fostering a digital culture, empowering business-driven digital transformation and ensuring a seamless digital landscape.

As to the **eDGT programme** (see also specific objective 7.2 and Section 3.4), DGT worked on the core business process review, with the objective of streamlining, simplifying and harmonising processes and working methods. The improvements identified include:

- better ergonomics through a single user interface, adapted to the role of the user;
- streamlined, integrated communication within a single workflow application;
- automatic collection and central availability of relevant data;
- automation of routine checks and tasks;
- decision making (e.g. work allocation) supported by data, data analytics and AI.

DGT worked on identifying the most suitable technical platform for eDGT. It implemented the prototype of a simplified translation workflow using the corporate offering (Compass Corporate), with good results, and will also assess the commercial alternative.

#### DGT in the lead of AI explorations in the Commission

- DGT launched eSummary a multilingual automated text summarisation tool - as a full Commission service and as part of the AI-based services under the Digital Europe programme.
- of ©Wanicon via Canya.com
- In recognition of its role in pioneering AI applications in the Commission, DGT was mandated by the Information Management Steering Board to lead the AI@EC Network, focusing on identifying new AI use cases and needs, exploring new projects and building and sharing knowledge. The first result of the collaborative Commission-wide explorations was the design and development of eBriefing, using generative AI to produce first drafts of briefings.
- DGT also ran a number of pilot projects, namely:
  - an evaluation sampler to automatically generate samples for evaluating outsourced translations;
  - TermiteOne, a tool for the extraction of terminology from documents;
  - a tool for assisted editing; and
  - a prototype application for detecting semantically similar documents.

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DGT completed the migration to the Commission's new digital environment **WELCOME**, offering increased security and state-of-the-art collaborative tools. DGT's network of M365 champions in language and horizontal directorates helped colleagues to make the best possible use of M365 and support the transformation of key work processes.

#### Information and IT security rules

DGT revised its IT security plan and appointed a System Security Officer to lead IT security improvements and the review and implementation of the Commission's IT security strategy for 2023–2024. Work focused on ensuring that data in GovIS2 is up-to-date and accurate and encoding relevant information in the 'Governance Risk and Compliance' tool to assert the technical compliance of IT systems with the security standards in force. DGT continued to invest in raising staff awareness about **cybersecurity**. DGT cyber ambassadors (including staff who had taken part in the Commission-wide cybersecurity training programme) organised sessions on security threats in everyday work and in private life. DGT took steps to ensure that newcomer training includes a cybersecurity component.

#### Data, information and knowledge 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. Over the reporting period, DGT updated its **data action plan**, focusing on consolidation and improvement of existing language data sources, AI-related actions and eDGT data architecture.

Digital skills are essential for DGT staff to keep pace with technological advances. In 2023, DGT carried out **digital skills assessments** (see also specific objective 7.2) to monitor the digital confidence of staff and drive targeted skill development. DGT organised **285 digital and IT-related training sessions** on the migration to Welcome and M365, the use of computer-assisted translation tools and on other



specific IT-related needs. DGT also organised **145 knowledge sharing events** and prepared new e-learning modules on terminology for newcomers, traineeships in DGT and the EMT. To facilitate the onboarding of newcomers, DGT made available **newcomers learning paths** and a revamped newcomers' corner on its **Sophia portal**.

#### **Data protection**

DGT's operational controllers and record editors continued to make sure DGT met its data protection obligations. The newly appointed Data Protection Coordinator continued to ensure DGT's compliance with data protection rules, with the support of DGT's legal team. She held ad hoc meetings with controllers and record editors on updating the Data Protection Records Management System and continued to **raise staff awareness** by organising and/or participating in dedicated information sessions on specific aspects of data protection.

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#### 3.3. Sound environmental management

DGT supported initiatives to increase its staff's awareness about and involvement in environmentally friendly practices at the workplace, with a view to contributing to the Commission's aim of reaching climate neutrality by 2030. It continued to implement the 'Greening the Commission' action plan (30) and organised local actions based on the Commission-wide Eco-Management and Audit Scheme (EMAS) action plan.

DGT stepped up communication on EMAS matters by mainstreaming EMAS information and regularly publishing ECO-tips in its online **Green DGTips** newsletter. DGT took part in the Commission's 'building energy savings together' initiative by closing one building in Luxembourg and one in Brussels over the month of August and by closing buildings in Brussels over the winter holiday period.

Concerning waste reduction, DGT participated in a Commission-wide initiative on the collection and recycling of clothes and electric devices and successfully ran spring and autumn cleaning trails in the streets adjacent to DGT's buildings in Brussels. It continued to promote a green workplace and sustainable meetings by eliminating single-use items and encouraging paperless workflows.

platform rolled

out to all

Commission

staff

With the aim of **reducing CO<sub>2</sub> emissions**, DGT launched an innovative **car-pooling platform** to facilitate car sharing for work-related commuting and missions, which was rolled out in spring to all Commission staff and quickly gained recognition.

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<sup>(30)</sup> For more information see <u>People first – Greening the European Commission</u>

#### 3.4. Examples of economy and efficiency

DGT further automated its outsourcing workflow and started analysing the effort needed to extend outsourcing automation to sensitive non-confidential files. Around 81% of outsourcing requests are now automated, up from around 68.5% in 2022. This reduces the administrative burden for translators and assistants in language departments and for staff in DGT's external translation unit.

As part of the preparatory stage of the **eDGT programme** (see also specific objective 7.2 and Section 3.2), DGT continued the business process analysis of its core processes to identify elements that could be simplified, streamlined, harmonised, automated or improved. eDGT is designed to 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 it to other EU institutions and bodies for an annual fee. This generates 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 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 cooperation with DG COMM and DG DIGIT, DGT expanded the language coverage on Europa and other EU platforms through eTranslation, at minimum marginal costs for the EU budget (see specific objective 2.1).

As part of its work to explore the **potential of AI** (see also Section 3.2), DGT developed a number of tools and prototypes that can contribute to a **smoother and more efficient** translation workflow. One example is the AI evaluation sampler prototype, which has the potential to significantly reduce the time DGT spends on sampling for the evaluation of outsourced translations. Other initiatives, including the collaborative explorations carried out within the AI@EC network, go beyond the translation workflow and have the potential to enhance operational efficiency across the Commission. Examples include **eSummary**, which enables very fast scanning of the contents of documents, helping Commission staff to decide if a document or parts of it need to be submitted for translation, and the prototype for **eBriefing** - using generative AI to produce first drafts of briefings.