Ref. Ares(2020)1968413 - 07/04/2020

European Commission

2019

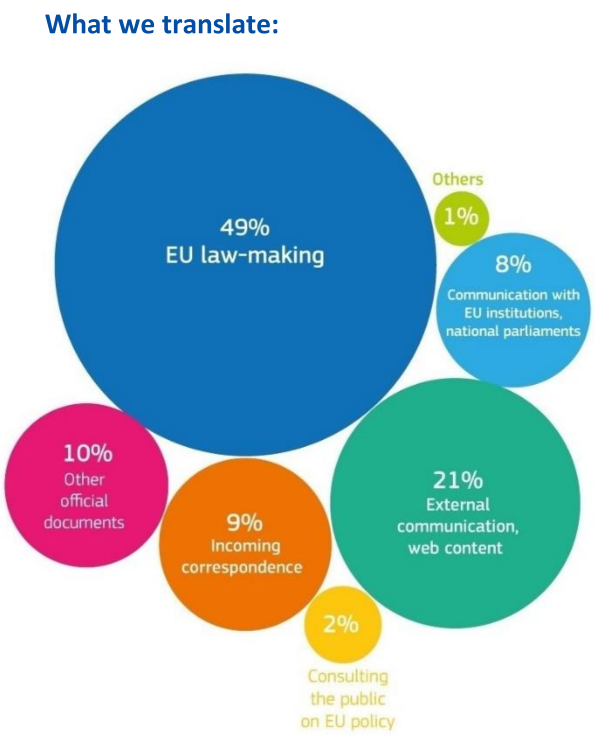
Annual Activity Report

DG Translation

Table of Contents

THE DG IN BRIEF

DGT's overarching goal is to provide the European Commission with **high-quality translation and other language services**. Alongside conventional translation work, by far the biggest part of its core business, DGT is also active in the areas of editing, web editing, web translation, language localisation, machine translation and terminology. These activities are mostly demand-driven and supported by quality management, outsourcing and administrative functions.



DGT's job is to provide the services necessary to respect the European Union's multilingual character by making sure the Commission produces clearly written documents in all official languages of the EU 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.

By implementing 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, while also contributing to the development of each official language and the translation profession at large.

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.

Part I (Policy achievements) sets out in detail how DGT carried out its mission in 2019.

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].

a) Key results and progress towards the achievement of the Commission's general objectives and DG's specific objectives (executive summary of section 1)

Contribution to the Commission's objectives

Multilingual law making and communication is a hallmark of the EU and its cultural diversity. DGT enabled the Commission to propose legislation, implement decisions, uphold the EU treaties and communicate its day-to-day **work in all official languages**.

DGT contributed to the **Juncker Commission's general objective** of effectively and efficiently managing and safeguarding its assets and resources, and attracting and developing the best talents, and to the **von der Leyen Commission's general objective** of a 'A modern, high-performing and sustainable European Commission'.

By making legislation and information available to people in a language they understand, DGT helped the Commission to communicate better with EU citizens and make the EU more open, accountable and democratic, contributing to the **Juncker Commission's general objective** of a 'Union of democratic change', and to the **von der Leyen Commission's general objective** of 'A new push for European democracy'.

DGT´s machine translation system, eTranslation, is one of the Commission's state-of-the-art machine learning applications available to all EU officials, national administrations and EU platforms. As such, eTranslation contributed to the **Juncker Commission's general objective** of 'A connected digital single market' and to the **von der Leyen Commission's general objective** of 'A Europe fit for the digital age'.

Key results in 2019

- In 2019, DGT translated 1,976,964 pages. One of the biggest achievements was delivering 21,684 pages related to the **hearings of the Commissioners-designate** between 23 September and 6 October and from 11 to 18 November. DGT's **deadline compliance rate** rose from 99.4% in 2018 to 99.5% in 2019.
- DGT **edited** 32 out of 61 adopted **major initiatives** (52%). DGT also marked **10 years of the clear writing campaign** with a range of activities, including the **Clear Writing for Europe conference** and a local clear writing campaign in the Secretariat-General.
- The volume of pages outsourced decreased to 622,992 pages, due to the lower overall production in 2019; the **outsourcing** rate thus amounted to 31.5%. Although the rate remains below the interim milestone for 2018 (33%), the Strategic Plan 2016-2020 recognised that the need to increase outsourcing would be calibrated according to the level of demand to ensure optimal use of resources.
- DGT launched a **new call for tender** for translation services (TRAD19) aiming at higher quality and better reliability of outsourcing through building a close partnership with our contractors.

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

- DGT **signed a major framework contract** for an interinstitutional computer assisted translation (CAT) tool.
- **eTranslation** – the Commission's **neural machine translation** service – continued supporting DGT translators in their work. In 2019, an assessment confirmed the usefulness of eTranslation for all language departments. DGT switched to the new neural technology and to the cloud, phasing out its locally hosted statistical machine translation technology.
- eTranslation also continued delivering translation to all EU institutions and agencies, public administrations in Member States and a number of digital service infrastructures (DSIs). To develop further the Commission´s language technologies and leverage linguistic data, DGT signed a **memorandum of understanding on language technologies** with **DG CNECT**, **DG DIGIT** and **DG SCIC** and started a discussion on forming a **centre of excellence** in this domain.
- DGT participated in the **Workshop on Machine Translation**, a worldwide research conference, with very good results in all categories it competed in, including a second-place ranking on one topic.
- DGT worked on its **data management** policy, completing its inventory of data assets and adopting a vision paper for a revamp of its main linguistic data base Euramis, improving the future reusability of its data.
- In learning and development, DGT focused on stepping up **digital skills training** for staff and **investing in new professional profiles,** developing a programme for upskilling linguists with computational linguistic competences.
- Proposals for further efficiency gains and for **continued modernisation of the service** were developed by a DGT working group to feed into the broader corporate efficiencies and synergies work. The goal is to achieve an **optimal resources mix** between in-house capacity, outsourcing and machine translation over 2021-2027.
- DGT exceeded its 2019 target of 50% **female managers reaching 54%**.
- DGT **delivered the Commission report** to the Council on the Union institutions' progress towards the implementation of the gradual reduction of the **Irish** language derogation (COM(2019)318), adopted by the College on 4 July 2019.
- DGT hosted the **International Annual Meeting on Computer-Assisted Translation and Terminology** (JIAMCATT) 13-15 May in Luxembourg and co-hosted the International Annual Meeting on Language Arrangements, Documentation and Publications (IAMLADP) on 27-29 May in Brussels.

<u>Outreach activities</u>

- **Translating Europe Forum:** the 2019 forum 'Translation all around us – the added value of translation in business and society' brought together 500 participants.
- ***Juvenes Translatores***: the twelfth round of the contest was completed and the thirteenth round launched.
- **European Day of Languages** (26 September): DGT's field officers organised 139 events in the Member States reaching out to over 62,000 citizens.
- **European Masters in Translation network (EMT)**: translation study programmes from 81 universities in the EU and beyond are now part of the EMT network for 2019-2024.

b) Key Performance Indicators (KPIs)

Result indicators:

1. Customer satisfaction rate (Percentage of clients who express satisfaction with DGT's services)

Baseline	Target/Milestone	Latest known result as per Annual Activity Report
2013: 82.5%	2015: x ≥ 83% 2018: 84% - **Milestone SP** 2020: 85% - **Target SP**	2014: 83.0% 2015: 80.2% 2016: 86.0%[2]

2. Deadline compliance rate (Proportion of pages produced (all versions) within the deadline as a percentage of the total number of pages produced (all versions)

Baseline	Target/Milestone	Latest known result as per Annual Activity Report
2009: 95%	2011: 95.0% 2012: 95.0% 2013: ≥ 96.0% 2014: ≥ 95.0% 2015: ≥ 95.0% 2018: 97% **- Milestone SP** 2020: 99% - **Target SP**	2011: 97.9% 2012: 98 0% 2013: 97.3% 2014: 98.1% 2015: 98.5% 2016: 94.6%[3] 2017: 99.2% 2018: 99.4% 2019: 99.5%

3. Outsourcing rate

Proportion of pages translated externally as a percentage of the total number of translated pages delivered by DGT

Baseline	Target/Milestone	Latest known result as per Annual Activity Report
2015: 27%	2016: ≥ 29.0% 2018: 33% **- Milestone SP** 2020: 37% - **Target SP**	2016: 29.5% 2017: 30.6% 2018: 29.6% 2019: 31.5%[4]

4. Percentage of women in middle management

Baseline	Target/Milestone	Latest known result as per Annual Activity Report
2015: 44%	2018: 47% - **Milestone SP** 2019: 50% - **Target SP**	2016: 50% 2017: 52.6% 2018: 54% 2019: 54%

First female appointments in line with the 2019 target

	Target	Latest known result as per Annual Activity Report

2 Result of the customer satisfaction survey in 2016, the latest rate. DGT has decided not to conduct customer satisfaction surveys every year to avoid survey fatigue, and to give customers time to become familiar with the expanding range of DGT products and services, and take stock of any changes. Including new features which customers have asked for, like ePoetry, would make the survey more meaningful for both DGT and its customers, hence the next customer satisfaction survey is planned for 2020 once ePoetry is fully rolled out and known to customers.

3 Due to the launch of a new workflow system in DGT the deadline compliance rate deviated slightly from the normal value. This was a temporary phenomenon and not a downward trend.

4 No remediating measures are planned as outsourcing is demand-driven and the Strategic Plan 2016-2020 already recognised that the need to increase outsourcing would be calibrated according to the level of demand to ensure optimal use of resources.

	2019: 50%	2019: 54% (14 first time appointments)

c) Key conclusions on Financial management and Internal control (executive summary of section 2.1)

In accordance with the governance arrangements of the European Commission, Directorate-General for Translation (DGT) conducts its operations in compliance with the applicable laws and regulations, working in an open and transparent manner and meeting the expected high level of professional and ethical standards.

To ensure the achievement of policy and management objectives, the Commission has adopted a set of internal control principles, based on international good practice. The financial regulation requires that the organisational structure and the internal control systems used to implement the budget be set up in accordance with these principles. DGT has assessed its internal control systems during the reporting year and has concluded that the internal control system is present and functioning but some improvements are needed. Please refer to AAR 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; 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.

d) Provision of information to the Commissioner(s)

In the context of the regular meetings during the year between the DG 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 THE ACHIEVEMENT OF THE COMMISSION’S GENERAL OBJECTIVES AND DG'S SPECIFIC OBJECTIVES

General objective: **To help achieve the overall political objectives, the Commission will effectively and efficiently manage and safeguard assets and resources, and attract and develop the best talents**		
Impact indicator: Trust in the European Commission **Source of the data**: Standard Eurobarometer on Public Opinion in the European Union		
Baseline (EB 83 – Spring 2015)	**Latest known value** (EB 91 – Spring 2019)	**Target** (2020)
40% tend to trust	46% tend to trust	Increase
Impact indicator: Staff engagement index in the Commission **Source of the data**: European Commission		
Baseline (2014)	**Latest known value (provisional)** (2018)	**Target** (2020)
65.3%	74% (Commission average: 69%)	Increase

Specific objective 1: DGT meets the Commission's needs by delivering high-quality translation and editing services

In 2019, **DGT translated** 1,976,964 pages compared to 2,254,743 pages in 2018. The 12.3% decrease is down to the fact that demand in 2018 had been particularly high due to the files related to the Multiannual Financial Framework (MFF) and that 2019 was the last year of the Juncker Commission, with fewer initiatives proposed compared to other periods. The **deadline compliance rate** rose from 99.4% in 2018 to 99.5% in 2019. The **correction rate**, which measures translation quality based on the number of corrigenda and correcting acts adopted by the Commission to correct translation mistakes, was 0.31%, which is below the tolerance level of 0.5% defined in DGT's Strategic Plan. 31.5% of total production was outsourced, compared to 29.6% in 2018 (see Specific Objective 2).

DGT met 99.5% of all deadlines, exceeding the 2020 target of 99%.

The **main recurrent files** for translation were the General Report, the Draft Budget and the European Semester. Other **voluminous files** from 2019 included: Official Controls package (350 pages), Animal Health (800 pages) and Plant Health (300 pages) from DG SANTE; Accession of Solomon Islands to EPA Pacific States from DG TRADE (244 pages); the Social Statistics package from ESTAT (250 pages);the CAP Transitional Regulation and Flexibility Regulation from DG AGRI; and the Excessive Deficit Procedure documents from DG ECFIN. One of the main achievements in the second half of 2019 was the timely delivery of the **Commissioners-designate hearing** documents between 23 September and 6 October and 11 and 18 November, with 21,684 pages delivered. There were also a number of **politically sensitive files** from both the Juncker Commission and the von der Leyen Commission, for example Brexit-related documents, the Sibiu summit file and the Green Deal — part of the six political priorities of the new Commission.

DGT **edited** 32 out of 61 adopted **major initiatives** (52%), which is a similar share to 2018 (51%), but below the 2020 target (65%). In the final year of the last College’s mandate, relatively few new initiatives were put forward (by comparison, 166 new initiatives were adopted in 2018). Furthermore, of those initiatives that were adopted, most were urgent policy initiatives that were fast-tracked through inter-service consultation leaving little possibility for editing. Although major initiatives are the strategic priority, they are only part of the editing work DGT does. **Total editing production** in 2019 was in fact 8.5% higher (29,736 pages) than in 2018 and roughly 50% higher than in 2015 (19,978), the first full year of the Juncker Commission.

In 2019 DGT marked 10 years of its clear writing campaign

DGT **clear writing** activities continued with the total number of training sessions organised by the editing unit in 2019 rising to 88, reaching some 2,000 participants across the institutions (compared to 71 sessions and 1,800 participants in 2018). In 2019, DGT marked 10 years of the clear writing campaign with a range of activities, including the **Clear Writing for Europe conference** organised in December. This brought together clear writer practitioners from across the continent and many international organisations.

DGT participated for the first time in the **Workshop on Machine Translation**, a worldwide research conference that includes a competitive element. **eTranslation,** the Commission's neural machine translation service, competed with systems developed by academia and commercial players. DGT did well in all categories it competed in. A particular highlight was a second-place ranking on the topic of EU elections (French into German).

eTranslation delivered almost 95 million pages in 2019. The system is serving a **large and expanding user base,** with a variety of purposes. Popularity among EU staff and other individual users of the web page is growing, but these users submit occasional requests and do not have a significant impact on the overall total. Interinstitutional pre-processing for translators is another user base which is largely stable, though it fluctuates in line with the output of the translation services. Machine-to-machine connections by institutional or external services are the third large user base. New services connect with their own use cases and how many join (or leave) the service in any given year is unpredictable, as is the amount of translation they will request. The **target for 2020** was set assuming ambitious growth, but certain new services, such as text analysis of news items by the Joint Research Centre, made extremely heavy use of the system. Despite the unpredictability, eTranslation has to ensure that the system has the **capacity to handle** projected **growth** and the **flexibility** to react to large surges.

In November, the **memorandum of understanding** on the CEF Automated Translation Platform, initially signed between DG CNECT, DG DIGIT and DGT in 2016, was revised. It now includes DG SCIC and focusses on different language technologies, not only automated translation. The four DGs also started discussions on forming a **centre of excellence** in the language technologies domain.

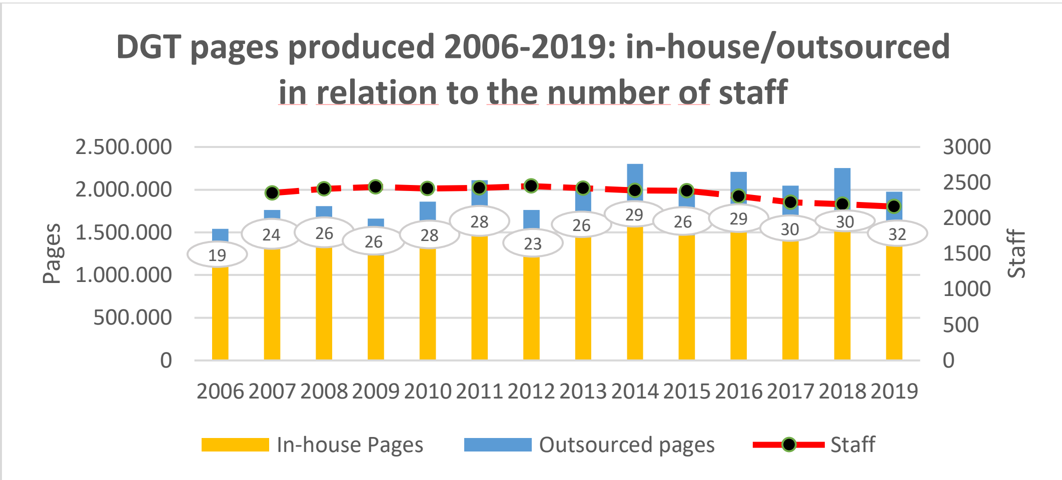
DG CNECT, DG DIGIT, DG SCIC and DGT to form a Centre of Excellence in language technologies

Quality management efforts focussed on arrangements to implement the tender specifications of the new TRAD19 outsourcing contracts, in particular by adapting DGT's evaluation system (new error typology, evaluation marks and definitions). Quality managers also worked on the quality aspects of linguistic data in the translation memory database Euramis (monitor and identify good practices on data labelling, sentence management and normative memory management in the departments) and the quality challenges posed by the integration of neural machine translation output in DGT's computer-assisted environment. They have also started developing a catalogue of training actions on quality-related aspects. In 2019, two staff forums (in Brussels and Luxembourg) were organised to confirm the key role of quality and quality management in the translation process and to exchange practices, experiences and concerns on quality.

Terminology coordination work, as set out in DGT's Terminology Framework, focused on ensuring the consistency of terminology in translations and on maintaining and feeding IATE, the interinstitutional terminology database. There was a 0.8% increase in the share of IATE entries having added value (definition, context and/or note). In absolute figures: out of about 6.3 million entries in IATE, over 1.8 million have added value, 63,620 more than at the end of 2018. This was achieved in spite of a slowdown of all IATE feeding and cleaning due to the full migration to a new terminology database in the first quarter of the year. As a partner in the interinstitutional IATE project, DGT contributed actively to the development and testing of the new terminology database IATE 2, which includes a number of improved features, like a more powerful search, an enhanced export function, a term recognition module with more filters and a more user-friendly and ergonomic interface.

In order to increase the terminological consistency and quality of translations, DGT stepped up efforts to make optimised use of terminology databases in the translation workflow by identifying, testing and developing the appropriate terminology tools.

Specific objective 2: DGT makes efficient use of its human and financial resources and manages fluctuating demand by increasing the level of outsourcing



With 1,976,964 pages translated in 2019, the last year of the Juncker Commission, DGT delivered on lower demand than 2018 (2,254,743 pages, including the MFF). At the same time, 2019 was a year of **systematic efforts to improve digital skills** in all language departments following the 2018 digital proficiency analysis — through targeted training and coaching — and of the linguistic and other **data inventory** as a first step to developing DGT´s data strategy.

Due to the lower overall production in 2019 compared to 2018, the volume of pages outsourced also decreased to 622,992 pages. This corresponds to an **outsourcing rate** of 31.5% (compared to 30% in 2018). Although the rate remains below the interim milestone for 2018 (33%), the Strategic Plan 2016-2020 recognised that the need to increase outsourcing would be calibrated according to the level of demand to ensure optimal use of resources.

Under its policy of **continuous quality scrutiny,** DGT discontinued contracts for 22 OMNIBUS-15 contractors, covering 32 language combinations.

A **new call for tender** for translation services (TRAD19) was launched in view of the expiry of all existing framework contracts and building on the positive experience with two pilot projects CASC and OMNI+. After the publication of the call for tender on 20 May and subsequent **information sessions** in all EU Member States, DGT received 672 bids from almost 190 tenderers. All 49 lots were covered. The tendering procedure is still ongoing. The tests had to be retaken due to technical issues.

Specific objective 3: DGT has the capacity to provide high-quality translation into Irish

DGT continued to work towards implementing a full Irish language regime. The main challenge in 2019 was to recruit a sufficient number of Irish speaking translators and assistants to cope with the third incremental increase due on 1 January 2020, which is expected to double the demand for Irish translation. DGT's efforts focused on filling the posts allocated to the Irish translation unit in 2019 by recruiting permanent officials from the EPSO/AD/361/18 reserve list and temporary staff from the temporary agent selection procedure launched in February. Although significant progress was made in 2019, DGT still has to achieve the **recruitment target for 2019/20** as set in DGT's Strategic Plan 2016-2020. DGT embarked on setting up a fully-fledged Irish language department, including a second unit, and looking at the possibility of hosting part of the department in Grange (Ireland) at the premises of DG SANTE.

On 4 July 2019 the College adopted the **Commission report** to the Council on the Union institutions' progress towards the implementation of the gradual reduction of the Irish language derogation (COM(2019)318). Work on translation into Irish of selected parts of the *acquis communautaire* intensified significantly in 2019 mainly due to the lower translation demand defined by the regulatory scope.

Specific objective 4: DGT has a modular state-of-the-art computer assisted translation environment to support quality and efficiency in the translation process

In December, DGT's Director-General signed a new framework contract with SDL on behalf of other interinstitutional partners following a thorough evaluation[5] of the five CAT tool offers received under the **call for tenders** for an interinstitutional **computer assisted translation (CAT) tool** launched in 2018. The evaluation showed that SDL Trados was the most mature and complete tool. Under the new contract, it will also be possible to use SDL Trados server components. This will make it easier to engage in collaborative work and to share translation memories and term bases in real time, including for SECure E-Mail (SECEM) documents.

The **migration to Windows 10** was completed in October. The majority of non-Windows 10 compatible laptops were replaced and DGT upgraded its fleet of laptops.[6] Prior to the migration, DGT made and tested the necessary adaptations in its IT applications to ensure that the computer assisted translation environment would run flawlessly under Windows 10. The migration was completed without any problems or disruptions of the service.

Following an **assessment of** the impact of **neural machine translation** in mid-June, the IT Steering Committee decided in July to phase out the use of statistical machine translation engines in DGT. This assessment and further internal research have shown that machine translation provides a clear efficiency boost for translators, making eTranslation an indispensable component of DGT's translation environment.

[5] An interinstitutional evaluation committee, 79 testers (mainly translators) and a group of IT experts looked at 138 technical requirements.

[6] For translation staff, laptops dating from 2015 or earlier were replaced by new 16 GB RAM laptops; laptops dating from 2016 or later with 4 GB or 8 GB RAM upgraded to 16 GB, with extra memory added by DG DIGIT.

The first phase of the **automation of the outsourcing workflow** was completed and rolled out in Q2 2019 as planned. This module automatically creates translation packages for external contractors based on a defined set of rules. It facilitates the preparatory work related to outsourcing in the language departments.

The **rollout of ePoetry** had to be postponed as user tests showed some shortcomings in the application. The beginning of deployment for customer DGs is now planned for Q2 2020. **Automation of the workflow for marked and sensitive documents** is ready and available to users.

Specific objective 5: DGT creates synergies in interinstitutional translation by cooperating with its partners and by jointly developing IT tools

In the context of inter-institutional cooperation, DGT contributed significantly to projects and initiatives coordinated by the interinstitutional Executive Committee for Translation.

The Committee:

- approved a new comprehensive agreement providing for the access, management, obligations and **financing of eTranslation**. This new agreement became necessary due to the switch from MT@EC (statistical machine translation) to eTranslation (neural machine translation) and the concomitant shift to cloud hosting of the translation engines. The new agreement will come into effect as of 1 January 2021.
- extended the mandate of the Ordinary Legislative Procedure (OLP) Cooperation Group with a view to promoting and facilitating centrally coordinated **work-sharing** between the Council, the Parliament and the Commission and to improving **terminology cooperation** and communication on OLP files.
- endorsed a **new competency profile for translators** and a proposal to review the selection procedure in translator competitions.

The Interinstitutional Committee for Translation and Interpretation discussed a concept paper on **inclusive communication**, held a debate on **artificial intelligence** and its impact on the language professions and established an interinstitutional and interservice (translation and interpretation services) task force on **speech recognition** to exchange information on speech recognition data and projects.

In 2019, **130 interinstitutional training sessions** were organised. This figure is higher than in 2018 (116), but it is still significantly below the 2020 target (300). This target is challenging because of the demand-driven nature of training and due to budgetary constraints that reduced language departments' ability to organise many training sessions at interinstitutional level.

DGT hosted the International Annual Meeting on Computer-Assisted Translation and Terminology (**JIAMCATT**) on 13-15 May in Luxembourg, and co-hosted — with DG SCIC and the language services of the European Parliament, Council and Court of Justice — the International Annual Meeting on Language Arrangements, Documentation and Publications (**IAMLADP**) on 27-29 May in Brussels. Some 170 participants from almost 60 international organisations participated.

DGT continued to manage a number of **tools** (eTranslation/MT@EC, Euramis, Quest, DocFinder and the Common Communication Solution[7]) that are shared across EU institutions and services. DGT **language technology experts** were regularly invited to speak at events organised by other institutions.

[7] The other institutions suspended their developments on the internal modules for the communication solution in 2018.

DGT is the partner DG of the **Translation Centre**. The Centre's primary mission is to provide translations and related language services to a large number of EU agencies and bodies in line with agreed quality criteria, deadlines and prices. By doing so, it implements effective multilingualism in the EU agencies and bodies, complementing the work done by DGT for the European Commission. The Translation Centre is also in charge of the development, maintenance and operation of the inter-institutional terminology database IATE, used by translators in DGT and in the other EU institutions, and open to the public worldwide.

Specific objective 6: DGT promotes the role of translation and professional cooperation through outreach work

The **sixth** edition of the **Translating Europe Forum** ('Translation all around us – the added value of translation in business and society') brought together **500 participants** in Brussels on 7-8 November. The sessions looked at what translation entails in specific sectors (such as healthcare, entertainment, climate protection and sustainability and tourism) and at the latest advancements in language technologies. **Commissioner Oettinger** highlighted the importance of translation for democracy. The conference again attracted considerable interest within the translation community with more than **4,000 unique viewers** following the web-streaming from 48 countries. The **satisfaction rate** reached **99.5%.**

Furthermore, a total of **48 Translating Europe workshops** in 24 Member States covered various topics relevant to the local translation markets, including language technologies and translation tools.

Following the call for membership of the next **European Masters in Translation network** (2019-2024), launched in September 2018, the list of new members was published on Europa in June. Translation study programmes from 81 universities in the EU and beyond are now part of the network. This time universities had to demonstrate in particular how far they cover the main areas of translation competence as defined in the new **EMT Competence Framework**[8] published in 2018. The framework sets out the competences translators need in order to work successfully in today's market. The new network held its first meeting in Brussels in October.

Under the **Visiting Translator Scheme,** 43 missions took place in 2019. DGT translators exchanged good practices by visiting institutional translation services, such as the language service of the World Meteorological Organisation in Geneva or relevant services of German ministries; promoted eTranslation by visiting various institutions in Estonia; and explored different freelance markets (e.g. Bulgaria and Finland) to prepare the call for tender for translation services. Many visits dealt with important terminology fields, such as the common agricultural policy (Slovakia), aviation (Italy) and finances (Austria).

Four **Presidency Days** events were organised to mark the Romanian and Finnish presidencies, with the participation of external speakers.

The number of followers of all **DGT's social media channels** continued to grow, especially in the context of the *Juvenes Translatores* translation contest.

[8] https://ec.europa.eu/info/sites/info/files/emt_competence_fwk_2017_en_web.pdf

2. ORGANISATIONAL MANAGEMENT AND INTERNAL CONTROL

This section explains *how* DGT delivered the achievements described in the previous section. It is divided into two subsections.

The first subsection reports the control results and other relevant information that supports management's assurance on the achievement of the financial management and internal control objectives[9]. It includes any additional information necessary to establish that the available evidence is reliable, complete and comprehensive. It covers all activities, programmes and management modes relevant to the DG.

The second subsection deals with the other components of organisational management: human resources, information management and external communication.

2.1 Financial management and internal control

Assurance is an objective examination of evidence for the purpose of providing an assessment of the effectiveness of risk management, control and governance processes.

This examination is carried out by management, who monitors the functioning of the internal control systems on a continuous basis, and by internal and external auditors. The results are explicitly documented and reported to the Director-General. The reports produced are:

- weekly reports on demand management and outsourcing;
- monthly reports on budget execution and the management information scoreboard highlighting key data in areas in which action may be needed;
- twice-yearly reports by authorising officers by sub delegation, including the results of internal control monitoring at DG level;
- the contribution by the director in charge of risk management and internal control, including the results of internal control monitoring at the DG level;
- reports on recorded exceptions, non-compliance events and any cases of 'confirmation of instructions' (Art 92.3 FR);
- reports on audit results;
- the limited conclusion of the internal auditor on the state of control, and the observations and recommendations reported by the Internal Audit Service.

These reports result from a systematic analysis of the evidence available. This approach provides sufficient guarantees as to the completeness and reliability of the information reported and results in a complete coverage of the budget delegated to the Director-General of DGT.

This section is for reporting the control results and other relevant elements that support management's assurance. It is structured into (a) Control results, (b) Audit observations and recommendations, (c) Effectiveness of internal control systems, and resulting in (d)

[9] Art 36.2 FR: a) effectiveness, efficiency and economy of operations; b) reliability of reporting; c) safeguarding of assets and information; d) prevention, detection, correction and follow-up of fraud and irregularities; and e) adequate management of risks relating to the legality and regularity of underlying transactions

Conclusions on the assurance.

2.1.1 Control results

This section is for reporting and assessing the elements identified by management which support the assurance on the achievement of the internal control objectives[10]. The DG's assurance building and materiality criteria are outlined in AAR Annex 4. Annex 5 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.

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

In 2019, DGT managed expenditure totalling €26.15 million[11] (including funds co-delegated by other DGs), of which it was directly responsible for €16.94 million (i.e. excluding appropriations for external personnel).

Funds co-delegated by other DGs mainly cover external translation costs (€2.32 million – actually committed[12]). DG EAC co-delegates approximately €0.6 million for the organisation of external communication activities under Key Action 3 related to multilingualism (2019 Annual Work Programme - Erasmus+, Commission Decision of 11 October 2018 [C(2018)6572]).

Adequate internal control principles are applied taking into account the low-risk environment of the DG. The same level of control is applied, irrespective of the origin of the funds managed (funds received in co-delegation or own funds).

DGT has a partially decentralised financial circuit in place for commitments, under which the level of controls depends on the estimated risk of the transactions.

Commitments by procurement types (legal commitments)	Budget (K €)	% of total budget	Number of transactions	% of total number of transactions
Type 1: DGT FWC & NP** - external translation including funds co-delegated by other DGs	11,826	70%	14,952	80%
Type 2: DIGIT FWC (IT) + other IT expenditure	2,914	17%	48	0.2%
Type 3: Low value NP, AMI, FWC (from other DGs) (conferences and events, library expenditure, terminology)	1,377	8%	478	3%
Type 4: Partially managed by PMO (missions)	825	5%	3,269	17%
Total	**16,941****		**18,747**	

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

[10] 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.*

[11] Amount of legal commitments made during the year.

[12] DGT reported on provision of services in 2019 (charge-back) to the Corporate Management Board (Ares(2020)1125373). In the body of the AAR we mention €2.32 million corresponding to the budget of commitments made during the year, whereas in the charge-back document we mention €2.7 million corresponding to the amount of appropriations received at the beginning of the year. In the body of the AAR we mention €2.32 million corresponding to the budget of *commitments* made during the year, whereas in the charge-back document we mention €2.7 million corresponding to the amount of *appropriations* received at the beginning of the year.

DGT has a fully centralised financial circuit for payments, in which 100% of payments are controlled for legality and regularity, for all budget lines.

As DGT does not manage programmes and grants there are no *ex post* controls.

Any errors identified are corrected before signature of the contract or authorisation of payment. The residual error rate is therefore 0%.

Key control indicators

Indicator	2016	2017	2018	2019
Budget execution rate (after mid-term adjustments)	99.7%	99.9%	99.9%	**98.8%**
Payments made within the contractual period (%)	96.8%	98.2%	98.3%	**97.5%**
Absorption of budgetary backlog (RAL) (%)	92%	96%	96%	**97%**
Average delivery timing for monthly execution report	8 days	8 days	8 days	**8 days**
Number of financial exceptions handled	8	7	4	**8***
Total value of exceptions (€)	€9,723	€16,470	€65,756	**€2,903**
Audit recommendations implemented within deadlines	100%	100%	100%	**100%**
Audit observations that might give rise to reservations	0	0	0	**0**
Cases referred to OLAF over the past three years	0	0	0	**0**

Sources: DGT- Budget execution report and DGT internal statistics
** Including one exception with no financial value*

Additional reporting required by the 2018 Financial Regulation:

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

1. Effectiveness = the control results and benefits

- ***Legality and regularity of the transactions***

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

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 total expenditure, excluding external personnel (see Annex 4: Materiality criteria).

DGT's **control strategy** is based on 100% *ex ante* controls, i.e. before contracts are signed or payments made. This enables potential irregularities to be identified beforehand, which also explains the low error rate and the low number of exceptions reported.

An evaluation of the update of financial circuits in DGT, which was implemented in 2018, was completed. It concluded that the objectives set in December 2017 had been effectively met:

- getting a harmonised approach across directorates/language departments and budget lines;
- having the shortest circuit possible in terms of numbers of actors involved between initiation and authorisation of the expense;
- involving only the actors directly responsible for the operational performance of the activities;
- keeping controls (type and number) and risks of the transactions relevant and proportional;
- making sure all financial actors have the appropriate knowledge or have followed the appropriate training.

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

- For the **management of outsourced translations** (70% of DGT 2019 budget): open calls for tender are launched every four years, leading to the conclusion of framework contracts for a number of selected language combinations. All procedures are documented. Where a language combination is not covered by a framework contract or in cases where no contractor replies to a publication, then the contract (low or very-low value) is awarded by negotiated procedure.
  The financial and legal units' *ex ante* controls consist of reviewing the tender documents before the launch of the tender, and the future framework contracts before the award decisions.
  DGT launched a new call for tenders in May 2019 (see details under point 1, Specific Objective 2 above, and under point 3, Economy = the cost of controls below).

Effectiveness indicators – procurement*	
Number of lots (language combinations) where a sufficient number of offers are received	100%

Sources: DGT internal statistics
** For call for tender launched in 2019*

The finance unit reviews all invoices before authorising payments. All delivered translations are quality controlled by internal staff before issuing invoices in the payment circuit.

Effectiveness indicators – financial transactions	
% error rate prevented	100%
Amount of liquidated damages (for bad quality)	€66,000
Amount of liquidated damages (for late delivery)	€3,000

Percentage of translations rated good or very good by the evaluators	92.4%

Sources: DGT internal statistics

- For **IT contracts** (17% of DGT 2019 budget), DGT uses framework contracts provided by DG DIGIT. The individual draft contracts are reviewed by the finance unit and by DG DIGIT through the 'paraph' procedure. Final contracts, timesheets and invoices are checked before the finance unit authorises payments.

  In 2019, following an open call for tender launched the previous year, DGT evaluated the bids received and awarded the contract for an interinstitutional framework contract for the new computer assisted translation environment.

Effectiveness indicators - procurement	
Sufficient number of offers are received	Y
Numbers of valid complaints or litigation cases filed	0
Amount of procurements successfully challenged during standstill period	0

Sources: DGT internal statistics

Effectiveness indicators – financial transactions	
% error rate prevented	100%
Number of control failures	0
Amount of liquidated damages	0

Sources: DGT internal statistics

- **All other procurements** (8% of DGT 2019 budget) concern mainly low to very low-value negotiated procedures, and to a lesser degree, calls for expression of interest, specific contracts under framework contracts of other DGs. The minimum competition requirements set out in the Financial Regulation are strictly observed. All tender documents are reviewed by DGT's finance unit before the contract is signed. The final contracts, delivery reports and invoices are checked by the finance unit before authorising payment.

- All **mission orders and costs declarations** (5% of DGT 2019 budget) are verified by DGT's finance unit before approval by the authorising officer.

Following a cost benefit analysis, and considering the automation of transactions for the main part of the budget, the intensive use of framework contracts, the structure of the financial circuits and the results of the *ex ante* controls, **no *ex post* controls** are performed on procurement.

The total **number of exceptions** in 2019 was 8 out of a total of 19,000 transactions. They represented €2,887 out of a total of €16,942,069 (0.02%). One exception did not concern a financial transaction, it concerned the decision not to use a corporate tool in a call for tender, as there were concerns about its reliability to accommodate the high number of lots covered by the call.
None of the exceptions resulted in undue payments or cost to the budget.

In the context of the protection of the EU budget, the DGs' **estimated overall risk at payment, estimated future corrections and risk at closure** are consolidated at Commission level.

DGT's data is shown in the table below and its accompanying notes.

The estimated overall risk *at payment* for 2019 expenditure is €84,000. This is the authorising officer by delegation's best, conservative estimate of the amount of *relevant expenditure* during the year (€16.93 million) that might not be in conformity with the contractual and regulatory provisions applicable at the time the payment was made, taking into account the average error rate (AER) of 0.5% suggested by DG BUDG for low-risk expenditure where the error rate is close to zero (see footnote (6) of the table below).

As explained above, since DGT has a fully centralised financial circuit for payments, in which 100% of payments are controlled for all budget lines, this expenditure is not subsequently subject to *ex post* controls. The conservatively estimated future corrections for 2019 expenditure are therefore also €84,000. This is the amount of errors that the DG conservatively estimates will be identified and corrected by controls planned to be carried out in succeeding years.
The difference between those two amounts leads to the estimated overall risk *at closure* for the 2019 expenditure of zero.

These figures are stable over the years, as the limited changes applied by DGT in its control strategy after risk analysis are going in the direction of tightening controls where they are most needed, and reducing them where they become less necessary in view of automated processes implemented.

Estimated overall risk at closure

DGT	"payments made" (FY; m€)	*minus* new prefinancing [*plus* retentions made*] (in FY; m€)	*plus* cleared prefinancing [*minus* retentions released* and deductions of expenditure made by MS] (in FY; m€)	**= "relevant expenditure" (for the FY; m€)**	Average Error Rate (*weighted* **AER**; %)	estimated overall risk *at payment* (FY; m€)	Average Recoveries and Corrections (***adjusted*** **ARC**; %)	estimated future corrections [and deductions] (for FY; m€)	**estimated overall risk *at closure* (m€)**
(1)	*(2)*	*(3)*	*(4)*	*(5)*	*(6)*	*(7)*	*(8)*	*(9)*	*(10)*
Overall, total	16.93	0	0	16.93	0.5%	0.08	0.5%	0.08	0

(1) Not differentiated DGT manages administrative expenditure only, under the direct centralised management mode

(2) Payments made or equivalent, e.g. expenditure registered in the Commission's accounting system, accepted expenditure or cleared pre-financing. In any case, this means after the preventive (ex-ante) control measures have already been implemented earlier in the cycle.
In all cases of Co-Delegations (Internal Rules Article 3), "payments made" are covered by the Delegated DGs. For Cross-SubDelegations (Internal Rules Article 12), they remain with the Delegating DGs.

(3) N/A for DGT

(4) N/A for DGT

(5) The amount is the same as under (2) as DGT does not operate any pre-financing.

(6) For low-risk types of expenditure, where there are indications that the equivalent error rate might be close to 'zero' (*e.g. administrative expenditure, operating subsidies to agencies*), it is nevertheless recommended that 0.5% be used as a conservative estimate.

(8) The AOD has replaced this historic average (0%) to 0.5% for the same reasons as under (6).

- ***Fraud prevention, detection and correction***

DGT has developed and implemented its own anti-fraud strategy since 2014, on the basis of the methodology provided by OLAF. It was last updated in 2016, after a comprehensive risk and fraud assessment, based on DGT's Strategic Plan 2016-2020.

DGT is a low-risk DG with a mature business process. As there were no changes to policies, organisation or procedures there was no revision of the anti-fraud strategy in 2019. The next revision is planned in 2020, and will be based on DGT's Strategic Plan 2020-2024.

Fraud risks are nevertheless reviewed each year during the process of compiling the management plan. In addition, the bi-annual reports of management to the Director-General of DGT, which feed into the mid-term progress review and the annual report, are analysed by the internal control officer under several aspects, including possible risk of fraud. If need be, the risk register and the anti-fraud strategy are updated.

DGT's anti-fraud strategy outlines **two main risks**:

The **first** concerns the **handling of sensitive, marked or classified information**, where no further action is recommended, provided security measures in place are maintained at their current level. The workflow on how to handle sensitive documents is updated when necessary and is available to all staff. RESTREINT UE/RESTRICTED EU documents are handled exclusively within the RUE environment, in line with the rules of the Security Directorate (translation of such documents is done in supervised secure rooms, one in Brussels and one in Luxembourg).

No case of leak or misuse of sensitive information has been reported.

The **second** concerns **financial transactions**, for which three actions are recommended:

- Continuous training of all staff dealing regularly with finances in the DG;
- Organisation of specific expenditure lifecycle courses for staff dealing occasionally with finances;
- Update of the documentation on procedures and processes on DGTnet.

These actions are ongoing and implemented on an *ad hoc* basis:

- In 2019, the finance unit mentored five newly appointed field officers and two colleagues from the communication unit in financial matters.
- The finance unit was present in January 2019 at the general meeting of field officers where clarifications about financial procedures were provided.
- One new colleague joined the unit in 2019 – she followed all training necessary to perform her job (both on-site from colleagues, and by registering for the courses offered at corporate level).
- Update of documentation on DGTnet each time there is a change to a procedure.

The controls in place intended to prevent and detect fraud are essentially similar to those designed to ensure the legality and regularity of transactions and quality of service. DGT controls 100% of financial transactions to ensure their legality and regularity.

In the last 10 years, DGT has not reported any cases of fraud to OLAF nor has OLAF investigated any misuse of DGT budget.

- ***Other control objectives: safeguarding of assets and information, reliability of reporting***

DGT-managed assets (other than IT intangible assets) are dictionaries or encyclopaedias when their cost exceeds thresholds. This is only a very small part of our library acquisitions. Orders are made based on the end-user requests according to 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.

2. *Efficiency = the Time-to-… indicators and other efficiency indicators*

The time-to-pay indicator (Art. 92.1 FR) for 2019 is 97.5% of payments made within the deadline, which is slightly lower than in 2018 (98.3%).

DGT has a fully centralised financial circuit for payments and deals with a high volume of very low-value transactions. Part of the controls are automated (e.g. payments on the external translation budget line). Daily and monthly reports monitoring the invoice workflow are extracted from the finance database.

At the end of 2019, the finance unit nominated a person to follow-up pending invoices. Analysis revealed a budget line where most delays occurred: reminders have been issued to all concerned, and a more efficient workflow will be studied in early 2020.

	2015	2016	2017	2018	2019
Time-to-pay	97.10%	96.87%	98.02%	98.34%	97.49%

Source: SAP

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

3. *Economy = the cost of controls*

The corporate methodology for the estimation, assessment and reporting on the cost-effectiveness of controls was revisited in September 2018 and applied for the first time in the 2018 annual reporting. Comparison over time is therefore limited. There has not been any substantial change in the DG's control strategy.

DGT estimates the cost of control for the management of the external translation and IT budgets, which correspond to 87% of its appropriations (commitments).

Concerning the **external translation** budget lines, the overall cost of control is estimated at 31%. The breakdown is as follows:

Controls linked to 'financial verification' account for **9%** (same as in 2018). This is explained by the very high number of very low value procurements (around 15,000 transactions). 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.

Parts of the controls are linked to elements that have an influence on the legality and regularity of the transactions and on the price paid to the contractor (e.g. page counting, publication of the tender, monitoring deadlines, evaluation of the returned product). Equally important are the controls performed by operational agents before documents to be translated are sent to the contractors (correct alignments, format of translation memories, reference documents, etc.) to ensure the contractors benefit from all elements needed to perform their job properly.

Another element to be taken into account is the cost of development and maintenance of the in-house IT system through which the bulk of financial transactions are processed. Without this tool, it would be impossible to manage the 15,000 transactions at reasonable cost and within acceptable deadlines. For example, in 2019 around 6,000 invoices received were automatically registered in the Commission accounting system. An increased number of controls integrated in the IT tool enabled better targeted financial verification and payment generation in the course of 2019. The actual savings cannot be quantified yet, as simplifications were introduced only in the last quarter of 2019.

Controls linked to the evaluation of outsourced translation once it is returned to DGT (quality assessment) account for **22%** (17% in 2018). As explained above, 100% of translations returned by the contractors are evaluated. Evaluation is a contractual obligation, the purpose of which is to examine whether DGT has received the service it requested. Confirmation of this enables DGT to pay for the outsourced service. Since outsourcing is based on multiple framework contracts with dynamic ranking (OMNI-15), the evaluation marks are taken into account for a regular update of ranking of contractors on a given list. This quality evaluation is performed on the one hand to deliver the "certified correct" and to calculate possible liquidated damage should the evaluation be rated insufficient. On the other hand, quality evaluation is a control made in order to mitigate the risk of reputational damage that the Commission would incur should it deliver bad quality documents. When translations are returned, they are revised/reviewed internally in line with DGT Translation Quality Guidelines before being sent to the requesting service.

The charge-back procedure has no influence on the level of control performed: irrespective of the funds used (co-delegated or own funds), the level of control is identical.

In terms of economies, the tender specifications of the new call for tender launched in 2019 (TRAD-19) are based on the experience gained from the pilot project CASC-17. Economies are expected at two levels, in the mid- to long term:

- reduced work linked to the publication of the tenders for each assignment and the monitoring of the deadlines;
- reduced costs linked to evaluation, due to the expected increased quality of delivered translation in the longer term.

For the management of the **IT budget**, where there is an extensive use of DG DIGIT framework contracts, the overall cost of control in DGT is estimated at 3%, slightly lower than last year (4%). This low cost of control is explained by the fact that the costs of procurement are shared between DGs and are lighter for DGT, who benefits from the controls performed beforehand by DG DIGIT. Our control strategy is adapted to the risk incurred.

See table Y in annex 10 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 under point 3, DGT has a small annual budget (€16.94 million), and a very high number of low and very low value transactions (19,000 – for all budget lines). Although procurement rules are simplified for such transactions, there is a minimum number of controls that need to be carried out for each transaction in order to comply with the high regulatory requirements for procurement. 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. So fixed costs are significant and it is not possible to achieve further economies of scale.

Concerning external translations, controls not only concern the legality and regularity of the transactions but also address the quality of translations delivered. The cost of control in this field is based on two factors which have to be taken in to account. First, evaluation is a contractual obligation, the purpose of which is to examine whether DGT has received the service it requested, and confirmation of this enables DGT to pay for the outsourced service. Second, DGT must verify the quality of the products to mitigate the risk of the reputational damages that the Commission could incur should it not deliver high quality texts in all languages. Note that costs related to outsourcing are expected to be reduced in the mid- to longer term with the implementation of the new call for tender TRAD-19.

The control strategy in place in DGT remained stable during the reporting year and it will be maintained. As shown by the indicators listed, it ensures low error rates and fast payment, the legality and regularity of the procedures, and all procurements satisfy the needs they address.

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 included below, 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. Details are available in Annex 10, point 1.1.

In 2018, **the IAS** carried out a **multi-DG audit on the connecting Europe facility (CEF)**, including DGT. Two recommendations were issued (rated important[13]), both were implemented in 2019 within the deadline.

In 2019, **the IAS** conducted a **limited review** in DGT, to **assess the implementation of the new internal control framework**. It focused on the annual overall assessment process. One recommendation was issued (rated important) and it was accepted by DGT.

In 2019 **DG BUDG** carried out an evaluation of DGT's **local financial systems** to determine whether the internal control systems produce sufficiently accurate, complete and timely information to prepare the annual accounts and produce reliable reporting. Four recommendations were issued (rated important) and will be implemented in 2020.

DGT has no new or overdue critical or very important IAS audit recommendations, and was not subject to any audit from the ECA.

Based on the work undertaken by the IAS in 2017-2019 in DGT (reported above) 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**[14].

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 carried out the assessment of the effectiveness of its internal control system following the methodology established in the Implementation Guide of the Internal Control Framework of the Commission.

While drawing up DGT's 2019 Management Plan the internal control monitoring criteria were set, including baseline and target values. These criteria were

---

[13] IAS recommandations scale: important – very important – critical.
[14] Ares(2020)931755

assessed at the end of the year, and they constitute one of the sources used to assess the strengths and deficiencies of the internal control system in DGT.

The evidence required to support the assessment was gathered from various sources: management knowledge from daily operations, results of key controls, staff survey, register of exceptions, analysis of internal control weaknesses or control failures recorded during the year, risk assessment, relevant audit results, and internal sources.

Following the recommendation of the limited review performed by the IAS in 2019 (see point 2.1.2 above), a working group including representatives of all Directorates was set up to analyse all sources of strengths and deficiencies. Particular attention was drawn to the need to use all available sources and to link them to all affected principles. The templates provided by DG BUDG were used to guide the group through the assessment. A detailed report was sent to the director in charge of risk management and internal control, presenting the conclusion of the assessment, which was then shared with the Director-General.

Concerning the control environment, principle 1 is present and functioning in view of policies applied in DGT, part of the results in the staff survey and general awareness in place. However, there is room for improvement concerning a weakness identified in the staff survey on hostile behaviour. An action plan is currently being implemented; therefore the principle is considered functioning well.

Concerning the control activities, principle 10 (and principle 7 on risk assessment), DGT has several documents on control strategies (financial/operational) and has many reporting tools and indicators showing that controls are in place and functioning well, yet it needs to be documented in an overall control strategy document.

Concerning information and communication, principle 14, the principle is present and functioning, however two areas where communication could be improved have been identified in the follow-up to the 2018 Staff Survey - these are included in the action plan and are being implemented (links with Principle 6: guidance on missions/objectives).

Conclusion:

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 well overall**, but some **improvements are needed** as minor deficiencies were identified as explained above.

The **improvements and/or remedial measures envisaged** are:

- Moving forward in the implementation of the action plan established in the follow-up to the results of the 2018 Staff Survey

- Drafting a control strategy document encompassing all control strategies already in place in DGT, and

- Updating the analysis of sensitive functions in DGT.

2.1.4 Conclusions on the assurance

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

The information reported in Section 2.1 stems from the results of management and auditor monitoring based on robust indicators contained in the reports listed. These reports result from a systematic analysis of the evidence available. This approach provides sufficient guarantees as to the completeness and reliability of the information reported and results in a comprehensive coverage of the budget delegated to the Director-General of DGT.

No weaknesses were identified in the reporting period that give rise to reservations.

DGT management carefully considered DGT's overall performance and control and supervisory activity in 2019 and found no significant (repeated) or residual errors.

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 Director-General of DGT, will assess the Centre's 2019 annual consolidated activity report by mid-June 2020.

Overall Conclusion

In conclusion, DGT 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.

2.1.5 Declaration of Assurance

Please see next page.

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[15].

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, 31March 2020

(e-signed)

Rytis MARTIKONIS

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

2.2 Other organisational management dimensions

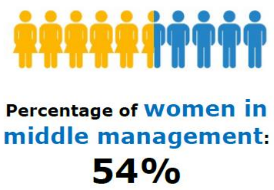
Examples of initiatives to improve economy and efficiency

1. DGT has started the process of automating its translation outsourcing workflow with the aim of improving the efficiency of handling documents and speeding up the process.
2. The systematic application of pre-processing to outsourced documents, fulfilling commonly agreed criteria, leads to savings in the outsourcing budget and improves the quality of external translations. In budgetary terms, savings are estimated at around **€2.8 million for 2019**.
3. The systematic inclusion of certain document types in Annex 8B of the service-level agreements on documents to be outsourced and charged back to the DGs allows DGT to reduce its outsourcing budget by almost **€2.5 million a year**. This amount is deducted in the calculation of the budget requested by DGT to the budgetary authority.

2.2.1 Human resource management

Staffing, post allocation and recruitment

In 2019, 50 officials, 24 temporary agents and 33 contractual agents were recruited, while 105 officials, 15 temporary agents and 41 contractual agents left DGT. In the framework of the **synergies and efficiencies** work, 2 AST/SC posts were placed at the disposal of OIL, to be transferred on 1 January 2020.



With **44/81 women in middle management**, DGT exceeded its 2019 target of 50% female managers (54%). DGT continued to work towards its target of 16 first-time appointments of women to middle management positions by 1 November 2019, appointing and/or nominating 14 women to their first middle management position.

DGT welcomed the highest number (91) of Blue Book trainees in the Commission and offered 92 training placements. General rules and workflow for training placements in DGT were updated in March[16].

Working conditions and well-being

DGT Brussels **Sports Day** was organised in July at the European School in Laeken.

Following the **Commission's 2018 Staff Survey**, which included a section of DGT-specific questions, a working group was created to draw up a development plan to be submitted to DG HR. The development plan was discussed and approved in the Directors' meeting in July, and includes **follow-up measures** to remedy the areas of concern expressed by staff in the survey. In June, the working group held three staff fora in Brussels and Luxembourg to share the results of the survey with staff and management.

[16] Ares(2019)1445015

Following the report and recommendations of the working group 'DGT's Workplace of the Future' which during 2018 reflected on the **future physical work environment** in Luxembourg (JMO2) and Brussels (post rue de Genève buildings), a pilot project on installing a **modular project space** in Brussels (G-6) was finalised in cooperation with the OIB.

Learning and development

Average training hours of courses attended	• DGT: 44.46 • Commission: 36.79
Average number of courses attended per person	• DGT: 7.95 • Commission: 5.48

Evolution of the number of training hours of DGT staff recorded in the domain of digital proficiency: 10,700 in 2017; 13,100 in 2018; 19,400 in 2019

Committed to being a **learning organisation**, also in 2019 DGT had a large L&D range on offer. As in previous years, this was based on a learning needs analysis involving line management and staff. The focus was on **thematic training**, expanding **digital competence**, **building teams** and developing **management skills**, domains that had been prioritized by senior management. Also in-house language learning in the interest of the service remains important. 2019 was also a year of follow-up to the digital skills assessment of 2018, with training and coaching ongoing in the departments to bring everyone´s skills up to a **standard digital proficiency**.

In terms of format, **e-learning** and blended learning represented an increasing share of DGT's offer, complementing the traditional classroom and workshop formats.

Development-related outreach and exchanges with external stakeholders continued: besides universities and public administrations, the successful **Visiting Translator Scheme** specifically targeted technology-related projects in 2019.

A **forward-looking analysis** of the impact of Learning and Development (L&D) on translators' work in DGT was carried out. L&D actions (take-up, impact and outcome) were analysed in the broad sense of DGT knowledge management and capacity building, as well as in the sense of individual talent and career development. The study showed that DGT staff not only appreciated the L&D offer but also considered it very important, not only for staying up-to-date but also as a **source of confidence at work and motivation**. Following up on the study results, attention will be spent on ways to better reconcile work and training, to find a good balance between planning and flexibility and to streamline the communication about what is available.

The range of **learning and development and knowledge-sharing activities** is summarised in the related table in Annex 2.

Modernisation

Following the Commission Communication on Modernising the European Commission – Lessons from the Synergies and Efficiencies Initiative[17], an internal

[17] https://myintracomm.ec.europa.eu/synergies-efficiencies/Documents/COMM_Synergies_Efficiencies.pdf

working group on shaping the future of translation was set up to make **further proposals for modernisation and efficiency gains** in translation. In addition, two staff fora led by the working group's co-chairs were organised to address the concerns of DGT staff and collect their views and ideas.

Within the context of modernisation of translation, and as part of DGT's response to the acceleration of technological developments and the widespread use of artificial intelligence in the language service industry, DGT launched an **upskilling pilot project** for 2020. The aim of the pilot project is to upskill a selection of DGT linguists in the area of computational linguistics.

Internal communication

DGT continued to promote two-way communication between staff and management to enhance trust, mutual understanding and recognition of each other's work. Activities focused on accompanying staff through the changes affecting the translation profession via staff forums on the future of translation, on quality and on the follow-up to the 2018 staff survey. As to the latter an action plan was adopted and communicated internally. Efforts went also in further streamlining and revising content of DGT's local intranet.

The annual DGT Staff Meeting was organised in Brussels and Luxembourg in March. The internal video produced for the staff meeting received the IC award for best internal video in June.

Concerning the internal communication within the Commission, an event aimed at giving visibility to DGT services took place in Berlaymont on the European Day of Languages, showcasing translation, editing and clear writing, the EU terminology database IATE and DGT's machine translation system eTranslation. A campaign to promote eTranslation was designed and rolled out. It included posters, video, visuals, articles, more prominent link on the Commission's intranet pages and a roadshow in the other directorates-general of the Commission.

2.2.2 Better regulation (only for DGs managing regulatory acquis)

N/A

2.2.3 Information management aspects

In line with the **Information Management Steering Board (IMSB) action plan** on internal transparency on the Commission data, information and knowledge assets, DGT opted for the 'Commission file reader' setting to be activated by default in September 2017 when creating new files. On 31 December 2019, 77.91% of newly created files in DGT were given visibility at the Commission level.

In line with the Commission's **Data Protection action plan** (C(2018)7432), DGT's Data Protection Coordinator (DPC) converted all previous notifications (18) into records via the new Data Protection Management System (DPMS). More specifically, 18 processing operations were identified (16 legacy notifications were transferred into the records and published in the Register of the Data Protection Officer (DPO), 1 notification was pending DPO validation and 1 notification/record was on hold pending instructions from DPO from corporate to DG record). In addition, three new records based on the DPO´s global template records were created. The above actions have contributed to the completion of the Action Plan by the controllers and controllers' assistants (mainly directors and heads of unit), with the assistance of the Data Protection Coordinator.

The register of operations constitutes one of the pillars of ensuring accountability of the controllers, and DGT has taken appropriate technical and organisational measures (e.g. up to date specific **Privacy Statements**, creation of **Guidance for all DGT staff on Data Protection issues**, **Guidance on Data Protection Breach**, internal **face to face meetings with Units**) to comply with the rules on personal data protection and the principles relating to processing of personal data (Art. 4 of Reg. (EU) 2018/1725).

DGT also drew up a **manual on data protection** for DGT staff, which was communicated to all DGT staff and published on the data protection site on the intranet. Guidance on managing data breaches was distributed to DGT controllers and published on the intranet.

Under the IDPR, it is no longer possible to restrict data subject rights (the persons whose data is involved) on an ad hoc basis. In order to restrict such rights, the Commission needs to adopt so-called internal rules. DPO decided that this should be implemented by way of Commission decisions and that separate decisions would need to be adopted for each type of processing operation, rather than one single decision for the entire Commission. This issue it is not expected to occur in DGT considered the type of data that manages.

DGT DPC organised several **meetings with the controllers and assistant controllers** on the implementation of the new action plan and the underlying requirements, including an infosession with the DPO on 19 December 2019. All the necessary steps were taken in terms of preparing and implementing of processing operations and tasks required in the data protection action plan in order to bring DGT in full compliance with the rules.

The implementation of **knowledge management schemes** (InfoSessions, Share! events, DGT Radio, IT tips, Office swaps and informal language learning actions) is well established. InfoSessions – short presentations by experts from other DGs or EU agencies, intended to provide background information and to clarify terminology about demanding documents or translation packages, EU policies or initiatives, and activities of other DGs, DGT language departments or other institutions – are particularly appreciated by DGT translators and translation assistants.

In early 2019, DGT introduced a new knowledge management scheme – **DGTalk** – that aims to provide an opportunity for DGT staff to discuss and be informed on subjects related to languages, European integration, and current news.

DGT also organised an awareness-raising campaign on the e-learning offer (DGT-internal, Commission-wide and external) to translation directorates. DGT also produced three **e-learning modules**: on the use of electronic corpora in translation, on inclusive language and on quality management in DGT. The latter was presented in two well-appreciated staff fora on translation quality in late 2019.

2.2.4 External communication activities

The twelfth round of the ***Juvenes Translatores*** contest was completed, with media reporting extensively on the winners announced in February. The **awards ceremony** in the presence of Commissioner Oettinger took place in April. To accommodate non-selected schools and honour those receiving special mentions, eleven workshops were organised by field officers in eight member states.

The thirteenth round was launched in September, followed by an extensive communication campaign informing schools and teachers that the contest would be run online for the first time. The **new database** enabled students to translate on PCs instead of paper and helps the team manage the contest more efficiently. The **contest day** took place on 21 November in **740 schools.** Translations were ready for marking sooner than usual and thanks to the new database, markers did not have to struggle decrypting handwritten translations. DGT translators marked in total **3,116 translations.**

For the **European Day of Languages** (26 September) the field officers organised **139 events** in their Member States reaching out to 62,000 citizens and almost doubling last year's figures (37,000). **The social media campaign** on Facebook, Twitter, Instagram and SMARP was based on videos presenting 24 tongue twisters that were also used in the new EDL poster. Cumulatively, the posts reached 656,050 readers.

A **communication campaign** to promote the new call for tenders (freelance translators) TRAD19 was carried out, including paid social media posting.

The number of followers of all **DGT's social media channels** continued to grow, especially in the context of *Juvenes Translatores*. Instagram proved to be DGT's best tool to communicate with the youngest audience. DGT also participated in the biannual **European Youth Week** by co-hosting with DG EAC a workshop on language learning and translation, with DGT and DG SCIC staff as speakers.

DGT was present at the **EU Open Day** in Brussels in May. The activities on the joint stand with DG SCIC focused on the topic 'What EU does for me' in view of the 2019 EP Elections. DGT was also present at the interinstitutional stand in the **Fête de l'Europe** in Luxembourg.