



European
Commission

Annual Activity Report 2021

DG TRANSLATION

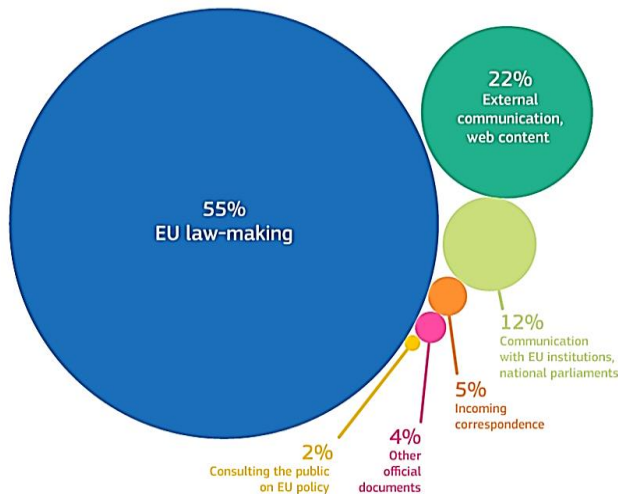
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THE DG IN BRIEF

DGT's overarching goal is to provide the European Commission with **high-quality translations and other linguistic services in 24 languages**. Alongside translation work, which is the biggest part of its core business, DGT also provides other services, including editing and linguistic advice, language localisation and machine translation. These

What we translate



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 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.

In collaboration with DG CNECT and DG DIGIT under the digital Europe programme, DGT also helps put into practice the institutions' commitment to **digital multilingualism** by extending the roll-out of a secure and reliable, EU-owned machine translation service, **eTranslation.**

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

EXECUTIVE SUMMARY

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

A. Key results and progress towards achieving the Commission's general objectives and DG's specific objectives (executive summary of Section 1)

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 an **editing service** as part of the drafting process to make the language clear, correct and more concise. In 2021 DGT enabled the Commission to take swift action on its political priorities, including overnight reactions to the COVID-19 pandemic. The multilingual support included translating **major political files** such as the *Recovery and Resilience Facility package*, the ambitious *Fit for 55 package* and a number of very technical, high-profile and voluminous packages in the areas of finance, digital technology and health. DGT was instrumental in the launch of the multilingual digital platform of the *Conference on the Future of Europe*, integrating human and machine translation and allowing EU citizens to share their ideas in any of the EU official languages.

DGT also contributes to the general objective of making **'Europe fit for the digital age'** by providing a secure and reliable EU-owned, AI-based machine translation system, **eTranslation**, which is an integral part of DGT's core business. eTranslation is being used both as a working tool in DGT and in other translation services of the EU institutions and as a stand-alone service available to all Commission departments. It can also be used by public administrations across the EU, small and medium-sized businesses and university language faculties. Over the reporting period, DGT continued to improve the linguistic quality of eTranslation by releasing several new translation engines ⁽²⁾ and regularly updating the existing ones.

Challenges given the context

To deliver on its main priorities, the Commission worked at an accelerated pace on communication as well as on political and legal action. As a result, DGT faced **high**

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

⁽²⁾ An 'engine' is a machine translation system built for a specific language combination or domain (e.g. finance) and trained with specific linguistic data.

demand, combined with **instable texts** until late in the process and **extremely short deadlines**. DGT also witnessed an overall increase in the **volume** and **versions** of political documents sent for translation.

Despite the challenges, DGT kept on delivering, by applying sound risk management to prioritise and concentrate resources on the most sensitive, difficult or urgent files. DGT could thus efficiently provide services and products on time and with fit-for-purpose quality. It did so thanks to the efforts made by all staff to respond to the unpredictable and high demand with flexibility, team spirit and overtime when necessary. This demonstrated once again the value of having highly skilled and agile staff working in a fully digitalised workplace.

Highlights for 2021

<p>DGT enabled the Commission to respond promptly and deliver on its political priorities.</p>	<p>DGT ensured business continuity despite the challenges posed by the COVID-19 pandemic and the exceptionally high and often unpredictable demand. This included the Recovery and Resilience Facility package, the Fit for 55 package, and other high-profile documents. Total production reached an all-time high of 2 770 000 pages (up 18%, or 420 000 pages, from 2020, and up 40% or 790 000 pages from 2019).</p>
<p>DGT used its resources mix efficiently to meet urgent demand.</p>	<p>DGT continued to rely on its flexible resources structure combining permanent and temporary staff, outsourcing and language technology. To handle urgent and large documents and packages arriving at the same time, DGT outsourced 37.4% of its production, with the highest ever volume of pages outsourced, amounting to 1 040 000 pages (up 42.6%, or 310 000 pages from 2020, and up 66.4% or 410 000 pages from 2019). For the first time, DGT applied a differentiated approach in delivering eTranslation output with limited checks on selected voluminous documents to deliver to imperative deadlines.</p>
<p>eTranslation enabled multilingual communication where human translation was not available.</p>	<p>Demand for machine translation continued to grow. In 2021, 110 separate IT systems were connected to eTranslation (up from 85 at the end of 2020), including high-profile communication platforms such as the platform of the Conference on the Future of Europe and the Re-open EU app. 2021 saw a substantial rise in the integration of eTranslation into the Europa websites, with 75 websites using it at the end of 2021 (up from 7 in 2020).</p>
<p>DGT invested in staff to maintain the right skillsets in the organisation.</p>	<p>DGT continued to offer its staff a wide range of learning and development opportunities, provided online due to COVID-19 restrictions. As part of its ongoing response to the acceleration of technological developments in the language industry, DGT organised 234 training sessions to enhance staff's digital proficiency and expanded its upskilling offer with new training and development paths designed for quality officers and terminologists to build additional technological and data-related skills.</p>

DGT built capacity for a full Irish language regime as of 1 January 2022.

DGT completed the **recruitment of Irish language staff** and drafted the **second report** from the Commission to the Council on the available language capacity for Irish, adopted on 21 June. The report concluded that all the EU institutions have **sufficient capacity** to meet all demand for translation into Irish as of 1 January 2022.

DGT further developed its IT and data management.

DGT adopted its **digital master plan** for the period 2021-2024, setting out the strategic and operational priorities for digital development in IT technology, data, people/skills and processes, and reflecting DGT's contribution to the **digital Europe programme**. It also adopted its **data strategy**, setting out the framework for managing linguistic and operational data, and started preparations for the **eDGT programme**, a single platform to replace its complex system of ageing workflow applications and to provide for automation with innovative AI and data-driven features.

DGT helped the Commission communicate clearly.

DGT edited **56%** of the Commission's **politically sensitive and important initiatives** (up from 37.9% at the end of 2020). DGT trainers organised **71 clear writing training events** for 3 700 Commission officials, greatly exceeding the target of 30 or more courses set in DGT's management plan for 2021.

DGT brought language stakeholders together.

DGT continued promoting multilingualism and the translation profession mainly through online events by organising the yearly **Translating Europe Forum**, with over 1750 participants, the 14th round of the **Juvenes Translatores** contest to reward the best young translators in the EU, 76 events to mark the **European Day of Languages** and 42 **Translating Europe workshops**. The **European Master's in Translation (EMT) network** launched the **EMT challenge**, a new contest for university students centring on the digital aspects of the translation profession.

B. Key Performance Indicators (KPIs)

All key performance indicators show that DGT performed well in 2021 and is on track to fulfil the objectives set in its strategic plan for 2020-2024.



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

C. Key conclusions on Financial management and Internal control (executive summary of Section 2.1)

In line with the Commission's Internal Control Framework DGT has assessed its internal control systems during the reporting year and has concluded that it is effective and the components and principles are present and functioning as intended. Please refer to 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. The Acting Director-General, in his capacity as Authorising Officer by Delegation, has signed the Declaration of Assurance.

D. Provision of information to the Commissioner(s)

In the context of the regular meetings during the year between 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 responsible for Budget and Human Resources.


1. KEY RESULTS and progress towards achieving the Commission's general objectives and DG's specific objectives

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 an **editing** service in the drafting process to make the language clear, correct and more concise.

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

In 2021, DGT **produced 2 770 000 pages**, its highest production volume ever for a second year in a row. This is an increase of 18% when compared to 2020, and an increase of 40% when compared to 2019.



In 2021, DGT registered its highest ever production.

DGT supported the Commission to work at an accelerated pace on all its political priorities by ensuring full multilingualism of the decision-making process. This involved translating **unprecedented volumes** within **extremely short timelines**, including a number of urgent files related to the COVID-19 pandemic. The most prominent file in 2021 was the **Recovery and Resilience Facility package** (Commission decisions on national resilience and recovery plans under the NextGenerationEU facility). Given the very tight and binding timeframe of this package and the volumes of the files, specific translation arrangements were put in place to ensure timely delivery by using eTranslation output with limited checks for parts of the package. Other highlights included the translations of the **Fit for 55 package** and other **Green Deal-related packages** (Energy and Climate, Efficient and Green Mobility, Nature), as well as the Digitalisation and the Democracy packages. Among the most visible web content provided were the translations related to the **multilingual digital platform for the Conference on the Future of Europe**.

DGT responded swiftly and flexibly to meet the unprecedented high demand and managed to maintain a very high **deadline compliance rate** of 99.1%, only slightly below the target of **99.5%** set out in DGT's strategic plan for 2020-2024. A customer satisfaction survey carried out by DGT in June 2021 showed that the overall **customer satisfaction rate** with DGT's products and services continues to be very high (**90.3%**), well above the target set in DGT's strategic plan for 2020-2024.

To ensure optimal service, DGT also made **special arrangements** for specific requests, such as the Task Force President, in which dedicated translators respond to urgent requests

from the President's cabinet, and a stand-by team for speeches and statements by the President in the three procedural languages.

Demand for **editing**, though not a compulsory stage in the drafting process, remained stable, with DGT editing in total 32 500 pages (slightly up from 32 000 pages in 2020).

Thanks to extensive outreach work and to the close follow-up of the decision-making process by DGT, the share of edited **politically sensitive and important initiatives** (PSIs) rose to **56%**, significantly up from 38% at the end of 2020, showing good progress towards the 2022 interim milestone of $\geq 65\%$ set in DGT's strategic plan for 2020-2024. Where PSIs were not edited, it was mainly due to the urgency of the file, or because it was already being translated during interservice consultation. PSIs accounted for a 26% share of DGT's editing output in 2021.



Editing and clear writing are part of DGT's commitment to improve the quality of drafting in the Commission. In 2021, DGT invested in implementing its comprehensive **strategy on clear writing and editing**. Key achievements include activating the new Clear Writing Steering Group, revising the training offer, organising high-level events, such as the very successful [Clear Writing for Europe conference](#) on 13 and 14 October 2021 ⁽³⁾, and continuing to attract more subscribers to weekly clear writing tips, which are now received by over 15 700 Commission staff.



'Clear writing is a matter of trust: making Europe not only comprehensible but also more democratic'.

Johannes Hahn, European Commissioner for Budget and Administration

In response to strong demand, DGT organised 71 **clear writing training events** and greatly exceeded the target of 30 or more courses for the year. The courses reached over 3 700 participants from all Commission sites around the world thanks to the online format.

Work on **quality management** in 2021 included a **common ex post evaluation of DGT's 2020 production**, aimed at collecting statistically reliable and comparable data across language departments. The results showed that, thanks to the mechanisms in place, the quality of translations produced by DGT was high and consistent across departments and text categories.

⁽³⁾ The conference brought together some 500 people from across the EU. All 27 Member States attended, as well as 35 international organisations represented in the International Annual Meeting on Language Arrangements, Documentation and Publications (IAMLADP).

As the service responsible for the translation of Commission autonomous acts and proposals for legislative acts ⁽⁴⁾, DGT also handles the formal procedure for **correcting translated versions** of Commission acts already in force. In 2021, 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 0.41%, below the tolerance level of 0.5% set in DGT's strategic plan for 2020-2024.

Terminology work focused on supporting the translation units in securing the consistency and correctness of terms and on maintaining, feeding, consolidating and cleaning **IATE**, the interinstitutional terminology database. This included setting up a framework for generating and sharing term extractions from documents in translation and developing e-Learning modules and online training on IATE and other terminology tools.

DGT continued to update its **service-level agreements** with other Commission departments to help anticipate demand and strengthen cooperation. The share of requesting DGs with a service-level agreement with DGT is **84%**, below the target set for 2021. Negotiations on updating or concluding further service-level agreements are ongoing. For a few number of DGs, a service-level agreement with DGT is less relevant due to the low volume of their demand, e.g. DG HR.

DGT continued to provide **eTranslation** as a service to meet the growing demand for machine translation in the Commission and beyond (see specific objective 2.1). The use of **eTranslation** within the Commission further grew in 2021, with the number of pages submitted by Commission departments rising by 75.5% (up to some 7 800 000 pages from around 4 450 000 pages in 2020). DGT successfully negotiated the incorporation of eTranslation into the Commission's Reusable Solutions Platform as of 2022, as the official corporate machine translation solution. The expanding use of eTranslation led DGT to create an **eTranslation advisory service** as the main point of contact for machine translation needs in the Commission as of early 2022.



DGT prepared to start full language regime in Irish

DGT completed its preparatory work to provide a **full language regime in Irish** as of 1 January 2022, stepping up its measures to recruit a sufficient number of Irish language staff. The temporary agent selection procedure launched in 2020 was completed, producing a list of 50 successful candidates. At the end of 2021, the number of staff in the Irish Department was 61, of whom 12 translators were working from the extended field office created in DG SANTE's premises in Grange, County Meath (Ireland).

As required in Council Regulation (EU, Euratom) 2015/2264, DGT drafted the **second report** from the Commission to the Council on the available language capacity for Irish in

⁽⁴⁾ Legislative acts are legal acts adopted by the Council and the Parliament in the ordinary or special legislative procedure in accordance with Articles 289, 293 and 294 of the Lisbon Treaty.

the EU institutions. The report concluded that the EU institutions would have **sufficient capacity** to meet all demand for translating legislation into Irish as of 1 January 2022.

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

In 2021, DGT continued its work on a complete, stable and performant computer-assisted working environment that supports automation and collaborative working methods. This includes the CATE Next Generation and Euramis Next Generation projects.

CATE Next Generation will enable DGT translators to move to a server-based working environment, thus facilitating collaboration, the automation of preparatory work and process harmonisation and reengineering. In 2021, DGT worked with DIGIT on the design of the production infrastructure and defined the minimum viable product, i.e. a first release of the tool with added value to DGT users in terms of collaboration and automation.

Development of the **Euramis Next Generation** platform progressed, although somewhat slower than planned. Euramis - the central translation memory system of DGT and the other EU institutions and bodies - is a key resource for DGT and an important component of the workflow of all EU institutions’ translation services. DGT’s multiannual goal is to revamp the technological platform and enrich the content with metadata to provide contextual information and facilitate the efficient reuse of linguistic data.

DGT further improved its re-use of linguistic data.

In 2021, DGT rolled out three testable releases of the platform to internal and interinstitutional testers. The **re-usability rate** ⁽⁵⁾ of Euramis segments rose from 33.7% in 2020 to 42.7% in 2021 and the **use of linguistic data assets** remained stable at 86%. The **number of segments** ⁽⁶⁾ available in Euramis at the end of 2021 was almost 1.6 billion (an 8.1% increase on 2020).

The roll-out of **ePoetry**, the application used by Commission departments to submit requests for language services to DGT, continued with three releases of the user interface to bring several functional improvements. DGT pursued its preparatory work with other Commission departments to integrate ePoetry with other Commission-wide IT systems (e.g. Decide and the press release database).

297 eTranslation engines built/ upgraded

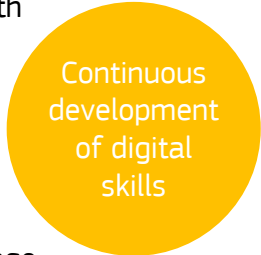
DGT also continued working on the linguistic quality of **eTranslation**. It increased the number of **machine translation engines** – both building of new engines and upgrading of existing ones – to 297, exceeding the 2024 target of 200 set out in DGT’s strategic plan 2020-2024. Improvements included general text engines, which are

⁽⁵⁾ The re-usability rate indicates how useful current Euramis memories are for new translations.
⁽⁶⁾ A ‘segment’ usually consists of a sentence or sentence-like unit (a heading, a title or an item in a list).

better suited to texts that do not use EU formal language, and expanding the language coverage to include Japanese and Arabic.

DGT continued to cooperate 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 project. The EU translation services agreed to develop a technical proposal to replace Elise, the tool for interinstitutional communication on translation files, by June 2022.

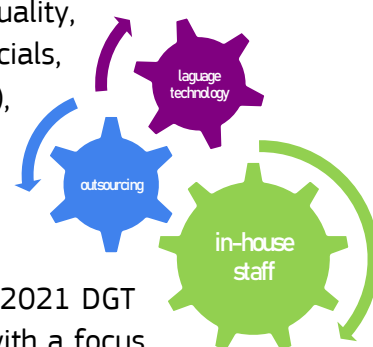
Developing advanced digital competence has become an essential part of DGT's digital transformation and efficiency drive. A **digital skills monitoring report** adopted in 2021 clearly showed that boosting the digital confidence of translators and translation assistants by continuous targeted training had been important in coping with unprecedented production volumes while working remotely and with only remote access to language resources. DGT's network of **language technology coordinators** proved particularly valuable, with coordinators acting as first-level support for colleagues working remotely. DGT drew up a specific training and development programme specifying a set of common core competences for language technology coordinators.



The high level of **confidence in core IT skills** is also reflected in the small share of incident tickets issued by DGT's operational support team in 2021 in the category 'Incidents linked to user's knowledge' (3.6%), well below the tolerance level of 5% set out in DGT's management plan for 2021.

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

To reach its aim of meeting demand without compromising on quality, DGT uses a resources mix consisting of **in-house staff** (officials, temporary agents and contract agents – see Annex 10), **outsourcing** and **language technology**. An agile combination of all these resources enabled DGT to meet the high demand in 2021 and increase its productivity (see Annex 2).



As part of its human resources strategy for the coming years, in 2021 DGT adopted its **resources and succession plan for 2021-2027** with a focus on this flexible mix of resources to enable DGT to provide high-quality translation services essential to the Commission and to continue contributing to the Commission's redeployment needs until 2027.

In-house staff form the backbone of DGT's capacity. They cater for **urgent, confidential and specialised translations** that are not suitable for outsourcing or have very short deadlines. The COVID-19 pandemic and the working methods of the current Commission had an impact on the working methods of the translation units, with in-house translators being key to ensuring the timely delivery of all urgent and highly political requests.

Based on its resources and succession plan, in 2021 DGT launched **temporary agent selections** for Danish, Finnish, German and Swedish translators. It also recruited from the reserve list of the temporary agent selection for Irish translators to build capacity in the Irish language department.

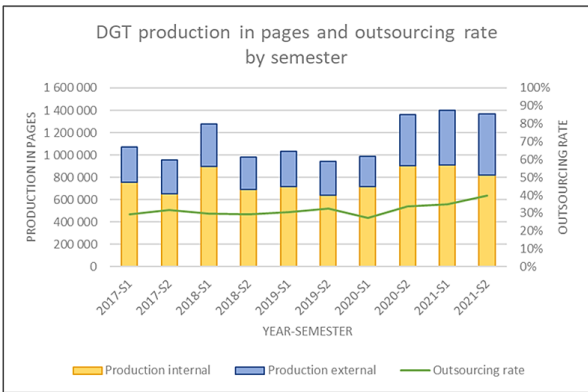
DGT also joined an interinstitutional initiative to set up a **database** of temporary agents and contract agents with translation-related profiles who are reaching the end of their contracts in one institution and may have an interesting profile for another institution.

DGT continued to offer its staff a wide range of **learning and development** opportunities (see Section 2.2.1).

Outsourcing accounts for a growing share of the resources mix, in view of the steady increase in demand and the progressive reduction of internal resources. To handle fluctuations in demand, DGT outsources part of its production to **qualified contractors**, selected and managed in line with public procurement rules.

2021 saw heavy fluctuations in demand: while the average production was above 230 000 pages per month, the actual monthly volumes ranged from 170 000 to 375 000 pages ⁽⁷⁾, reaching the highest peak in June with the Recovery and Resilience Facility package. To process the concurrent inflow of urgent voluminous documents and packages efficiently, **DGT outsourced around 1 040 000 pages**, some 37.4% of total production for 2021 and a 42% increase on the 730 000 pages outsourced in 2020. Thanks to the new outsourcing approach in place, more than 73% of the production increase over 2020 was absorbed by external contractors.

The graph below shows how demand and outsourcing have evolved over half-yearly intervals since 2017. The increase in demand after the second semester of 2020 led to an increase in outsourced pages to cover what could not be translated in house.



To ensure consistent quality of outsourced translations, DGT has a procedure to monitor the performance of its contractors on a monthly basis. With **95.6%** of outsourced translations

⁽⁷⁾ The record high June production figures include 89 000 pages for which DGT applied a differentiated approach (eTranslation output with limited checks).

marked 'very good' or 'good', the **freelance quality rate** rose by 3.4 percentage points in 2021 compared to 2020.

Investment in cutting-edge **technology** and tools continued, with the focus on eTranslation and on the reuse of linguistic data (see specific objective 7.2 for details). DGT has started defining a machine translation based workflow to be used to alleviate workload in situations when standard translation procedures are not possible.

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

Despite the persisting restrictions under COVID-19, DGT managed to link up with its many stakeholders, running most of its outreach activities online.



In June, DGT organised the award ceremony ⁽⁸⁾ of the 14th edition of the annual **Juvenes Translatores** translation contest on [YouTube live](#) and Facebook live, featuring [President Ursula von der Leyen](#).

The 15th edition of this contest for schools took place in November, with 689 schools taking part and students submitting 2 940 translations on the topic 'Let's get on track – towards a (greener) future'.

The **European Master's in Translation (EMT) network** organised its first hybrid network meeting at the University of Leipzig in October. It focused on the human factor in translation, covering the psychological aspects of distance teaching, new teaching approaches and exploring the opportunities and challenges of accessibility in translation. In 2021, DGT launched the **EMT challenge**, a new contest for EMT students, focusing on mastery of the digital aspects of the translation profession.

The winners of the EMT challenge were announced during the annual **Translating Europe Forum**, held online in November with the title 'Collaboration in times of automation'. A total of 38 speakers representing academia, research community, language service providers, language technology developers, institutional translation and the freelance world shared their views on **new and developing collaboration models**. The renewed **Language Industry expert group (LIND)** supported DGT in the organisation of the event, which was attended live by 1 750 participants, with a further 4 000 unique viewers following afterwards on DGT's YouTube channel. The satisfaction rate amongst the surveyed participants was 98.6%.



⁽⁸⁾ Link to the online ceremony video: https://youtu.be/lOJtw_hwfFk

In 2021, DGT organised 42 **Translating Europe workshops** at national level, mostly online, gathering more than 7600 participants, with more than 14 500 views after the events (e.g. on Youtube). The workshops covered topics such as language technologies, machine translation and post-editing, audio-visual translation, new skills and trends, inclusive language, accessibility. 15 of these workshops included promotion of eTranslation.

DGT currently posts 27 **field officers** to work in the Commission Representations in **25 EU countries**. Due to the COVID-19 pandemic, events took place mostly online or in hybrid format, and later in the year also in-person.



In particular, DGT field officers organised 76 events (physical and online) in 25 countries to mark the **European Day of Languages** (on 26 September) and to promote multilingualism, language learning and translation. The events, accompanied by a social media campaign, were very successful and gathered EU-wide over 74 000 participants, with an overall reach estimated at over 2 000 000 people.

DGT partially resumed the **Visiting Translator Scheme**, with six online projects and two visits carried out when the situation allowed, as of September 2021.

Regarding **social media** performance, while DGT's Facebook followers slightly decreased due to British followers leaving after Brexit, followers on both Twitter and Instagram grew more than expected. DGT continued its visibility campaign '**Translation all around us**' (**#DiscoverTranslation**), aimed at promoting the translation profession to people outside the translation industry.

Interinstitutional cooperation continued smoothly despite the pandemic. In close cooperation with DG SCIC, DGT implemented the first part of the two-year work programme for the Commission's **presidency of the Interinstitutional Committee for Translation and Interpretation** and its executive and coordination committees for translation. Work encompassed language technology, working methods, recruitment and training, communication and multilingualism, outreach and awareness-raising and linguistic data. Among the highlights was the setting up of an interinstitutional database for contract and temporary agents. As part of the priorities of the Commission's presidency, DGT organised a high-level interinstitutional *Clear Writing for Europe* conference (see specific objective 7.1). DGT also promoted a joint [web presence](#) for the EU translation services in the context of the European Day of Languages.

As for **international cooperation**, DGT participated in the online meeting of the International Annual Meeting on Language Arrangements, Documentation and Publications (IAMLADP), focusing on changes in the translation profession.

General objective 2: A Europe fit for the digital age

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

In collaboration with DG CNECT and DG DIGIT under the **digital Europe programme**, DGT helped put into practice the Commission's commitment to **digital multilingualism** by extending the roll-out and development of its secure and reliable AI-based machine translation system. Outside the EU's institutions, the Commission's proprietary system **eTranslation** is available to Member State public administrations, university staff and students, participants in the digital Europe programme and small and medium-sized businesses.



'Europe's digital transition must protect and empower citizens, businesses and society as a whole. It has to deliver for people so that they feel the benefits of technology in their lives.'

Ursula von der Leyen, President of the European Commission

In addition, eTranslation is available for **machine-to-machine use**, providing translation for EU platforms when human translation is not feasible. Integrating eTranslation into multiple multilingual EU platforms is an important way to make them accessible to the EU public. At the end of 2021, 110 separate IT systems were connected to eTranslation (up from 85 at the end of 2020), including high-profile communication platforms such as the **Re-open EU app** giving up-to-date information on the COVID-19 situation in the Member States and the platform of the **Conference on the Future of Europe**. This platform was quite active, with some 1 775 000 requests for eTranslation submitted, which generated around 512 000 pages of translation.

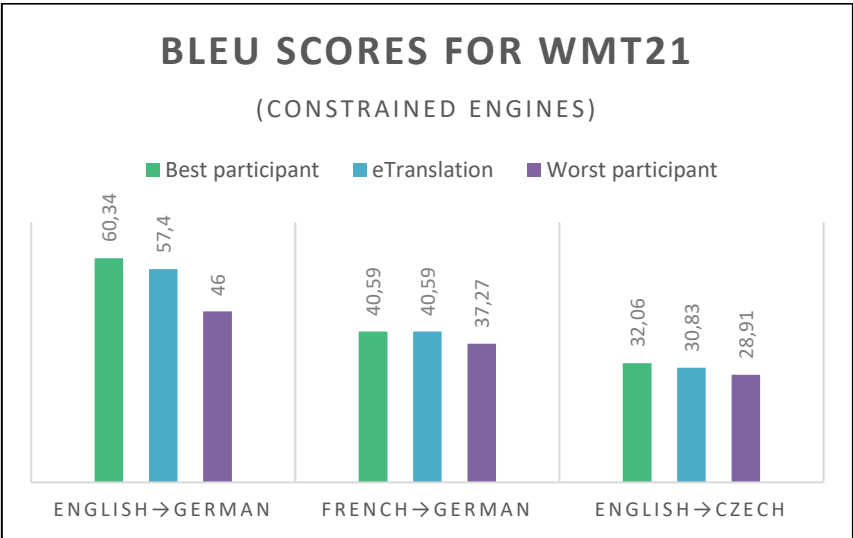


eTranslation
integrated
into EU
platforms

The Commission is also **integrating eTranslation into the Europa websites**. Following a pilot phase started in October 2020, the number of websites using eTranslation has increased dramatically. From 7 in 2020, 75 were connected in 2021, with around 210 000 eTranslation requests triggered by EU citizens (up from 3 500 in 2020). This is made possible by an eTranslation widget which makes it easy to add eTranslation to Commission websites built using the corporate Europa Web Publishing Platform.

DGT helped set up the first on-site installation of eTranslation in the **European Public Prosecutor's Office** (EPPO). DGT and the Translation Centre worked together on this project to give EPPO a machine translation solution that complies with the agency-specific high confidentiality needs deriving from its legal framework and the nature of its work.

DGT participated in the **6th Conference on Machine Translation (WMT21)** in November 2021. The conference is a forum where the main players in industry and academia can test their skills by building custom engines according to the rules of ‘shared tasks’. Results are compared against each other and against the main online systems. Participants are required to publish papers describing the techniques they applied, providing a rich vein for improvements to bring into the pipeline. eTranslation took part with three language pairs. The results showed that eTranslation is on a par with other state-of-the-art systems, ranking well both automatically (BLEU score) and when evaluated by human judges. Indeed, by BLEU score, eTranslation led the field in the French to German category.



Work progressed on other language technology services and products in cooperation with DG SCIC and DG DIGIT, the most prominent development being a **speech-to-text service**⁽⁹⁾. The service provides automatic transcription of audio for English, French, German and Spanish and can be used to transcribe recordings of speeches or meetings, for instance the recordings of the Conference on the Future of Europe’s Citizens’ panels. The current version is based on off-the-shelf technologies and tuned with EU-specific training material, but the goal is to have fully custom-built engines in 2022, under the digital Europe programme.

⁽⁹⁾ The speech-to-text service, as well as other tools developed by DGT, are available via the Connecting Europe’s [Language Tools](#) website.

2. MODERN AND EFFICIENT ADMINISTRATION AND INTERNAL CONTROL

2.1. Financial management and internal control

Assurance is provided on the basis of an objective examination of evidence of the effectiveness of risk management, control and governance processes.

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

- weekly reports on demand management and outsourcing;
- monthly budget execution reports and the management information scoreboard highlighting key data in areas in which action may be needed;
- biannual reports by authorising officers by sub delegation, including the results of internal control monitoring at DG level;
- 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 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.

These reports result from a systematic analysis of the available evidence. 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 covers the control results and other relevant elements that support management's assurance. It is structured into: 2.1.1 Control results, 2.1.2 Audit observations and recommendations, 2.1.3 Effectiveness of internal control systems, and resulting in 2.1.4 Conclusions on the assurance.

2.1.1. Control results

This section reports and assesses the elements identified by management which support the assurance on the achievement of the internal control objectives (ICO) ⁽¹⁰⁾. The DG's assurance building and materiality criteria are outlined in AAR Annex 5. The AAR Annex 6 outlines the main risks together with the control processes to mitigate them and the indicators used to measure the performance of the relevant control systems.

Expenditure

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

In 2021, DGT managed EUR 39.92 million of expenditure ⁽¹¹⁾ with direct responsibility for EUR 29.32 million (the rest being appropriations for external personnel and delegated funds).

Funds co-delegated by other DGs to DGT amount to EUR 4.70 million. They mainly cover external translation costs (EUR 3.25 million committed). DG EAC co-delegates approximately EUR 0.45 million for the organisation of external communication activities under Key Action 3 related to multilingualism ⁽¹²⁾ and CNECT co-delegates EUR 1 million (under the Digital Europe work 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 funds managed (funds received in co-delegation, sub-delegation or own funds).

⁽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 (Article 36.2 of the Financial Regulation). The 2nd and/or 3rd Internal Control Objective(s) only when applicable, given the DG's activities.

⁽¹¹⁾ Amount of legal commitments made during the year, including funds sub-delegated and co-delegated by other DGs.

⁽¹²⁾ 2021 annual work programme - Erasmus+, Commission Decision of 25/03/2021 [C(2021)1939] and amendments thereof [C(2021)7336].

Legal commitments by procurement type	Budget (€ 000)	% of total budget	Number of transactions	% of total transactions
Type 1: DGT FWC & NP - external translation including funds co-delegated by other DGs	23 061	79%	26 105	98%
Type 2: DIGIT FWC (IT) + other IT expenditure (incl. funds sub-delegated by CNECT)	5 154	18%	49	0%
Type 3: Low value NP, AMI, FWC (from other DGs) (conferences and events, library expenditure, terminology)	1 036	4%	292	1%
Type 4: Missions	67	0%	215	1%
Total	29 318**		26 661	

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

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

As DGT does not manage programmes and grants, and has a control strategy based on comprehensive *ex ante* control, **there are no *ex post* controls**.

Any errors identified are corrected before contracts are signed or payments authorised.

Revenue

In terms of **revenue**, in 2021 DGT issued:

- debit notes for EUR 1.80 million to EU and partner institutions for the use of shared IT translation tools in the framework of the interinstitutional Annual Financing Agreement;
- debit notes for EUR 481 000 to other Commission departments as internal chargeback for external translation (i.e. when not covered by co-delegation);
- debit notes for EUR 131 000 stemming from performance penalties under the framework contracts linked to external translation.

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

Overview table (amounts in EUR million)

Risk-type / activities	Grants (e.g. actual costs based, or lump sums or entitlements)	Procurement (e.g. minor or major values)	Shared mngt (MS's OPs, PAs, etc.) + EAC (for NAs)	Cross-delegations to other DGs (other AOXDs)	Contributions and/or funds to EE (EU Agency, EA, JU)	Delegation / Contribution agreements with EE (EIB, Int-Org, etc.)	Other (describe any other expenditure not covered by the previous columns)	Total Expenditure	NEI, e.g. Revenues, Assets, OBS ((in)tangible or financial assets & liabilities)
External translation		21.74						21.74	0.61
IT		4.95						4.95	1.80
Other activities		1.30						1.30	
Total (coverage)		27.99						27.99	2.41

Legend for the abbreviations: OP=Operational Programme, PA=Paying Agency, NA=National Agency, AOXDs =Authorising Officer by Cross-Delegation, EA=Executive Agency, JU=Joint Undertaking, NEI =Non-Expenditure Item(s), OBS= Off-Balance Sheet, ICO = Internal Control Objective, L&R=Legality and Regularity, SFM= Sound Financial Management, AFS= Anti-Fraud Strategy measures, SAI=Safeguarding Assets and Information, TFV=True and Fair View, RER=Residual Error Rate, CEC=Cost-effectiveness of controls, Mngt =Management

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

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

1. Effectiveness of controls

a) Legality and regularity of the transactions

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

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

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

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

Expenditure

- **Management of outsourced translations (79% of DGT 2021 budget).** DGT launches an open call for tenders every four years, leading to the conclusion of framework contracts for selected language combinations. The latest contracts started on 1 July 2020. If a language combination is not covered by a framework contract or if no contractor responds to the call for tender, the contract is awarded by negotiated procedure. All procedures are documented and regularly updated.

The finance unit and lawyers in unit DGT.01 performed *ex ante* controls: they reviewed the tender documents before launching the open call for tender, and the framework contracts before the award decisions.

Effectiveness indicators – procurement	
Number of framework contracts terminated in 2021	
• For lack of use	0
• For poor performance of contractor	0

Source: DGT internal statistics

Follow-up on effectiveness indicator 2020: one litigation case was filed in 2020. In 2021, the General Court dismissed the case.

For this segment, 26 non-compliances and requests for exceptions were recorded. They were related to procurement *procedural* errors (negotiated procedures above the set threshold). These are not *payment* errors and therefore have no impact on the budget. Short and medium-term solutions are being considered by senior management.

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

Effectiveness indicators – financial transactions	
% error rate prevented	99.5% ⁽¹³⁾
Amount of liquidated damages (for bad quality)	€5 447
Amount of liquidated damages (for late delivery)	€1 804
Percentage of translations rated good or very good by the evaluators	95.6%

Source: DGT internal statistics

- **Management of IT contracts (18% of DGT 2021 budget).** DGT launches an open call for tender for the CATE tool (computer-aided translation) every four years. It launched the latest call for tender in 2019.

For all other operations, 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.

For this segment, there were no non-compliance events or requests for exceptions.

⁽¹³⁾ The error rate is set at 0.5%, a percentage based on historical levels of error rates for administrative expenditure at Commission level and used as a prudent figure by DGT.

Effectiveness indicators – financial transactions	
% error rate prevented	99.5% ⁽¹⁴⁾
Number of control failures	0
Amount of liquidated damages	0

Source: DGT internal statistics.

- **Management of other procurements (4% of DGT 2021 budget):** 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. DGT strictly applies the minimum competition requirements set in the Financial Regulation. All tender documents are reviewed by DGT's finance unit before the contract is signed. For contracts over EUR 15 000, the tender documents are also reviewed by lawyers in unit DGT.01. The final contracts, delivery reports and invoices are checked by the finance unit before authorising payment.

For this segment, 11 non-compliances and requests for exceptions were registered. Neither the amount nor the issue are materials, follow-up is ensured and mitigating measures are in place. There is no impact on the budget.

- **Management of mission orders and cost declarations (<1% of DGT 2021 budget).** Until 15 February 2021, all mission orders and costs declarations were verified by DGT's finance unit before approval by the authorising officer. As from that date, the mission management is taken over by the Paymaster's Office, under a pilot project. The authorising officer role remains in DGT. Because of the very low number of missions organised during the original six-month trial period, the project has been extended until 15 February 2022.

For this segment, there were no non-compliance events or requests for exceptions.

Following a cost-benefit analysis, and given that transactions for the main part of the budget are automated, framework contracts are used intensively. Given the structure of the financial circuits and the results of the *ex ante* controls, **no *ex post* controls** are carried out on procurement.

Revenue

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

Benefits of controls – conclusion

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

⁽¹⁴⁾ See previous footnote.

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

In 2021 however, procedural procurement errors were detected for the segment 'external translation'. As per the instructions, the full amount concerned by the procedural errors is considered to be at risk (no corrections made), even if there is no financial impact⁽¹⁵⁾. So, the error rate for this segment is 3.6%, leading to a general error rate at closure of 2.8%.

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

DGT's relevant expenditure, its estimated overall risk at payment, estimated future corrections and risk at closure are set out in Table X: Estimated risk at payment and at closure.

The estimated overall risk at payment for 2021 expenditure amounts to EUR 0.81 million, representing 2.91 % of the DG's total relevant expenditure for 2021. This 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 at the time the payment was made.

Since DGT has a fully centralised financial circuit for payments, with extensive *ex ante* controls, expenditure is not subsequently subject to *ex post* controls. The conservatively estimated future corrections for 2021 expenditure are therefore EUR 0.03million.

The difference between those two amounts results in the estimated overall risk at closure of EUR 0.78 million, representing 2.8 % of the DG's total relevant expenditure for 2021. This is an increase of 2.8% due to procedural errors in procurement as explained above.

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

⁽¹⁵⁾ For such *procedural* errors, the Commission does not consider that the full amount is at risk (no *payment* errors). However, in order to be fully transparent, and to allow stakeholders to compare the Commission's error rate with the one published by the European Court of Auditors (ECA), the full amount at risk for the 'external translation' segment is reported in Table X below. Note that 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).

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	Relevant expenditure	Estimated risk (error rate %) at payment		Estimated future corrections and deductions		Estimated risk (error rate %) at closure	
		(1)	(2)	(3)	(4)	(5)	(6)
	m EUR	m EUR	%	m EUR	%	m EUR	%
Outsourcing	21.75	0.78	3.6	0	0	0.78	3.6
IT	4.95	0.02	0.5	0.02	0.5	0	0
Other	1.30	0.01	0.5	0.01	0.5	0	0
DG total	27.99 m EUR	0.81m EUR	2.91%	0.03m EUR	0.11%	0.78m EUR	2.80%

b) 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. In December 2020, as a result of a comprehensive risk and fraud assessment and based on DGT's strategic plan 2020-2024, DGT updated its anti-fraud strategy. The next revision will take place with the next strategic plan (2024) in line with the low risk of DGT and its mature business processes. Fraud risks are nevertheless re-assessed each year in the context of the management plan. In line with the Commission's new anti-fraud strategy, fraud prevention and detection aspects are emphasised in all risk assessments performed.

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

The results achieved during the year thanks to the anti-fraud measures in place can be summarised as follows: no leaks or misuse of sensitive information nor fraud cases were reported in 2021. There were no pending investigations opened by OLAF from previous years and no potential fraud related case reported to or by either OLAF or IDOC in 2021.

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

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

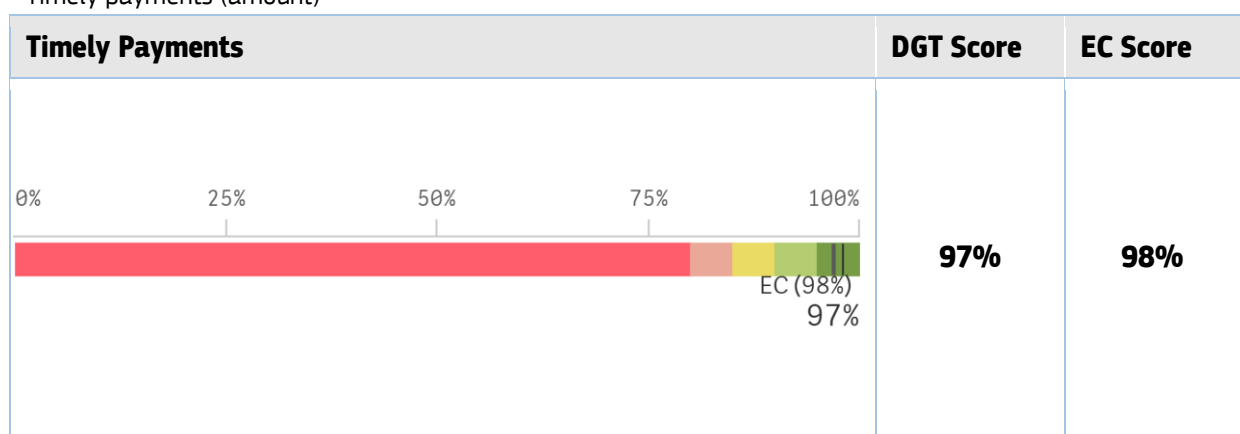
Not applicable ⁽¹⁶⁾.

⁽¹⁶⁾ 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

2. Efficiency of controls

The time-to-pay indicator (Article 116.1 of the Financial Regulation) for 2021 is 95.5% of payments made within the deadline (number of payments) and 97% (amount paid). A central technical issue at corporate level at the beginning of 2021 impacted a large segment of our external translation payments. Therefore our performance is slightly lower than previous years with 276 late payments (4.5% of 6 207 payments made in 2021) in terms of the number of payments made within the time limit and amount concerned.

Timely payments (amount)



(Source: Financial Dashboard – Annex 4)

	2019	2020	2021
Time-to-pay			
Number of payments within time limit	97.5%	98.6%	95.5%
Amount paid within time limit	n/a	n/a	97.0%
Average payment times			
Average net/gross payment time*	9.9/9.7 days	7.9 / 9.0 days	8.8 / 9.7 days

Source: SAP

*Net is without suspension delays/gross includes suspension delays

DGT has a fully centralised financial circuit for payments and handles a high volume of very low-value transactions. Some controls are automated (e.g. payments on the external translation budget line).

Reports monitoring the invoice workflow are extracted twice a week from the Commission's finance database, enabling DGT to react rapidly in the event of any delays in the payment workflow. DGT maintained an excellent efficiency in average payment time – see Annex 4 and table above.

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.

In 2021 DGT extended the use of qualified electronic signature (QES) where possible. As we are dealing with small contractors all over Europe, it is not always possible for them to invest in QES certificates, so DGT often uses a 'hybrid' workflow for commitments, where the contractor signs in 'blue ink', and the Commission with the QES. This has helped DGT to shorten its commitment workflow.

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

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

3. Economy of controls

The estimated cost of controls concerns the management of outsourced translation and IT budget lines (i.e. 96% of DGT's commitment appropriations). It is independent from the type of funds used (co-delegated or own funds), as the controls are identical.

DGT applies the Commission-wide methodology for estimating, assessing and reporting on the cost-effectiveness of controls. The only change compared to the previous year is that the costs are now calculated against the total amount of payments, whereas in previous years they were calculated against the total amount of legal commitments.

For **outsourced translation**, controls account for **6.45%** (vs 7% in 2020) i.e. EUR 1.4 million. This stems from the very high number of transactions (more than 25 000 in 2021). 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 2020, the lowest percentage is due to the higher amount of transactions with same number of staff.

The controls performed encompass:

- i) the legality and regularity of the transactions;
- ii) operational agent verifications before documents to be translated are sent to the contractors (correct alignments, format of translation memories, reference documents, page counting, etc.);
- iii) cost of development and maintenance of the in-house IT system that processes the bulk of financial transactions. Without this tool, it would be impossible to manage the 25 000 transactions at reasonable cost and within acceptable deadlines. For example, in 2021 over 5 500 invoices received were automatically registered in the Commission's accounting system. The number of controls integrated in the IT tool enabled better targeted financial verification and payment generation.

For the **management of the IT budget**, the overall cost of control in DGT is estimated at **1.6%** (the same as in 2020) i.e. EUR 0.08 million, including legality and regularity checks.

The extensive use of DG DIGIT framework contracts lowers the costs of procurement for DGT.

The **total cost of control** for DGT in 2020 is estimated at **5.5%** (down from 6.9% in 2020) i.e. EUR 1.5 million. See Table Y in Annex 7 for details.

4. Conclusion on the cost-effectiveness of controls

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

As explained in Section 2.1.1, DGT manages a very high number of low and very-low-value transactions (over 25 000 for all budget lines) in relation to the size of its legally committed budget (EUR 29.32 million). Although the procurement rules are simplified for low and very-low-value procurement procedures, a minimum number of controls must be carried out for each transaction to comply with the Financial Regulation. Where possible (mainly for IT), DGT uses framework contracts from other DGs. For the management of the external translation budget, most financial transactions are automated via an IT system developed and maintained in-house.

DGT's financial activities and subsequently DGT's control environment and control strategy have remained stable for years. The indicators for DGT constantly confirm low error rates and fast payments, the legality and regularity of procedures, and all goods and services procured meet the needs they are designed to cover. No new financial or control issues were identified in 2021.

2.1.2. Audit observations and recommendations

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

There were no pending IAS recommendations in 2021 and no new audit started during the year.

DG BUDG carried out in 2019 an in-depth analysis on the validation of local systems in DGT. DGT implemented all recommendations. As a consequence, the accounting risk as assessed by DG BUDG C3 in 2021 (referring to year 2020) lowered from 'medium' to 'low'.

Based on the work carried out by the IAS in 2019-2021 in DGT and taking into account the actions taken by DGT management, **the IAS concluded that the internal control systems in place for the audited processes are effective.**

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

2.1.3. Assessment of the effectiveness of internal control systems

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

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

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

- i) the year-end assessment of the internal control monitoring criteria, including baseline and target values, established in the DGT's 2021 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 including representatives of all Directorates assessed the above sources of information, on the basis of DG BUDG guidelines and templates. Particular attention was drawn to any potential cross-principle weaknesses. The conclusions, reported below, were approved by DGT's director in charge of risk management and internal control and by the Acting Director-General.

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

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

2.1.4. Conclusions on the assurance

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

DGT only manages direct centralised expenditure (low inherent risk) and has consistently had a zero error rate for years. In 2021, it reported an exceptionally higher error rate for one segment of its budget (outsourced translation). Short and medium-term solutions are proposed to management.

For 2021, DGT is above the Commission average for 8/10 standard financial indicators identified at corporate level, and none of them are below the 80% target (see Annex 4).

Processes, systems and workflows for all sectors of DGT activity are documented and updated on a regular basis, with particular attention given to the special measures put in place during the pandemic. The reports submitted by the authorising officers by sub-delegation twice a year to the authorising officer by delegation (in the biannual activity report) cover both policy and financial objectives.

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

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

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

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

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

DGT does not entrust funds nor budget implementation tasks to the Translation Centre for the Bodies of the European Union. The Centre's management board, chaired by the Director-General of DGT, will assess the Centre's 2021 annual consolidated activity report by mid-June 2022.

Overall conclusion

In conclusion, based on the elements reported above, management has reasonable assurance that, overall, suitable controls are in place and working as intended; risks are being appropriately monitored and mitigated; and necessary improvements and

reinforcements are being implemented. The Acting Director-General, in his capacity as Authorising Officer by Delegation has signed the Declaration of Assurance.

2.1.5. Declaration of Assurance

Declaration of Assurance

I, the undersigned,

Acting Director-General of the Directorate-General for Translation

In my capacity as authorising officer by delegation

Declare that the information contained in this report gives a true and fair view ⁽¹⁷⁾.

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

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

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

Brussels, 31 March 2022

(e-signed)

Christos ELLINIDES

⁽¹⁷⁾ True and fair in this context means a reliable, complete and correct view on the state of affairs in the DG/Executive Agency.

2.2. Modern and efficient administration – other aspects

2.2.1. Human resource management

In 2021, DGT continued to rely on a **flexible resource structure** that combines permanent and temporary staff, outsourcing and language technology (see specific objective 7.3).

Based on its resources and succession plan for 2021-2027, DGT launched **temporary agent selections** for Danish, Finnish, German and Swedish translators ⁽¹⁸⁾. It also recruited from the reserve list of the temporary agent selection for Irish translators to build capacity in the Irish language department.

DGT contributed further to strengthening gender parity in management by making five further **first-time appointments of women in management**. It aims to achieve 16 by the end of 2022 as opportunities become available by vacant posts. The share of women in DGT's management team reached 65%.

DGT adopted its **equality mainstreaming work plan 2021–2022** reflecting its activities and commitments in this field, including raising awareness about the benefits of diversity and inclusion and fostering a culture of inclusion and belonging at the workplace.

The **staff engagement** index is measured in the Commission's staff surveys, with the latest result of 76% in the 2021 staff survey. DGT completed the actions set out in the action plan drawn up as follow-up to the previous staff survey, carried out in 2018. They focused on staff consultations, human resources issues, career development and working equipment and conditions.

In step with the 2021 training plan, succession planning and knowledge management, DGT's **learning and development** offer focused on supporting digital proficiency for all staff, language-specific thematic competences for translators (in particular in legal, financial, economic and scientific domains), language learning in the interest of the service, organisational development and further professional training for current and incoming managers.

Within the context of the ongoing modernisation of translation process, 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 expanded its **upskilling offer** from the domain of computational linguistics to the domains of quality management and terminology. It designed customised training paths for quality officers and terminologists to build their technological and data skills.

⁽¹⁸⁾ Due to the COVID-19 pandemic, which had an impact on the functioning of EPSO's test centres, the reserve lists will only be available as of mid-2022.

Due to the COVID-19 pandemic, DGT transformed all in-person courses into online courses. Live web-streaming and audio-visual recording for internal training events as well as online and e-learning courses for external training enabled professional development to continue during the pandemic, regardless of location and time of day.

In 2021, DGT welcomed 87 Blue Book trainees and offered 43 training placements in the language departments, horizontal units and field offices. Based on the positive experience with **remote traineeships** and new approaches to sharing knowledge during the pandemic, DGT set up a **scheme for remote cooperation with universities**.

Dealing with the COVID-19 pandemic has resulted in a different way of working, communicating and engaging with staff. In 2021, DGT maintained its efforts to provide supportive working conditions and carried out targeted communication measures to foster staff engagement and well-being, including through **online meetings** between senior management, staff and trainees. On DGT's intranet, the focus was on communicating on issues close to the heart of staff, such as the future office space or people's experience in working during the pandemic. DGT made its work more visible inside the Commission through a series of **articles** published on the Commission-wide intranet, MyIntraComm.

See Annex 10 for more information on human resource management.

2.2.2. Digital transformation and information management

In 2021, DGT implemented a series of **knowledge management** measures that aim to prevent knowledge loss, capture the knowledge acquired and exchanged, and structure and improve access to codified knowledge. They included knowledge management assist visits in all language departments and horizontal units to support the adoption of knowledge transfer strategies and techniques, with a special focus on newcomers induction and legacy learning; capturing the knowledge exchanged in info sessions by producing written abstracts for later reuse; and creating further **e-learning modules** and **online tutorials**, a service which due to the circumstances saw a growing demand.

Digital skills are essential for DGT staff to keep pace with digital and technological change in the working environment and the translation profession. In the reporting period, 234 training sessions were organised within DGT, focusing on the use of the computer-assisted translation tool or on specific IT-related needs identified within language departments, up from 73 in 2020. DGT also assessed the digital skills of staff in its directorate for customer relations and in some horizontal units.

In March 2021, DGT adopted its digital master plan for 2021-2024 and data strategy. The **digital master plan** sets out high-level orientations and milestones for digital development in the four areas of IT: technology, data, people/skills and processes. **DGT's data strategy**, embracing the principles and objectives of the Commission-wide data

strategy⁽¹⁹⁾, covers linguistic data, operational data (related to DGT's core business) and support data stemming from Commission tools. The strategy addresses data management in the context of existing IT applications and takes into consideration new initiatives like the **eDGT programme**. This programme aims to create an end-to-end platform covering all steps and task of DGT's core business workflow and using whenever possible the Commission's reusable IT components.

In 2021, the preparatory phase of eDGT started, with the creation of a project management structure and the drafting of the business case. As a cornerstone of the digital modernisation of DGT, eDGT aims to simplify working methods and promote efficiency gains in the production chain.

Two ongoing key initiatives – CATE Next Generation and Euramis Next Generation – have progressed in 2021 and will enter in production in 2022 (see specific objective 7.2. for details on their contribution to the digitalisation of DGT's landscape).

Under the **Data Protection** Regulation, DGT's operational controllers and record editors made sure DGT met all its obligations. All 15 DGT records and privacy statements were reviewed, updated and published in the Data Privacy Management System. DGT kept an updated and complete inventory of all DGT data processing operations in the Commission's Data Protection Records Management system. All DGT privacy statements were updated and published on DGT's intranet.

DGT's Data Protection Coordinator provided guidance to DGT staff on how to implement the Regulation and comply with the implementing rules and the Commission's data protection action plan. Together with DGT's lawyers, the Data Protection Coordinator participated in and organised **awareness-raising sessions** with units/departments/field offices on data protection and had ad hoc meetings with teams to clarify specific aspects of data protection. The Data Protection Coordinator assessed compliance with general personal data protection principles, in particular as regards legal issues, data minimisation and storage limitation, and kept the controllers informed about rules and principles, checking with them whether the processing operations under their responsibility were compliant. DGT also finalised a joint controllership arrangement on an interinstitutional database for the selection of temporary or contract agents (see specific objective 7.3).

2.2.3. Sound environmental management

DGT's longstanding commitment to sound environmental management has placed it at the forefront in the Commission, with DGT winning multiple awards several years in a row. Its best practices will be incorporated in the second edition of the guidelines on organising sustainable meetings and events at the Commission. DGT's Eco-Management and Audit Scheme (EMAS) action plan for 2020-2022 was identified as best practice for other DGs to follow. The overall purpose of DGT's EMAS action plan, in line with the Commission's green

⁽¹⁹⁾ [Data governance and data policies at the European Commission](#).

priorities, is to increase awareness, visibility and staff engagement in environmentally friendly practices at work.

In 2021, due to the extension of remote working for much of the year, DGT **surpassed its objectives** on energy savings, reducing CO₂ emissions from mobility, waste reduction and paper consumption, and completed the following actions from its EMAS action plan:

- Identifying an 'eco-contact person/point' in each directorate and language department.
- Communicating on EMAS matters (e.g. articles on the latest eco-initiatives) and mainstreaming EMAS information on DGT's intranet by including it wherever relevant (e.g. when organising an event, commuting, ordering supplies).
- Encouraging staff to participate in EMAS events by organising local activities (e.g. spring and autumn cleaning trails, sustainable living in Luxembourg).
- Publishing a Green DGTips monthly newsletter.
- Implementing the guidelines on organising sustainable meetings and events at the Commission at all DGT meetings and events (e.g. reducing waste through the policy to ban single-use plastics and not distribute gadgets at conferences and events).

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

DGT has put in place an IT system that automatically creates translation packages for outsourcing, which contain the linguistic resources and information needed by external contractors to carry out their work. Today DGT uses **automatically generated outsourcing packages** in 65% of cases. This approach reduces the workload in language departments and in the outsourcing unit, generates savings on the outsourcing budget and improves the quality of external translations.

DGT also achieved further efficiencies by **transferring the mission management** to PMO (a pilot project, started mid-February 2021 and extended until February 2022) and finalising the **automation of financial analysis and reporting** in June 2021

The DGT Business Continuity Plan received some minor updates, and a more comprehensive update would follow when the COVID-19 pandemic situation stabilises, also taking into the account the aspects related to future working methods.

Finally, DGT enabled extended multilingualism on Europa by integrating eTranslation into Commission's websites and platforms and delivering the platform for the Conference on the Future of Europe. 75 websites were connected to eTranslation to reach out to citizens in their own language with a 'fit for purpose' quality and at minimum marginal costs for the EU budget.