



Internal Oversight Division

Reference: IA 2018-02

Audit Report

Audit of the Language Division

June 18, 2018

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LIST OF ACRONYMS

AIMS	Administrative Integrated Management Systems
AIIC	Association Internationale des Interprètes de Conférences
AITC	Association Internationale des Traducteurs de Conférence or International Association of Conference Translators
CAT	Computer Assisted Translation
CATT	Computer-Assisted Translation and Terminology
CGSD	Conference and General Services Division
ECM	Enterprise Content Management
ERM	Enterprise Risk Management
ICTD	Information and Communication Technology Department
IGC	Intergovernmental Committee on Intellectual Property and Genetic Resources, Traditional Knowledge and Folklore
IOD	Internal Oversight Division
IRCS	Interpreters Recruitment and Contracting System
LDRTxP	Language Division Reference TextBases Project
LDTP	Language Division Terminology Project
MPEP	MultiTrans Prism Externalization Project
PCT	Patent Cooperation Treaty
ProgTrav	Program de Travail
QC	Quality Control
RBM	Result Based Management
SCCR	Standing Committee on Copyright and Related Rights
TCG	Translation Coordination Group
TMX	Translation Memory eXchange
TTT	Terminology and Translation Technology
TWMS	Translation Workflow Management System
UPOV	International Union for the Protection of New Varieties of Plants
WIPO	World Intellectual Property Organization

EXECUTIVE SUMMARY

1. The Policy on Languages at WIPO, adopted at the WIPO General Assembly in 2011, was designed around the objective of extending translation services to the six official languages, including implementing measures to address the anticipated increased workload through effective tools, practices, and efficient management of resources. To date, the key objectives of this policy have been achieved, and going forward, the Language Division needs to establish an operational policy to serve as a guiding principle, reinforced by effective guidelines, procedures and office instructions, to support its strategic objectives. A quality assurance framework and service level agreement/charter to underpin its current quality control practices would also serve the Program's quality objectives.
2. The Director General's decision to consolidate and centralize the support for terminology and translation technology in WIPO under the Patent Cooperation Treaty (PCT) Translation Division, which will establish a Section for that purpose, will require the establishment of a functional mandate for this Section, with clear roles and responsibilities, and adequate resources with the right skillsets, to effectively support the work of the stakeholders (Language Division, PCT Translation Division, and Brands and Designs).
3. Likewise, the decision of the Translation Coordination Group (TCG), chaired by the Director General, to establish a common platform for Terminology Databases that will be shared among PCT, Brands and Designs, and the Language Division, for publishing terminology on the WIPO web site, would require effective cooperation and coordination between the stakeholders to ensure that respective terminology databases can be effectively integrated into a common customer facing platform.
4. The Terminology database of the Language Division is being finalized, and the Project Manager who is also a Translator-Reviser in the Spanish Section of the Language Division will be retiring at the end of June 2018. Consequently, effective measures need to be taken to ensure the orderly transfer of knowledge and handover of the project.
5. Taking appropriate and sustainable measures to address the resource imbalances in the Language Sections and in particular the inefficiencies in the English Section, including developing an effective plan for back-staffing and effective knowledge transfer, would support the Language Division in achieving its key strategic objectives.
6. While the Office Instruction on Interpretation Services for WIPO Meetings and Events, designate the Translation Section as the coordinator for managing interpretation requests for WIPO activities at Headquarters and outside WIPO, IOD notes that a number of Programs have been independently sourcing interpretations for outside events. Going forward, it would be useful to clarify the role of the Interpretation Section with regards to interpretation needs for outside events. Also, IOD's review of Conference and Language Services¹ in 2013 highlighted the need to develop an integrated conference management system including a module for managing interpretation services. This need is still current; and to date, this recommendation is still open, and would need to be addressed.
7. Finally, given the peaks in workload of the Interpretation Section, and its current resource structure, performing periodic analyses of interpretation activities would help determine and budget flexible human resource needs to better support the Section and sustain the quality of interpretations at WIPO.

¹ IA 2012-02

1. BACKGROUND

8. The Language Division is part of Program 27, Conferences and Language Services, with responsibilities that include: the translation into the various official languages, of the treaties and other international instruments administered by WIPO and UPOV² or in preparation, national legislative texts, documents for the Assemblies of Member States, publications, reports of meetings and conferences and working documents for committees of experts and other bodies. In more detail, the Language Division provides translation from and into WIPO's six official working languages (Arabic, Chinese, English, French, Russian and Spanish) of WIPO of the following:

- (a) Working documents for WIPO meetings organized at or away from Headquarters;
- (b) Information circulars, Office Instructions, etc.;
- (c) Official statements, speeches;
- (d) Treaties, laws and other legal texts of Member States;
- (e) Press releases, WIPO Magazine, newsletters, Web pages, etc.;
- (f) Publications, training material, study papers, presentations, etc.; and
- (g) Other material relevant to WIPO activities.

9. The Language Division provides interpretation services for the meetings of the WIPO Assemblies and the WIPO Coordination Committee as well as other meetings organized by the various sectors.

10. Finally, the Division also assists other Programs in drafting original material in the different languages, provides advice on matters of grammar, style and usage, and drafts glossaries of terms used within WIPO.

Table 1: Staffing in the Language Division

Section	Director /Head	Translators/ Interpreters	Assistants /Agency workers	Technical Support	Total
Office of the Director	1	0	2	2	5
Arabic	1	3	1		5
Chinese	1	3	1		5
English	1	1	1		3
French	1	4 ³	2		7
Russian	1	3	1		5
Spanish	1	5	2		8
Interpretation	1	1	0		2
Total	8	20	10	2	40

Source: Organizational Structure - Intranet

² Translation and interpretation services are provided to UPOV as well, which uses four official languages. i.e. English, French, German, and Spanish.

³ Plus two vacant posts, one of which will be filled soon (with the selected incumbent to start on September 1, 2018)

11. There are a total of 40 persons working within the Division, including two agency workers and excluding short-term translators⁴.

Table 2: Budget Report- 2016/2017 (in thousands of Swiss francs)

Department	Account Class	Cost Category Group	Cost Category	Budget	Actuals	Balanc	Util%	
0098--Language Division	Non-Staff Costs	Contract Services	Conferences	618	570	48	92.3%	
			Contractual Services	1,399	1,400	-2	100.1%	
			Individual Contractual	4,408	4,253	155	96.5%	
		Equipment	Furniture & Equipment	0	0	0		
			Supplies & Materials	11	1	10	13.2%	
		General Operating Expenses	Premises & Maintenance	137	112	25	81.5%	
			Representation and Oth Op	0	1	-1		
		Travel& Course	Staff Missions	24	16	8	65.1%	
		Personnel expenditure	Post Staff Expenses	Overtime & Refreshment	0	42	-42	
				Salaries	13,567	8,714	4,854	64.2%
	Staff Benefits			0	3,649	-3,649		
	Temporary Staff		Temporary Staff Benefits	0	235	-235		
			Temporary Staff Overtime	0	8	-8		
			Temporary Staff Salaries	1,293	773	519	59.8%	
Grand Total				21,457	19,774	1,683	92.2%	

Source: Business Intelligence Report

12. The table below summarizes the number and cost of translations for the 2016/2017 biennium, including the ratio of in-house and outsourcing during the same period. Around 31 million words were translated in 2016/2017, with over 18 million words (59 per cent) translated by external individuals and agencies for a total cost of approximately 3,7 million Swiss francs. In-house translation expenditures include 1, 75 million Swiss francs for the use of AITC short term translators.

Table 3: Translations and Related Expenditures - 2016/2017

Headings	Total Words Translated In-house	Total Words Outsourced to Individual Translators	Total Words Outsourced to Agencies	Totals	% In-house	% Outsourced
2016 - Number of Words	6,467,707	5,070,429	3,947,408	15,485,544	42%	58%
2017 - Number of Words	6,240,475	5,370,290	3,838,064	15,448,829	40%	60%
Total 2016/17 - Number of Words	12,708,182	10,440,719	7,785,472	30,934,373	41%	59%
Total Expenditures 2016/17 (Swiss francs)	15,590,319	2,496,441	1,201,759	19,288,519	81%	19%

In-house: Personnel Related Expenditures	13,839,647
In-house: Short term translators Expenditures	1,750,673
Total Expenditures 2016/17 (Swiss francs)	15,590,319

Source: AIMS and Language Division Statistics

⁴ AITC (Association Internationale des Traducteurs de Conférence) translators used to meet increased volumes

13. The table below summarizes the number of contracts issued, and the number of interpretation days, by interpretation language for 2016 and 2017. In total, The Interpretation Section signed 1,995 contracts corresponding to 5,658 interpreter days⁵, and for a total of approximately 4, 4 million Swiss francs⁶ in the 2016/2017 biennium.

Table 4: Interpretations by Language, Contracts and Interpretation Days - 2016/2017

Year	2016		2017	
	N° contracts	N° days	N° contracts	N° days
Spanish	187	498	182	474
Russia	96	287	94	251
French	218	604	201	541
English	246	689	243	637
Chinese	130	408	121	381
Arabic	136	439	130	410
German (UPOV)	6	22	5	17
Total	1019	2947	976	2711

Source: Language Division- Interpretation Section

2. AUDIT OBJECTIVES

14. The objectives of this audit were to assess:

- (a) Effectiveness of Governance, Risk Management and Controls over the management of translation and interpretation services;
- (b) Effective compliance with the language policy, and implementation of cost effective practices;
- (c) Appropriateness of resources and skill-sets to support achievement of the Language Division's objectives and Expected Results; and
- (d) Adequacy of systems and tools used to support the activities of the Language Division.

3. AUDIT SCOPE AND METHODOLOGY

15. The audit scope covered activities of the Language Division undertaken in 2016/2017 biennium. The methodology included:

- (a) Reviewing relevant documentation and interviewing key stakeholders on governance, risk management, and control processes surrounding the activities of the Language Division;
- (b) Reviewing policies, procedures and guidelines in order to assess adequacy and completeness;

⁵ Experienced interpreters are paid 738 Swiss francs/day and less experienced interpreters are paid 443 Swiss francs/day based on agreement with Association Internationale des Interprètes de Conférences (AIIC)

⁶ These expenditures are charged to the individual budgets of Programs that request Interpretation Services

- (c) Assessing overall risk management including reviewing related risk registers;
- (d) Verifying through walkthroughs tests, the effectiveness and efficiency of existing workflows, and related controls, from planning to implementation and reporting of activities of the Division;
- (e) Conducting tests to assess: compliance with the Language Policy, effective practices to optimize costs; and adequacy of quality control of deliverables from the Division;
- (f) Assessing measures taken to ensure adequacy of personnel and skillsets, including relevance and regularity of related trainings; and
- (g) Verifying through tests and interviews, whether systems and tools provide effective support.

16. The audit was performed in accordance with the International Standards for the Professional Practice of Internal Auditing.

4. AUDIT RESULTS - POSITIVE DEVELOPMENTS

17. Various key objectives of the Policy on Languages at WIPO, adopted at the WIPO General Assembly in 2011⁷ have been implemented; notably:

- (a) Covering all six official languages of WIPO;
- (b) Increasing outsourcing to 60 per cent; and
- (c) Increasing reliance on technologies including Computer Assisted Translation (CAT) tools to improve the translation environment (i.e. the finalization of a translation workflow management tool, and a terminology database).

18. While the above measures are positive steps forward, the following observations and recommendations would further help the Language Division meet its objectives and expected results.

⁷ WO/PBC/18/15

5. OBSERVATIONS AND RECOMMENDATIONS

(A) GOVERNANCE

(i) Language Policy of the Language Division

19. The Policy on Languages at WIPO, adopted at the WIPO General Assembly in 2011, was designed around the objective of extending translation services to the six official languages for all meetings of the Main Bodies, Standing Committees and Working Groups, and identified the measures to put in place to address the anticipated increased workloads: These measures included:

- (a) Increasing outsourcing;
- (b) Increasing the use of CAT tools;
- (c) Aligning human and financial resources; and
- (d) Managing the sizes and timelines for submitting documents to be translated.

20. Five years after its establishment, the main objectives of the Policy have been implemented and the ensuing practices, processes and tools are being managed.

21. Going forward, the translation environment at WIPO has evolved, and new strategic directions are being taken, notably in the use of technology, artificial intelligence, as well as the re-structuring of technical support services, and new tools that could affect the translation services, such as: the Translation Workflow Management System, WIPO Translate, Enterprise Content Management (ECM) and the Data Classification tool.

22. Consequently, there is an opportunity to develop an operational Language Policy for the Division that would become the guiding principle that supports the strategic objectives of the Language Division, while considering the changes in the translation environment. This would enable an effective and efficient governance of the services of the Division, including interpretations, supported by fit-for-purpose procedures and guidelines.

(ii) Procedures and Guidelines

23. Policy, procedures and guidelines are important components of internal control in any operational process. However, procedures and guidelines must be useful, relevant and practical in order to be understood and applied.

24. The Language Division has developed a number of procedures and guidelines, to support its operations. Furthermore, individual Language Sections have also developed their own specific procedures and guidelines.

Table 5: Procedures and Guidelines of the Language Division

Subject	Quantity
General procedures, guidelines	38
MultiTrans	72
MyCat	4
SDL Trados	20
Translation Assistant for Patent Titles and Abstracts (TAPTA)	4
Terminology Database	3
Translation Workflow Management System (TWMS)	4
Winscribe	61
Dragon Naturally Speaking	1
Translation Memory eXchange (TMX)	1
Others (i.e. Section related guidelines)	45
Total	253

Source: Language Division data

25. In all, there are approximately 253 documents relating to procedures and guidelines covering the workflow, systems and tools used in the Language Division. While acknowledging the extensive number of documentation available, such large and diverse number of documentation may not efficiently support and encourage users.

26. The Terminology Database Project Manager initiated the documentation of processes and tasks to reinforce knowledge management and business continuity; this includes among others, reorganizing workspaces, WIKI⁸, Procedures, guidelines, etc. Within this context, it would be relevant to review the utility and streamline these documents with a view to identifying and developing more concise, user friendly and relevant procedures and guidelines that would be useful and effectively support operations and safeguard knowledge and business continuity.

(iii) Office Instruction - Translation Services

27. The Office Instruction on the Translation of Official WIPO Documentation issued in 2012 (No. 32/2012) needs to be reviewed and updated to better reflect: changes in processes and tools; changes in operational practices based on lessons learned throughout the implementation process of the Policy on Languages; and structural and organizational changes such as External Offices.

28. Furthermore, a set of metrics outlined in the Office Instruction, such as the need to timely provide translation forecasts are not delivering the right results. A review of translation forecasting data shows that only 16 Programs provided some forecasted translations at the beginning of 2017, and as shown in the table below.

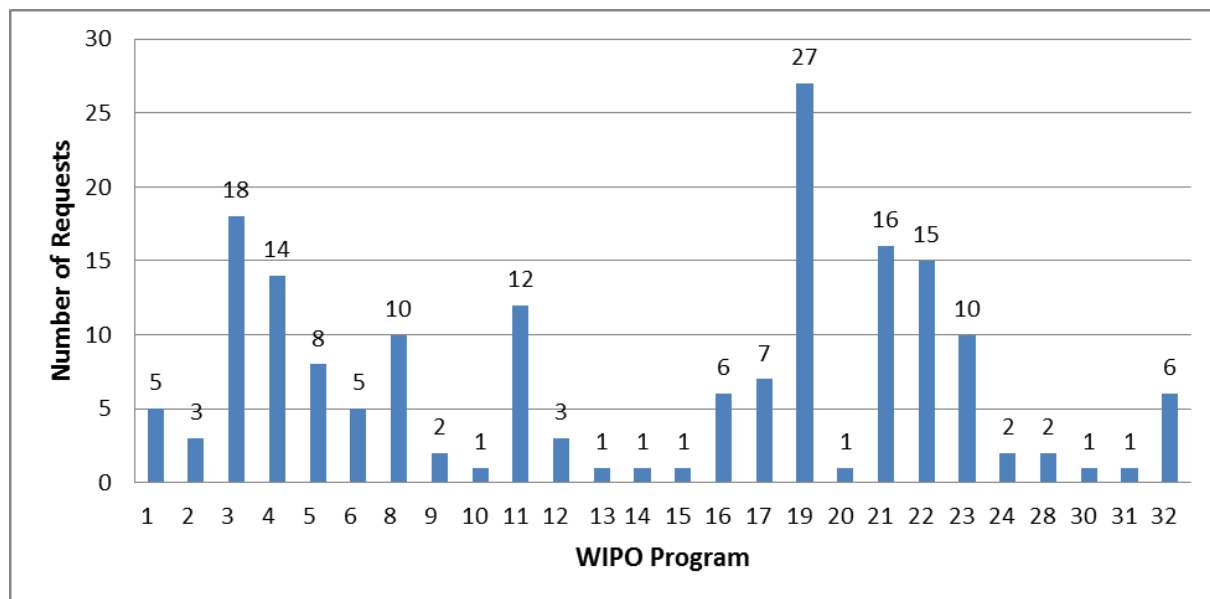
⁸ A website or database developed collaboratively by a community of users, allowing any user to add and edit content.

Table 6: Translation Forecasts in 2017 by Program

Program	Estimated Volumes	Program	Estimated Volumes
1	47,900	12	106,160
2	48,950	17	82,430
3	110,650	19	1,000
4	206,400	21	32,000
5	210,300	22	354,220
6	66,850	23	52,500
7	2,200	26	17,050
8	235,450	32	7,500
Total	928,700	Total	652,860
Grand Total	1,581,560		
Total translations 2017	15,448,829		
Percentage forecasted	10%		

Source: Language Division data

29. Consequently, only 10 per cent of translation volumes were forecasted in 2017 and further drill down of the data shows that:
- The actual translation volumes requested, exceeded the forecasted volumes for 33% of cases;
 - Twenty-one per cent of actual translation volumes were over 100% more than forecasted translation volumes; and
 - Seventeen per cent of the actual translation volumes were between 40% and 100% more than forecasted volumes.
30. The Office Instruction also states that working documents to be translated “*must be submitted to the Language Division sufficiently early, for the translation to be scheduled and completed in time for dispatch to Member States at least two months before the meeting, as stipulated in the WIPO General Rules of Procedure*”.
31. In practice however, the Division has not established a means of measuring this metric and relies on the Conference and General Services Division to provide data on timely publication of documents for Committees and Working Groups. This metric shows that in 2017, 49 per cent of all documents were published in all languages, two months before the relevant meetings; hence there is room for improvement.
32. Finally, the Office Instruction also indicates that: “*Timely submission of requests for translation will be beneficial both to the originators of the requests and to the Language Division. It will also enable costs to be controlled and contained*”. However in practice the Language Division is faced with recurring late request from Programs. The figure below depicts late requests by Program based on 1500 words translated per day compared to the request date and deadlines.
33. A last-minute translation request is a request for which:
- Submission and delivery dates are the same;
 - Delivery date is too tight compared to the volume of words to be translated; and
 - Notice is too short regardless of the volume of words to be translated.

Figure A: Number of Last Minute Translation Requests by Program (Total 178)

Source: Language Division – translation Management Tool (ProgTrav)

34. Going forward, it would be beneficial for the Language Division to develop a more effective method for capturing forecasts; for instance by requesting forecasts on a quarterly basis, in order to better plan and manage resources; and explore possibilities through the new translation management tool, to develop a method for measuring submission timelines, to regularly report on Programs who recurrently request for last minute translations.

(iv) Quality Assurance Framework – Translation Services

35. The move to outsource translation work at a 60/40 ratio, and the introduction of various technologies to aid translation, requires the establishment of a robust quality framework. While acknowledging that the Language Division conducts quality control in its translation workflow, IOD notes that there is no clear formal Assurance Framework that underpins the quality control mechanisms in place. Currently, each Language Section has implemented its own varied practices such as:

- (a) Some Sections fill a quality control sheet, while others do not;
- (b) Reliance on CAT tools for quality control, varies in manner and frequency among the Sections;
- (c) Some Sections provide constant feedback, while others provide end of year feedback, or feedback upon request; and
- (d) Some Sections quality review the whole document, while others cover a certain percentage of the document, based on time constraints among others.

36. Further, there is no quality charter/service level agreement with quality targets that guide quality within the Division. While acknowledging that factors such as experience of external translators, complexity and size of documents, among others, should drive the level of quality control to be performed, these elements should be part of a framework upon which each Section can flexibly design and apply quality control practices in a consistent and reliable manner.

37. Though emphasis is placed on technology, all Sections of the Division do not equally benefit from efficiency gains to be derived from the quality control features (e. g. Target is identical to source, Inconsistencies, Duplicates, Missing terminology) of the existing CAT tools, that can assist in enhancing consistency, efficiency and effectiveness of quality control practices. This is because some Sections have bought-in to the process and are more advanced in the use of the tools, while other Sections have indicated time constraints and limited knowledge of the tools as some reasons for lower buy-in.

38. The Language division would benefit from establishing a formal Quality Assurance Framework, including a charter/service level agreement with clear performance targets that can be used to: ensure that a standard quality level is achieved by each Section, and assess usefulness of, and measure benefits derived from the various investments made in CAT tools for supporting quality assurance.

Recommendations

1. The Language Division should develop an operational Language Policy to serve as guiding principles for translation services; review and streamline existing procedures and guidelines with a view to make these, more concise, user friendly and relevant, in order to effectively support operations and safeguard knowledge and business continuity. (Priority: High)

2. The Language Division should update the Office Instruction on the Translation of Official WIPO Documentation to better reflect changes in the business process and environment, including:

(a) Developing a more effective method for capturing translation forecasts; for instance by requesting forecasts on a quarterly basis, in order to better plan and manage resources; and

(b) Exploring possibilities through the new translation workflow management system, to develop a method for measuring submission timelines, in order to regularly report on Programs which recurrently request for last minute translations.

(Priority: Medium)

3. The Language Division should develop a Quality Assurance Framework including a service level agreement/charter that defines quality expectations, while considering factors such as experience of external translators, complexity and size of documents and that incorporates the various tools available to support quality control. (Priority: Medium)

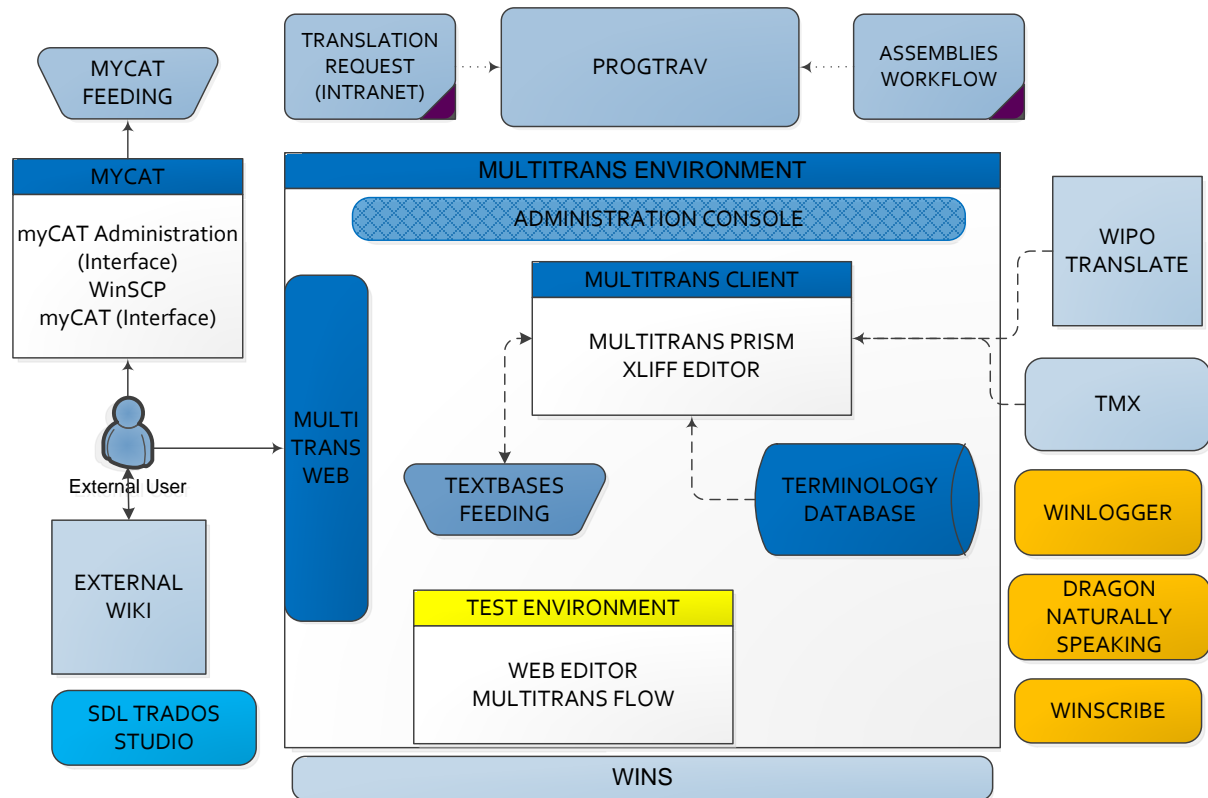
(B) TOOLS AND SYSTEMS

(i) Managing Technical Support Services for the Language Division

39. An effective and efficient support service is one of the key enablers for achieving the strategic objectives of the Language Division. The current technology environment is made up of various systems and tools to support the Division in performing their work in an effective and efficient manner while managing resources and ensuring quality of deliverables.

40. Support requests are mainly related to the use of translation applications and Computer-Assisted Translation and Terminology (CATT) tools such as MultiTrans products, as well as other tools used to support the work of translators, such as: External Wiki, MyCAT, Winscribe, Assemblies workflow, Dragon Naturally Speaking, SDL Trados Studio, WIPO Translate, Translation Memory Exchange (TMX), and Wins among others.

Figure C: Translation Technology Environment of the Language Division



41. The support unit of the Language Division provides application and system support, including: deployment, packaging, installation, migration, roll-up and externalization of services, database maintenance and backup, licensing management, accounts management, and user assistance on applications performance and connection. Furthermore, the support unit also provides operational support such as: Functional support for applications, applications analysis, Business management, and business development.

42. The strategy of the Language Division for providing efficient and effective language services (hereinafter referred to as “strategy paper”) forecasted the need for a support unit with one Support Specialist, one Terminologist, and an Associate Terminologist to effectively support the work of the Division. Currently, the unit has one Specialist whose performance according to management, has been below expectations, and who has been regularly absent. Furthermore, there is no Terminologist as planned, and the P1 Associate Terminologist position which has been held by five different persons between 2013 and 2017, is back staffing the Support Specialist, and the contract of the current incumbent will terminate end 2018. The Language Division has also allocated various other technical support tasks to a number of staff with diverse expertise within the different Sections.

43. While acknowledging that this approach would enhance the skills and technical knowledge of staff members involved, effectiveness and efficiency of this practice would require appropriate measures that include: adequate training, assessment of workload capacity, and realignment of job descriptions and duties.

44. Finally, the above conditions highlight risks relating to: misalignment between current human resources in technical support and the strategy paper of the Language Division, and temporary nature of key support resources such as the Associate Terminologist position.

(ii) Centralized Support for Terminology and Translation Technology

45. The Director General has decided to consolidate and centralize the support for terminology and translation technology in WIPO under the PCT Translation Division, which will consolidate this support by creating a Translation and Terminology Technology Section and an existing Terminology Unit in the Support Section of the Division.

46. Interviews with the PCT, the Language Division, and Brands and Designs management, and consultation of memoranda from the Administrative and Management and the Brands and Designs Sectors to the Director General on the proposed consolidation, indicate that each translation business will maintain responsibility for their respective applications, and workflow management in this new architecture. Furthermore, there will be a Board established, with Terms of References, and made up of the three directors of the different translation services concerned. The Board will direct resources, identify synergies, and ensure that translation services are made efficient through consistent use of technologies within the Organization, avoiding duplication of effort where possible.

47. While acknowledging this relevant step towards better harmonization, knowledge sharing, and ultimately efficiency, IOD would emphasize that at these early stages, roles, reporting lines, and accountability are set in such a manner to ensure that the Terminology and Translation Technology (TTT) Section functions efficiently, and business needs of each translation service are addressed effectively in a timely manner.

48. There is an opportunity to conduct full needs assessment aligned with current and future states of technology in each business area, with a view to determining the right support structure and services, while considering the various tools that make up the IT landscape in each business area. This would also help identify tasks that can be outsourced to the TTT Section, and tasks that could be maintained within the individual translation services for more efficiency. The TTT Section can then ensure that it supports the needs for each area as effectively as possible with respect to support for applications, application analysis, and development tasks.

49. With regards to the Language Division, measures also need to be taken to ensure that ongoing projects (e.g. Language Division Terminology Project (LDTP), MultiTrans Prism Externalization Project (MPEP), Language Division Reference TextBases Project – (LDRTxP)), are managed and would be maintained effectively.

50. Failing to align the TTT Section's tasks and duties with the business needs and projects of the Language Division and other stakeholders, would impact operational effectiveness and achievement of business objectives.

(iii) The Terminology Database of the Language Division

51. The Translation Coordination Group (TCG), chaired by the Director General, had requested that a common platform for Terminology Databases be shared among PCT, Brands and Designs, and the Language Division, for publishing terminology on the WIPO web site.

52. Currently, each business area has developed its own Terminology Database, and the database of the LDTP expected to be closed by the end of June 2018. Furthermore, the Project Manager who is also a fixed term staff member of the Spanish Section will be retiring at the end of June 2018.

53. IOD further notes that the consolidation of the Translation and Terminology Technologies under the PCT, may impact the management and maintenance of the Language Division's Terminology Database, and would require both the allocation of a knowledgeable support staff, and a robust management and support process with clear roles and responsibilities, to ensure that the tool is delivering the expected benefits.

54. Furthermore, the Terminology Databases of the Language Division, PCT Translation Division and Brands and Design Sector, would need to be interoperable and integrated, to align with the decision of the TCG to establish a common customer facing platform for WIPO Terminology Databases; this task is still pending, and tests would need to be performed to assess interoperability and integration.

55. Given the critical function of the Terminology Database, addressing the above conditions and specifically, ensuring that the current Project Manager has sufficient time to transfer knowledge and handover the project, would help mitigate related risks and minimize any adverse effect on both the operations of the Language Division and effective management and maintenance of the Terminology Database.

(iv) The Translation Workflow Management System

56. The Language Division began developing a Translation Workflow Management System (TWMS) as part of the Enterprise Content Management initiatives at WIPO. The objective was to replace the existing bespoke tool (ProgTrav) which is an Excel-based and heavily manual workflow no longer aligned with the needs of the Division, and introduce new functionalities (i.e. reporting, dashboards, and statistics) that would enhance the overall efficiency and effectiveness of the translation workflow and knowledge management.

57. The initial plan was to complete the project by October 2017; however there were delays due to technical issues relating to the ECM project notably, the time required for upgrading the content server, and the departure of the Business Analyst and time required to find a replacement.

58. At the time of the writing of this report, the TWMS is running in parallel with the existing system in the Language Division, and a full organizational roll-out was performed at the end of May 2018.

59. While acknowledging that the new system would enhance: workflow management, allocation of tasks, monitoring, reporting and content management, IOD observes that although 60 percent of translation is outsourced, the TWMS is not available to external translators; hence external workflow does not fully benefit from the new system.

60. Identifying effective means to include external translators in the workflow, subject to adequate information security considerations, would further enhance the effectiveness and efficiency of translation management and harmonize the management of external translators.

Recommendations

4. The Language Division should work with the Patent Cooperation Treaty (PCT) and the Brands and Designs sector to ensure that Terminology and Translation Technology (TTT) Section is designed to address the current and future business needs of all entities involved, and in particular the Language Division, including:

- (a) Establishing a mandate, defining clear roles, responsibilities and accountability, as well as reporting lines for the TTT Section;
- (b) Ensuring that human resources are sufficient in number and skillset to address the current and future business needs of the Language Division; and
- (c) Differentiating applications, systems, and operational support tasks that would be outsourced to the TTT Section, and those that would remain within the Language Division, and consider establishing a focal point to liaise between the TTT Section and the Division.

(Priority: High)

5. The Language Division should work with the PCT and the Brands and Designs sector to:

- (a) Effectively operate and maintain the Language Division's Terminology Database in Production, including allocating a knowledgeable support staff, and assigning the appropriate roles and responsibilities; and
- (b) Integrate the Language Division Terminology Database into a common customer facing platform with those of the PCT and the Brands and Designs sector.

(Priority: High)

6. The Language Division should take appropriate measures to ensure the orderly transfer of knowledge and handover of the Terminology Database project.

(Priority: High)

7. The Language Division should identify means to include external translators within the Translation Workflow Management System, subject to adequate information security considerations. (Priority: Medium)

(C) OPERATIONAL AND PERFORMANCE MANAGEMENT**(i) Performance Indicators of the Language Division**

61. The review of the relevance and alignment of Performance Indicators of the Language Division with the strategy paper of the Division shows that while the strategy paper focuses on quality, timeliness, and effective use of resources and technology, there is only one indicator (cost per word of translation) developed to measure achievement of these key strategic objectives; consequently, there are no indicators to measure:

- (a) Quality of work;
- (b) Timeliness of work; and
- (c) Efficient use of resources and technology.

62. The Language Division currently measures quality of services through Member States surveys conducted by the Conference and General Services Division, and timeliness is partly assessed through the performance indicator of the above mention Division, which measures timeliness of publications. However, the responses from these surveys are not reported hence not effectively utilized by the Language Division because there is no indicator against which to report the results. Also, assessing timeliness of publication is not specific to the Language Division, and does not fully measure timeliness of the work of translators.

63. Going forward, the Language Division would benefit from developing fit-for-purpose performance indicators for translation services, to support the already existing data on Member States feedback on quality, and establish an internal customer survey to further support measuring all stakeholders' feedback on the quality of translation services. Further, establishing a performance indicator to specifically measure timeliness would provide valuable data to assess the effectiveness of the current practices, and systems in place to enhance efficiency of translation work.

(ii) Risk Management in Translation Services

64. Proactive risk management is a key enabler for effective and efficient management of the operations of the Language Division. A review of WIPO's Enterprise Risk Management (ERM) system shows that the risk register of the Language Division can be further enhanced.

65. The risk register of the Division currently holds two risks related to translation services-Multilingualism is compromised due to non-compliance with the WIPO Language Policy; and inadequate implementation of the Language Policy due to increasing requests for translation and non-adherence to prescribed limits, translation workloads mount significantly, leading to budgetary imbalances.

66. While acknowledging the relevance of the above risks, there are additional risks that affect both the strategic objectives and Expected Results of the Division; notably, customer oriented services, risks related to technology driving the business needs, effective technical support services aligned with technology strategy, and timeliness and quality of deliverables.

67. For instance, timeliness and quality of the work of external translators which make-up, along with technology, the backbone of the Language Division's strategy paper for resource optimization and cost efficiency in providing translation services. Also, the use of technology to better support translation and the extension of the translation environment would highlight additional risks relating to technical support among others.

68. Identifying key risks related to the achievement of the strategic objectives of translation services, would better support and provide assurance that the Language Division is aware and active in mitigating risks that could otherwise impact effective and efficient management, and achievement of the Program's Expected Results.

Recommendations

8. The Language Division should:

- (a) Develop fit-for-purpose performance indicators, to address the key objectives defined in the strategy paper, and aligned with the Expected Results, as well as develop tools to capture and report on these indicators (i.e. establishing an internal customer survey), in order to better monitor and measure achievements; and
- (b) Identify key risks that arise from the evolving translation environment, and could impair achievement of the objectives outlined in the strategy paper.

(Priority: Medium)

(D) HUMAN RESOURCES

(i) Language Sections

69. The strategy paper of the Language Division places emphasis on supporting in-house translation workloads with the use of AITC⁹ short-term translators. For that purpose, an estimation of the needs of each Language Section is determined at the beginning of the year and can subsequently be refined based on the evolution of translation forecasts.

70. The Language Division spent over 900 thousands Swiss francs on AITC short-term translators in 2017 representing around 404 weeks of work allocated as follows:

Table 7: Number of Weeks of AITC Translators used in 2017 per Language Section

Section	Allocated Weeks of AITC Short Term Translators
Arabic	80
Chinese	50
English	30
French	95
Russian	55
Spanish	94
Total	404

71. Using 2017 data provided by the Language Division, IOD performed a global analysis of in-house translation workloads, including quality control of outsourced translations, against internal staff and AITC translators, in order to assess capacity to manage the workload.

72. The following assumptions were made in performing the analysis:

- (a) Head of Sections allocate 20 per cent of their time for translation and quality review;
- (b) AITC translation weeks are converted into units of staff on the basis of 220 working days a year;

⁹ Association Internationale des Traducteurs de Conférence (AITC) provides translators for short-term assignments

- (c) The Translator/Reviser of the Spanish Section is not included in the total number of in-house translators for that Section because she was engaged fulltime in managing the Terminology Database project, hence, extra AITC weeks were allocated to fill the gap;
- (d) Likewise, in 2017, the Translator/Reviser of the Arabic Section worked 50 per cent of their time on the project for developing a translation management tool, and extra AITC weeks were allocated to cover those periods; therefore this staff was included at 50 percent in the analysis.
- (e) Quality Control (QC) days are calculated based on the Language Division standards (Revision-3750 words/day; Reviewing-5000 words/day; and Proofreading-10000 words/day), and it is assumed that in-house translators perform QC of outsourced translation work;
- (f) The figures for translation words are net of pre-translation work performed using CAT tools; and
- (g) The analysis does not include other tasks performed by translators, such as administrative and outsourcing management work, support, as well as work related to updating the Terminology Database.

Table 8: Total Days of Translation and Quality Control per In-house Translator Including AITC Translators

Section	Total Translators (Including Heads at 20%)	Total Translators and AITC	Total Words Translated and QC of Outsourced Translation	Days of Translations per Translator	Days of Translations per Translator Including AITC	Days of QC per Translator	Total Days of Translation and QC per Translator	Total Days of Translation and QC per Translator Including AITC
	(a)	(c)	(g)=(d)+(l)	(g)	(h)	(p)	(r)=(g)+(p)	(s)=(h)+(p)
Arabic	2.7	4.5	3,435,666	249	149	112	360	261
Chinese	3.2	4.3	2,099,535	195	144	49	244	193
English	1.2	1.9	540,746	140	89	63	202	152
French	4.2	6.4	4,058,911	272	179	71	343	250
Russian	3.2	4.5	1,786,234	215	154	27	241	181
Spanish	4.2	6.3	3,669,879	207	137	108	314	245
TOTAL	19	28	15,590,971	1,277	853	429	1,706	1,282

Source: Language Division data

73. The above table summarizes the main results and more detailed tables can be found under Annex I. Using a 220 days/year, the results show that all else being equal, some Sections are nearing overload¹⁰, with the Arabic, French, and Spanish, Sections clearly above 220 days/year. Furthermore, if the analysis were to include time allocated for other tasks relating to managing outsourcing, administration, the terminology database, and providing support, the majority, if not all Sections, would be considered overloaded. The current conditions also highlight the need for contingencies and back-staffing in certain Sections.

74. The Language Division is currently recruiting to fill a vacant fixed term post in the French Section, and replace the staff in the Spanish Section who is also the Terminology Database project manager, scheduled to retire at the end of June 2018. The Translation Workflow Management System project is being finalized, which will enable the project manager who is also a translator/reviser to return to fulltime in the Arabic Section.

¹⁰ Days of translation and QC per translator including AITC short-term translators above 220 day/year. It is also to be noted that translators are also required to perform terminology and other related tasks

75. IOD notes that while the current approach of using AITC translators fills the gap in certain cases, discussions with Heads of Sections indicate that this approach has an impact on effective knowledge management since 32 per cent of the in-house work force is short term (nine staff equivalent AITC translators and 19 in-house translators (9/28)). Furthermore, an increase in workload will affect efficiency of QC, which is performed by internal staff members.

76. Consequently, the limited resources, and current practice of using AITC translators would require establishing among others, effective CAT tools, including a relevant and well-managed Terminology Database, fit-for-purpose procedures and guidelines, and a robust support process to ensure that translation activities operate in an effective and efficient manner.

77. While several recommendations made in this report will help address the above, due care should be exercised to ensure that each Section has adequate resources in staffing and skillsets to effectively perform a variety of tasks, while maintaining equitable volumes of translation work; and measures be taken to address imbalances within Sections, as well as catering for contingencies and back-staffing. For instance, the following conditions exist in the English Section, which needs to be addressed:

- (a) Staff Performance issues have resulted in bottlenecks, and concentration of work on the Head of the Section. For instance, the Translator/Reviser has been involved in other activities, and resumed full time work for the Section in April 2017; in effect, they have only contributed to around 10 percent (25,026/251,808 words)¹¹ of work done by the Section in 2017; and
- (b) Although the Section uses outsourcing and AITC short-term personnel, it suffers from lack of continuity and availability of knowledgeable translators. Furthermore, it also lacks in-house staffing to cover quality risks related to outsourcing, and cannot use an AITC translator for a sustained period of time sufficient to develop their skills and familiarity with WIPO's terminology and practices; hence the underlying principle of quality at source is challenged.

78. Finally, the English Section has three posts (one Head, one Translator-reviser, and one Assistant), and there have been three different temporary agency workers used on the Assistant post between October 2017 and March 2018, which has also impacted effective operations and knowledge management.

79. Going forward, ensuring that the mix of in-house, outsourcing, and use of short term translators, is aligned with the specificities of each Language Section, market environment, internal skillsets, and business objectives; including appropriate measure in place to address contingencies and back staffing, would help balance quality, output, workforce, and costs.

Recommendations

9. The Language Division should take appropriate and sustainable measures to address the resource imbalances in the Language Sections and in particular the inefficiencies in the English Section, including developing an effective plan for back-staffing and effective knowledge transfer. (Priority: Medium)

¹¹ The English Section translated 251,808 words in-house in 2017

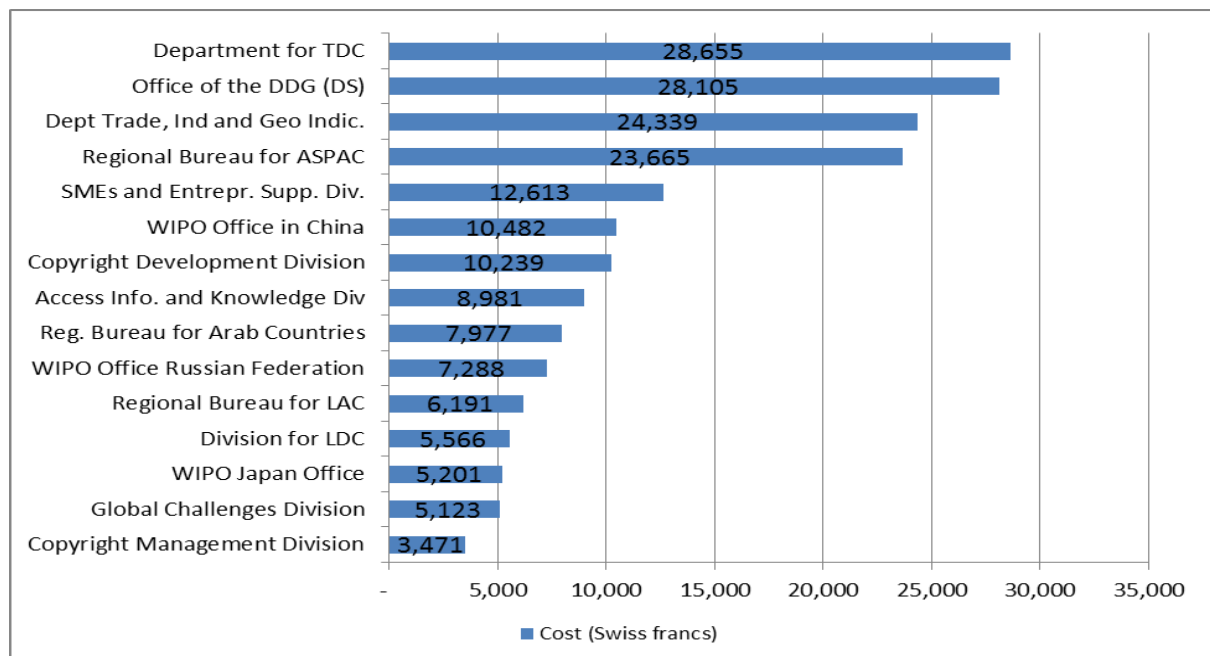
(E) THE INTERPRETATION SECTION OF THE LANGUAGE DIVISION

(i) Office Instruction of the Interpretation Section

80. While an Office Instruction (37/2013) on Interpretation Services for WIPO Meetings and Events, published on September 2013, outlines the policy and procedures for providing interpretation services, and covers meetings and events at WIPO Headquarters and other locations, a recent Office Instruction (11/2018) on WIPO's Policy on Meetings and Official Hospitality also makes mention of interpretation services within the context of WIPO's contribution towards conference facilities for co-organized meeting or events held outside of Headquarters.

81. A review of expenditures for interpretation services in 2017 indicate that 8 per cent of interpretation costs (204,408 Swiss francs) were directly sourced by Program/Units for co-organized events taking place outside of Headquarters, with the top 15 users depicted below.

Figure B: Top 15 Units directly Sourcing Interpretation Service for Events outside WIPO (for a total of 204,484 Swiss Francs)



Source: AIMS report

82. As it currently stands, it is not clear whether the Interpretation Section is to be involved in managing the provision of interpretation services for these co-organized outside events. Furthermore, WIPO is part of the Agreement between the UN Common System and the Association Internationale des Interprètes de Conférences (AIIC) which sets interpretation daily rates; and no assessment has been conducted to: verify whether the use of interpretation under the above described conditions fall under the AIIC Agreement, or assess whether economies could be gained if the Agreement is applied when sourcing interpreters for these co-organized outside events.

83. Going forward, it would be useful to clarify through an update of the existing Office Instruction, the role of the Interpretation Section in supporting interpretation services for WIPO co-organized events held outside Headquarters and assess the cost benefit of sourcing interpreters for these events through the AIIC Agreement.

84. The current Office Instruction on interpretation services also states that requests for interpretation must ideally be made as early as six months in order to secure interpreters since availability is scarce. In practice, this measure has not been effective since the official list of WIPO meetings for a given year is made available around November of the previous year, with the first meetings being scheduled to take place by February. Further, a review of the interpretation calendar show that the six months rule is not regularly applied, and as a result, it is a challenge to locally secure the right language mix for interpretation work.

85. Identifying a method to further enforce the six months rule, would assist the Interpretation Section to efficiently and effectively perform their work, while avoiding increased costs associated to hiring interpreters from abroad.

(ii) Performance and Risk Management

86. Member States feedback on the quality of interpretations is captured in the survey conducted by the Conference and General Services Division. However, the result is not reported because there is currently no performance indicator against which to report the results. This is because, while the Interpretation Section is part of WIPO's Result Based Management (RBM) framework, the Program and Budget document does not currently hold any performance indicators linking services of the Interpretation Section to the corresponding Expected Result of the Program.

87. The absence of appropriate indicators would prevent effective measure of the contribution of the Interpretation Section's activities to the achievement of the Expected Results of the Language Division; hence limiting integration of Interpretation activities in the Organization's RBM framework.

88. Likewise, there are no risks related to the services provided by the Interpretation Section in the risk register of the Division; hence this Section's activities are isolated from the risk management process.

89. Identifying key risks related to the achievement of the objectives of the Interpretation Section, would better support and provide assurance on awareness and active mitigation of risks that could otherwise impact effective and efficient management, and achievement of the objectives of the Section.

(iii) Interpretation Management System

90. Currently, requests for interpretation are made through emails or phone calls, and the Interpretation Section uses the Interpreter Recruitment and Contracting System (IRCS) built on Microsoft Access[®], to prepare and manage interpretation contracts.

91. Furthermore, the Interpretation Section has developed Excel spreadsheets to manage and monitor among others:

- (a) Calendar/plan of meetings;
- (b) Scheduling interpreters;
- (c) Assessing estimated costs and actual costs from AIMS;
- (d) Listing of requisitions;
- (e) Reconciling pay slips with costs;

- (f) Calculating Interpreter days;
- (g) Recording special events; and
- (h) Preparing Attestation/Certificates.

92. The extensive use of spreadsheets increases the risk of errors and omissions, and could lead to inefficiencies, (i.e. time consuming), given the size of the Section.

93. While business requirements for a customized tool for managing interpretation have been captured within the context of the Integrated Conference Services Platform to be developed under the ERP Project Portfolio, IOD notes that no decision has been taken about initiating the development of this platform.

94. Developing an integrated system that takes into account a fit-for-purpose tool for interpretation management, aligned with the conference services and WIPO financial management tool (Administrative Integrated Management System (AIMS)) would enhance the overall efficiency and effectiveness of interpretation services.

95. Finally, the interpretation services would benefit from consulting the Business Intelligence team with a view to developing dashboards that reconcile and present pertinent information from relevant systems in AIMS, in order to reduce the number of excel sheets used for analyses, while enhancing efficiency and reducing the risk of errors.

(iv) Operational Efficiency in Interpretation Section

96. The review of interpretation services to assess effective and efficient management shows that for the most part, meetings requiring interpretation are managed in a cost effective manner, while considering the inherent risks relating to unforeseen extended timelines. Because interpreters are paid on a daily rate, it is crucial that planning be effective, and changes be anticipated, in order to ensure efficient use of funds.

97. The table below shows instance of the types of “overflows” (foreseen and unforeseen situations that require additional interpretation) that could impact efficient management of interpretation services including related costs, and the consequences of these conditions.

Condition/Event	Cause	Consequence
Unplanned overflow, managed with existing team - International Conference on Resale rights (April 28, 2017)	Time schedule for the meeting was not respected.	14 extra interpreter days paid by the Program
Unplanned overflow, managed with existing team - SCCR/34 (May 1 to 5, 2017)	Interpreters were asked to remain after 18h00 on the last day of the meeting	8 extra interpreter days for late work on last day
Unplanned overflow, where extra interpreters were hired - CC/72 (September 12, 2016):	Meeting went on non-stop past 16h00 without a break.	An extra team of interpreters hired and existing team paid for extra time
Unplanned overflow, which could not be covered by interpreters - PCT WG/10 + PCT/30 (May 8 to 12, 2017):	Unforeseen additional late hours (up to 20h00) needed and Interpretation Section given one hour notice to find a relief team. This was not possible, and existing team could only work up until 18h30.	The meeting was stopped at 18h30 and could not continue.
Planned overflow which did not occur - IGC/34 (June 12 to 16, 2017):	Extended Plenary was planned for Wednesday June 14th; however Member States decided to continue with informal meetings with interpretation in three languages instead of six.	Interpreters paid for the day but not fully utilized as planned.

Planned overflow which took place - Global Digital Content Marketplace Conference (21-22 April 2016):	Change of dates announced well in advance as well as extended program.	No impact because of good overall planning
Planned overflow which took place - SCP/25 (12-15 Dec 2016):	Anticipated late start of Plenary and late session on last day.	No extra costs since conditions were foreseen when hiring interpreters

98. Overall, except for one case (International Conference on Resale rights - April 28, 2017) which required an additional budget of 10,379 Swiss francs, extra interpretation cost incurred for cases reviewed, were covered within the initial forecasted budgets because of the prudent approach applied during planning.

99. IOD encourages the Interpretation Section to continue to engage with Programs as early as possible in planning needs, forecasting and anticipating potential events that could result in additional interpretation costs.

(v) Human Resource Management in the Interpretation Section

100. The current strategy paper of the Language Division does not cater for human resource needs in the Interpretation Section which currently has two posts: Head (P5) and Interpreter (P3). The table below summarizes the number of meetings, contracts and interpreter days managed by the Section in 2016 and 2017.

Table 9: Number of Meetings, Contracts, and Interpreter Days in 2016/ 2017

Heading	2016	2017
Number of Meetings	84	84
Number of Contracts	1019	976
Number of Interpreter Days	2947	2711

101. IOD notes that while the table above indicates the number of meetings held in 2017 to be 84, it does not account for the number of sub-meetings and sessions that take place during principal committees and bodies, as well as working groups and expert groups meetings. In fact, out of 24 principal committees, and working group meetings organized in 2017, there were at least 14 meetings with a large number of sub-meetings requiring interpretation services.

102. For instance, a review of the organization of interpretation services for the Intergovernmental Committee on Intellectual Property and Genetic Resources, Traditional Knowledge and Folklore (IGC) and the Standing Committee on Copyright and Related Rights (SCCR) meetings, show that each event includes over 30 sub-meetings/sessions, thus significantly increasing both the number meetings with interpretation needs in real terms, and the administrative load associated with these meetings.

103. The Interpretation Section would benefit from performing an analysis to assess trends of meetings and sub-meetings, volume of needs, against existing resources, in order to determine flexible resource needs to address among others, peak periods; and avoid any risks on the quality of services provided which could impact the reputation of the Organization.

Recommendations¹²

10. The Language Division should review and update the Office Instruction on Interpretation Services for WIPO Meetings and Events, including: (i) clarifying the role of the Interpretation Section in supporting interpretation services for WIPO co-organized events held outside Headquarters; and (ii) developing a process to measure and report on Program's compliance with the six month rule for requesting Interpretation. (Priority: Medium)

11. The Language Division should: (i) work with Information and Communication Technology Department (ICTD) and the Conference and General Services Division (CGSD) to ensure that a customized Interpretation Management tool is developed within the context of the Integrated Conference Services Platform project, the ECM or other projects; and (ii) Consult the Business Intelligence team with a view to developing dashboards that reconcile and present relevant information with regard to interpretation services from various systems including AIMS, in order to replace the current use of excel sheets for analyses. (Priority: Medium)

12. The Language Division should: (i) develop performance indicators for interpretation services, aligned with the Expected Results; for instance an indicator to report on the currently available data on Member States feedback on interpretation services; and (ii) identify and manage key risks related to Interpretation services in the Enterprise Risk Management system. (Priority: Medium)

13. The Language Division should implement periodic analyses of interpretation activities, with a view to assessing meeting trends, volume of needs, and workloads, in order to budget flexible human resource needs, to support the Section. (Priority: Medium)

ACKNOWLEDGMENT

IOD wishes to thank all relevant members of staff for their assistance, cooperation and interest during this assignment.

Prepared by: Alain Garba

Reviewed and Approved by: Rajesh Singh

¹² Recommendations 10, 11, 12, and 13 will be merged with similar recommendations made on translation services for better efficiency in the implementation process. The resulting nine recommendations are listed under the section "Table of Recommendations"

TABLE OF RECOMMENDATIONS

Recommendations on interpretation services (Recommendations 10, 11, 12, and 13) have been merged with similar recommendations made on translation services for better efficiency in the implementation process. As a result, the total number of recommendations is nine; listed below.

No	Recommendations	Priority	Person(s) Responsible	Other Stakeholders	Management Comments and Action Plan	Deadline
1.	The Language Division should develop an operational language policy to serve as guiding principles for translation services; review and streamline existing procedures and guidelines with a view to make these, more concise, user friendly and relevant, in order to effectively support operations and safeguard knowledge and business continuity. (Priority: High)	High	L. Fan		An operational language policy will be developed	Dec 2018
2.	The Language Division should: <ul style="list-style-type: none"> (a) Update the Office Instruction on the Translation of Official WIPO Documentation to better reflect changes in the business process and environment, including: <ul style="list-style-type: none"> (i) Developing a more effective method for capturing translation forecasts; for instance by requesting forecasts on a quarterly basis, in order to better plan and manage resources; and (ii) Exploring possibilities through the new translation workflow management system, to develop a method for measuring submission timelines, in order to regularly report on Programs which recurrently request for last minute translations. (b) Review and update the Office Instruction on Interpretation Services for WIPO Meetings and Events, 	Medium	L. Fan L. Fan L. Fan/	G. Beaver	(a) Current OI on the Translation of Official WIPO Documentation will be updated (i) and (ii) The new translation workflow management system under ECM will be used to improve forecasting and for measuring submission timelines of translation requests	Dec 2018 Dec 2019

No	Recommendations	Priority	Person(s) Responsible	Other Stakeholders	Management Comments and Action Plan	Deadline
	<p>including: (i) clarifying the role of the Interpretation Section in supporting interpretation services for WIPO co-organized events held outside Headquarters; and (ii) developing a process to measure and report on Program's compliance with the six month rule for requesting Interpretation.</p> <p>(Priority: Medium)</p>		C. Fertis		(b) Current OI on Interpretation Services will be updated	Dec 2019
3.	<p>The Language Division should develop a Quality Assurance Framework including a service level agreement/charter that defines quality expectations, while considering factors such as experience of external translators, complexity and size of documents and that incorporates the various tools available to support quality control. (Priority: Medium)</p>	Medium	L. Fan		A Quality Assurance Framework will be developed	Dec 2019
4.	<p>The Language Division should work with the Patent Cooperation Treaty (PCT) and the Brands and Designs sector to ensure that Terminology and Translation Technology (TTT) Section is designed to address the current and future business needs of all entities involved, and in particular the Language Division, including:</p> <ul style="list-style-type: none"> (a) Establishing a mandate, defining clear roles, responsibilities and accountability, as well as reporting lines for the TTT Section; (b) Ensuring that human resources are sufficient in number and skillset to address the current and future business needs of the Language Division; and (c) Differentiating applications, systems, and operational support tasks that would be outsourced to the TTT Section, and those that 	High	L. Fan	J. Phillips/ A. Valdimarsdottir	Agreement will be reached among all the members of the Board of Directors concerned to address this recommendation	Dec 2018

No	Recommendations	Priority	Person(s) Responsible	Other Stakeholders	Management Comments and Action Plan	Deadline
	would remain within the Language Division, and consider establishing a focal point to liaise between the TTT Section and the business. (Priority: High)					
5.	The Language Division should work with the PCT and the Brands and Designs sector to: (a) Effectively operate and maintain the Language Division's Terminology Database in Production, including allocating a knowledgeable support staff, and assigning the appropriate roles and responsibilities; and (b) Integrate the Language Division Terminology Database into a common customer facing platform with those of the PCT and the Brands and Designs sector. (Priority: High)	High	L. Fan	J. Phillips/ A. Valdimarsdottir	Agreement by all the members of the Board of Directors concerned to address this recommendation Implementation of specific measures to address this recommendation	Dec 2018 Dec 2019
6.	The Language Division should take appropriate measures to ensure the orderly transfer of knowledge and handover of the Terminology Database project. (Priority: High)	High	L. Fan	HRMD/PPBD	Appropriate measures will be taken to ensure the orderly transfer of knowledge and handover of the Terminology Database Project	Dec 2018
7.	The Language Division should: (a) Identify means to include external translators within the Translation Workflow Management System, subject to adequate information security considerations; (b) Work with Information and Communication	Medium	L. Fan	ECM Board/SIAD	(a) Report to the ECM Board LD's need for involving external translators in the new translation workflow management system, and if the related information security policy allows, facilitate such externalization	Dec 2019

No	Recommendations	Priority	Person(s) Responsible	Other Stakeholders	Management Comments and Action Plan	Deadline
	Enterprise Risk Management system. (Priority: Medium)				managed in the Enterprise Risk Management system	
9.	<p>The Language Division should:</p> <p>(a) Take appropriate and sustainable measures to address the resource imbalances in the Language Sections and in particular the inefficiencies in the English Section, including developing an effective plan for back-staffing and effective knowledge transfer; and</p> <p>(b) Implement periodic analyses of interpretation activities, with a view to assessing meeting trends, volume of needs, and workloads, in order to budget flexible human resource needs, to support the Section.</p> <p>(Priority: Medium)</p>	Medium	L. Fan L. Fan/ C. Fertis	HRMD/PPBD HRMD/PPBD	<p>(a) An effective plan for back-staffing will be developed</p> <p>(b) Analysis and evaluation on the work of the Interpretation Section will be carried out to determine, and if necessary, to budget the flexible human resources needs for the Section</p>	Dec 2019 Dec 2019

LIST OF ANNEXES

Annex I	<i>Privileged operational information omitted</i>
Annex II	Risk Rating and Priority of Audit Recommendations

ANNEX II. RISK RATING AND PRIORITY OF AUDIT RECOMMENDATIONS

The risk ratings in the tables below are driven by the combination of likelihood of occurrence of events and the financial impact or harm to the organization's reputation, which may result if the risks materialize. The ratings for audit recommendations are based on the control environment assessed during the audit.

Table II.1: Effectiveness of Risks/ Controls and Residual Risk Rating

		Compound Risk Rating (Likelihood x Impact)			
		Low	Medium	High	Very High
Control Effectiveness	Low	Low	Medium	High	Very High
	Medium	Low	Medium	High	High
	High	Low	Low	Medium	Medium

Table II.2: Priority of Audit Recommendations

Priority of Audit Recommendations	Residual Risk Rating
Requires Immediate Management Attention	Very High
Requires Urgent Management Attention	High
Requires Management Attention	Medium
Routine in Nature	Low

[End of Annex II and of Document]