ORGANISATION DE L'AVIATION
CIVILE INTERNATIONALE

INTERNATIONAL CIVIL
AVIATION ORGANIZATION

Internal Audit Report
on
Outsourced Translation Services

IA/2021/5

Office of Internal Oversight

CONTENTS

EXECUTIVE SUMMARY

1. As part of its annual work plan for 2020 (C-WP/14945), the Office of Internal Oversight (OIO) carried out an audit of outsourced translation services. The audit was conducted in conformance with the International Standards for the Professional Practice of Internal Auditing[1].

2. The objectives of the audit were to assess the adequacy and effective implementation of policies and procedures on outsourcing; the achievement of cost and operational efficiencies related to outsourcing; and the effectiveness of quality assurance mechanisms.

3. Procedures and internal controls relating to the outsourcing process were generally effective and consistently applied. Languages and Publications (LP) has made improvements in some areas, notably the implementation of a Roster Management System to record information on freelance translators and to monitor the status of expenditures against the outsourcing budget. However some weaknesses and areas for further improvement were identified, such as the need to streamline procedures for issuing Direct Purchase Orders (DPOs) in the case of urgent jobs, and to fully document the outsourcing process in a Standard Operating Procedure (SOP).

4. Although LP has prepared guidelines for recruiting, testing and evaluating potential freelance translators for the outsourcing roster, these are not implemented systematically. It is important to ensure that the assessment and approval of new translators follows an established process, and is fully documented in order to ensure equity and transparency in the selection process, as well as to maintain appropriate quality standards.

5. LP engages freelance translators for individual assignments by means of DPO. The Terms attached to this DPO are a hybrid of the Terms and Conditions attached to a standard DPO, and the General Conditions attached to a consultancy contract. However these Terms have not been formally reviewed in their totality by the Legal Affairs and External Relations Bureau to assess whether associated legal risks are mitigated and ICAO's rights and interests are adequately protected.

6. At the end of each financial year, if there are any unspent funds in the outsourcing budget, LP establishes "blanket" DPOs for a selected number of freelance translators in order to commit the funds for the following year. This practice of establishing blanket DPOs for unspecified jobs at the year-end is not in line with financial and accounting rules, which require that there is an actual commitment. The normal procedure is for DPOs to be issued when an assignment is given. In addition, the use of blanket DPOs weakens internal controls and restricts the ability of a translation section Chief to assign work, at the relevant time, to the most appropriate translator.

7. OIO's survey of Council and Air Navigation Commission members showed a high degree of satisfaction with the quality of ICAO's translation services, with an average score of 4.4 out of 5. Suggestions for improvement by survey respondents focused on the need to maintain a high quality through increased proofreading; checking for consistency between documents; and increasing translation timelines if necessary.

8. LP has implemented a Quality Management policy to ensure that outsourced work is checked for completeness and accuracy, and to provide feedback to the translator, especially in cases where corrective action is required. In the 2017-2019 triennium, the target was to carry out spot checks on 25% of outsourced translations. Although some spot checks are carried out by each language section, LP does not collect accurate data on compliance with these targets, nor does it collect and analyse the overall results for management information and performance monitoring purposes.

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[1] IIA Standard 1321

Overall Conclusion

9. Based on the results of the audit, OIO has given an audit rating of some improvement needed. Annex 1 provides further information on the definition of audit terms used in OIO's internal audit reports. Key areas for improvement include: measuring the amount of Quality Management carried out and the extent to which performance targets are being met; eliminating the use of blanket DPOs for future unspecified requirements; strengthening the terms of the legal contract between ICAO and freelance translators; and fully documenting the outsourcing process in an SOP.

10. All recommendations in the report have been accepted. Management comments and proposed actions to implement the recommendations are detailed in the Management Action Plan at Annex 2.

Acknowledgement

11. OIO wishes to thank management and staff for their assistance and cooperation during the audit.

RESULTS OF THE AUDIT

Background

12. There are six working languages of the Organization: Arabic, Chinese, English, French, Russian and Spanish. Translation of documents into all working languages is considered highly important for the worldwide dissemination of ICAO documentation, in particular the Standards and Recommended Practices (SARPs), and for the proper functioning of the Organization and its standing bodies.

13. Due to limited internal translation capacity within Languages and Publications (LP), around 40-50% of the translation workload each year has to be outsourced to external freelance translators.

Table 1 - Volume of translation words assigned internally and outsourced in the 2017 to 2019 triennium[2]

	2017		2018		2019*		Total for 2017-2019 triennium	
	No. of words ('000)	%	No. of words ('000)	%	No. of words ('000)	%	No. of words ('000)	%
In-house translation	5,164	46	6,123	53	6,638	61	17,925	53
Outsourced translation	6,172	54	5,330	47	4,187	39	15,689	47
Total	11,336	100	11,453	100	10,825	100	33,614	100

*2019 was an Assembly year which involves an increased workload for language services

14. In 2020, the proportion of words translated in-house was 59% (5,601,040 words) and 41% was outsourced (3,881,120 words).

Audit Objectives and Scope

15. The objectives of the audit were to:

    i. review the adequacy and effective implementation of policies and procedures on outsourcing of translation services;

    ii. assess whether cost and operational efficiencies are achieved in the balance of in-house provision versus external outsourcing of translation services; and

    iii. assess the effectiveness of quality assurance mechanisms, and other tools and techniques for achieving and maintaining a high quality of outsourced translation services.

16. The scope of the audit covered the 2017 to 2019 triennium and did not include translation services provided by in-house translators, except insofar as this related to the management of, and oversight of, the work of external freelance translators.

Audit Findings and Recommendations

I. Outsourcing Policies

17. Since in-house translation capacity is limited, and is insufficient to handle all of ICAO's translation requirements, the proportion of jobs that are carried out in-house and outsourced is relatively consistent year on year (Table 1). The Council has agreed that the relative proportions should be around 60% in-house and 40% outsourced, and this ratio is built into the budget calculations. However the exact amounts vary each year depending on a number of factors, such as the number and types of

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[2] Data extracted by LP from the EDEN system.

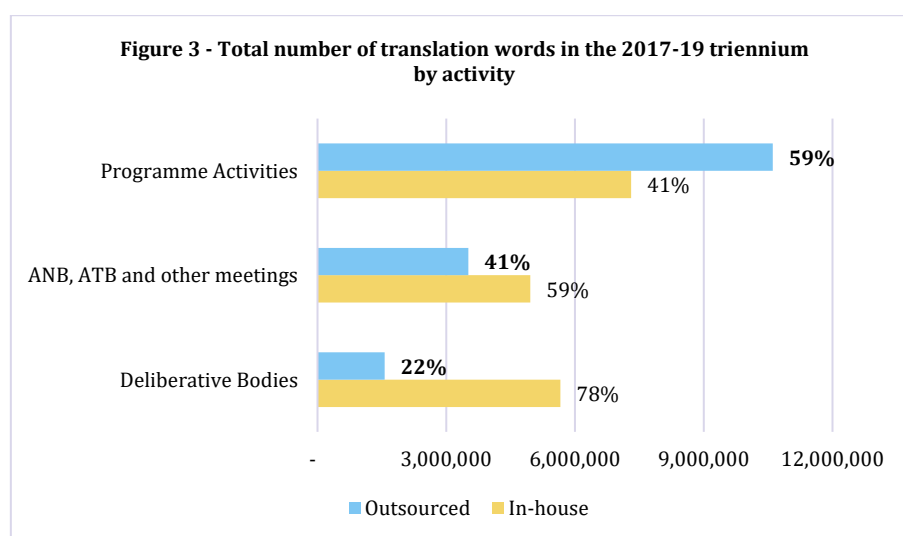documents requiring translation and the associated deadlines. The relative proportions are also similar for each language (Figure 1).

Figure 1 - Total number of translation words in the 2017-19 triennium by language
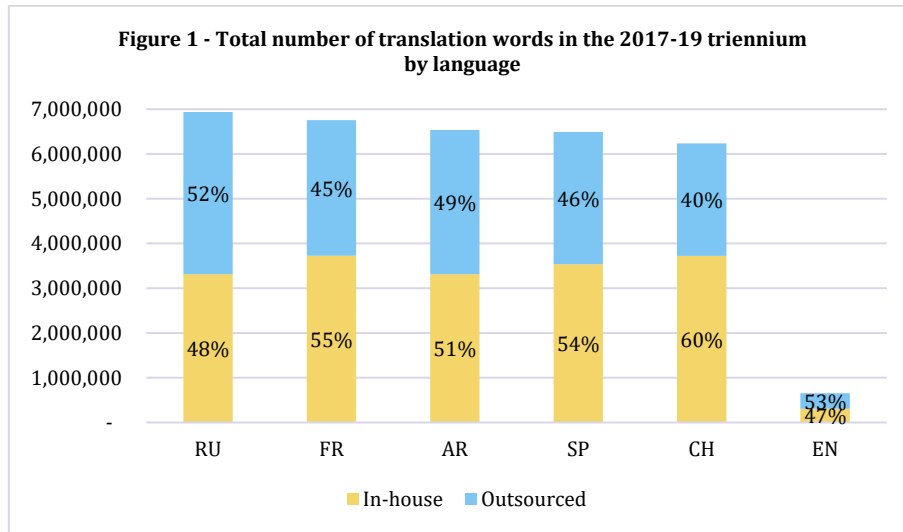
18. The majority of ICAO documents are prepared in English. Documents that need to be translated from Arabic or Chinese into English are done by the translators in the Arabic and Chinese translation sections. Translations from the other languages into English are either done by the English interpreter/translators if they are available, or they are outsourced.

19. The total cost of outsourcing is also consistent year on year (at just under US $1m per year) and is similar for each of the languages other than English (Figure 2). However this only represents the fees paid to freelance translators. It does not include the internal administrative costs associated with processing contracts and payments; the cost of time spent by translation sections in responding to queries from freelance translators; and the time spent undertaking quality management. LP cannot separately identify and quantify these additional costs of outsourcing as there are many other activities within LP (such as editorial and graphic design; text processing, formatting and proofreading; and terminology and referencing services), which are essential to support both in-house and outsourced translations.

Figure 2 - Total outsourcing cost in the 2017-19 triennium by language (USD)
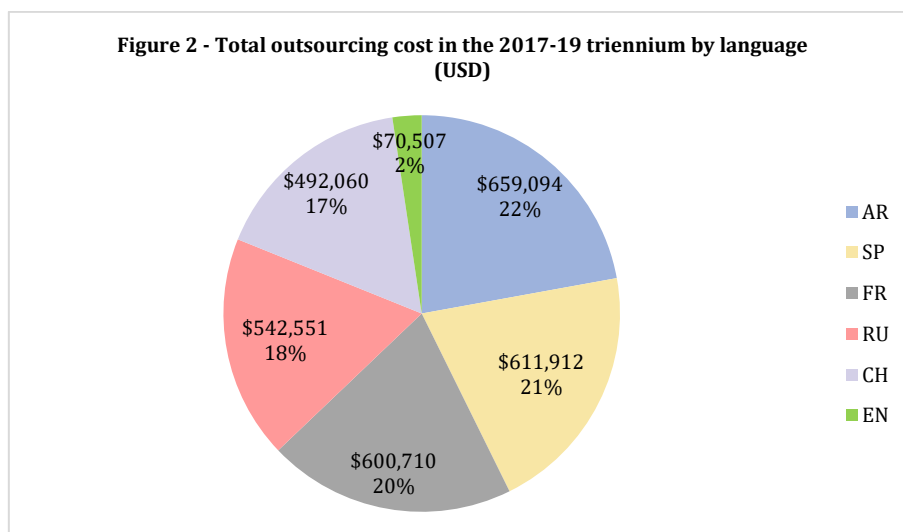
20. According to the *ICAO Administrative Instructions and Procedures on Outsourcing of Translation Services*, the decision to outsource a translation job is made by the Chief of the relevant language translation section, subject to the approval of the Deputy Director, LP, and "is based on whether in-house resources are available, on the subject matter, or on translation deadlines".

21. In practice, translation section Chiefs make outsourcing decisions based on the length of the document and the translation deadline. Virtually all jobs over a few pages in length are outsourced as LP cannot afford to tie up internal resources on a single job for a long time in order to ensure that translation staff have the flexibility to deal with urgent requests. This means that the majority of outsourced jobs are for the translation of documents relating to programme activities (Publications, technical manuals, etc.), and the majority of jobs translated in-house are working papers for the deliberative bodies and other meetings, as well as amendments to Annexes (Figure 3).

Figure 3 - Total number of translation words in the 2017-19 triennium by activity

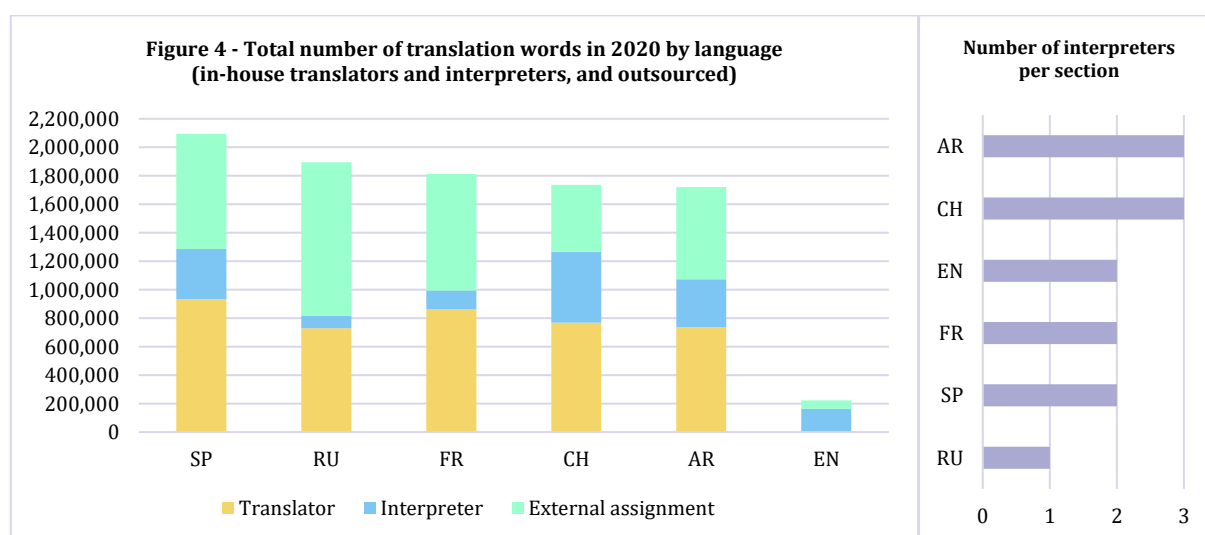| Activity	Outsourced	In-house
Programme Activities	59%	41%
ANB, ATB and other meetings	41%	59%
Deliberative Bodies	22%	78%

Human Resources

22. Staffing levels in each translation section are the same for each language, however vacancies at any given time will affect how much work has to be outsourced. At the end of 2020, there were five vacant posts. Three of these posts had been vacant for over a year (Table 2). Most of the delay in the recruitment process was due to the inability to conduct the normal in-person testing process during the pandemic. This includes extensive written tests and typically involves LP and another UN agency serving as external evaluator[3].

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[3] OIO was informed that with the implementation of a new recruitment system (INSPIRA) in the spring of 2021, a remote testing platform for language officers has been established and has helped to fill two posts as of the end of June 2021.

Table 2 – Vacant posts in the Translation Sections as at 31 December 2020

Title of post	Grade	Vacant since	No. of months vacant as at 31 December 2020
Chief, Spanish Translation Section	P-5	1/8/20	5
Translator/Reviser, Arabic	P-4	1/11/19	14
Translator/Reviser, Russian	P-4	1/1/20	12
Translator/Reviser, French	P-4	1/1/20	12
Translator, French	P-3	1/3/20	10

23. Translation jobs can also be assigned to the interpreters when they are available as interpretation demand represents only 60% of their overall workload on average. Conversely, LP has been increasing the number of translators with interpretation training and experience in recent years as a cost-efficient measure to fill occasional gaps in the booths. Figure 4 shows the proportion of words translated by the interpreters in 2020[4].

Figure 4 - Total number of translation words in 2020 by language (in-house translators and interpreters, and outsourced)
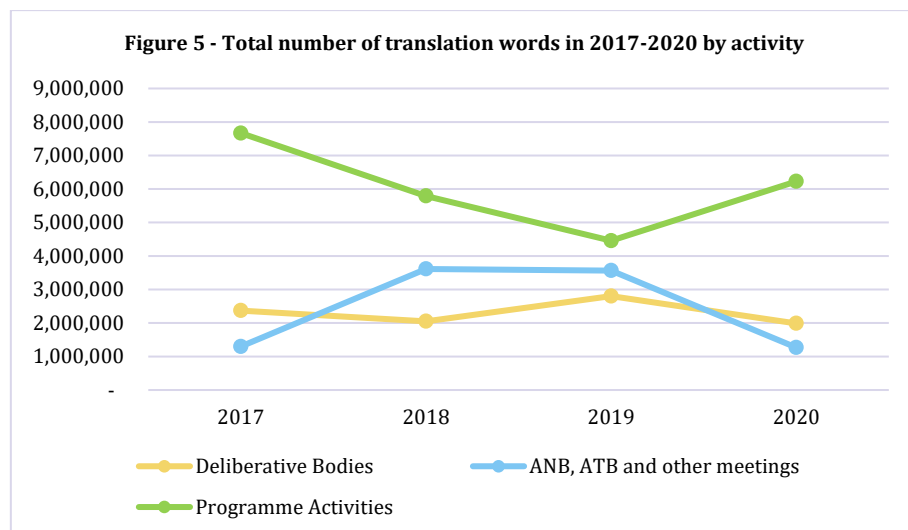
Number of interpreters per section

24. The work for 2020 has been unusual, especially for interpretation. Many of the planned ICAO meetings were not held due to the pandemic, and therefore the interpreters had more time available for translation assignments. Also, as shown in Figure 5, the reduction in the number of meetings and associated documents in 2020 has allowed more resources to be allocated to the translation of documents for programme activities[5].

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[4] The second interpreter for Russian is also the Chief of the Interpretation Section and therefore has other managerial responsibilities.

[5] Publications, Annexes, technical manuals, communications with States, etc.

Figure 5 - Total number of translation words in 2017-2020 by activity

Legend: Deliberative Bodies; ANB, ATB and other meetings; Programme Activities

2019 was an Assembly year which involves an increased workload for language services

25. As shown above, the amount and type of documents that can be translated in-house is dependent on many factors including: filling all in-house translation posts; the most efficient use of interpreters; reducing the number and length of working papers for meetings; maintaining daily productivity standards for in-house translations (1,500 words per day)[6]; and reducing peaks and troughs in workload.

Work Planning

26. LP has established a slotting system to manage the submission and translation of documents. However the translators are highly dependent on originators submitting their documents within the agreed deadlines. LP collects data on the delivery of translations within the established deadlines for deliberative bodies, communications to States and other ICAO meetings[7], however no accurate data is collected and reported on whether originators submit their documents on time, or whether they comply with the mandatory length for each type of document[8]. Ability to eliminate delays and to smooth peaks and troughs will ensure the most efficient use of in-house translators and thereby reduce the amount of work that has to be outsourced.

Recommendation 1	Monitoring of delays in submitting documents for translation
Priority	Medium

Languages and Publications (LP) should monitor the submission of documents against agreed slotting deadlines, and provide periodic reports to the Secretary General on the extent of any late submissions, as well as any suggestions for remedial action.

Closing criteria:

Regular reports on late submissions sent to the Secretary General on a periodic basis, together with any suggestions for remedial action.

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[6] The aggregate productivity target over a twelve-month period is 90% of 1,500 words per translator per day. Actual performance against this target was 88.3% in 2017, 81.2% in 2018, and 90.6% in 2019 as per data recorded in the Corporate Management and Reporting Tool (CMRT).

[7] Performance on this is tracked in the CMRT.

[8] According to paragraph 3.2 of Attachment C of the *Administrative Instructions for the Provision of Language Services* a report is to be generated on Submission Compliance (i.e. number of days between slot date and submission date; percentage of slotted documents submitted on or before slot date; percentage of slotted documents submitted late).
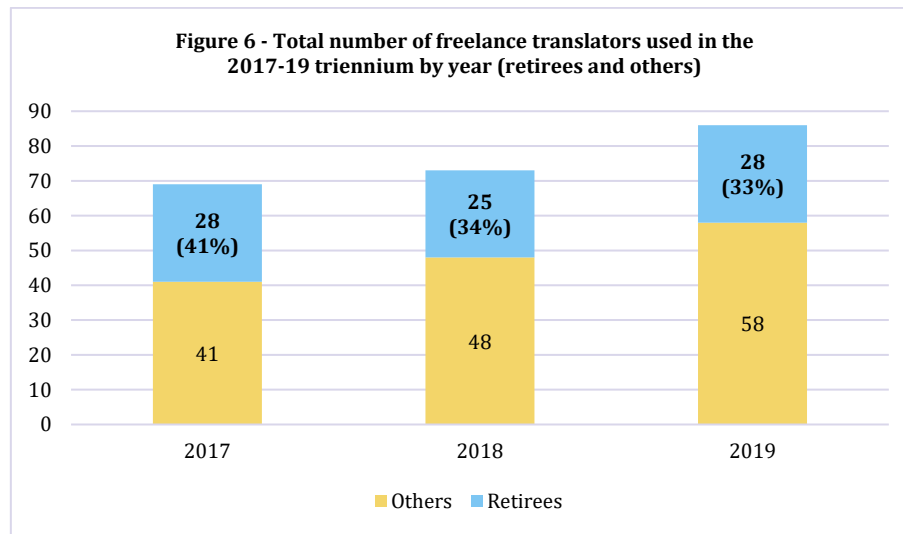
II. Outsourcing Roster

27. LP has prepared guidelines on *Freelancers' Recruitment Best Practices*. According to these guidelines, translation section Chiefs are responsible for recruiting, testing and evaluating potential candidates for the roster. They must submit an electronic file to the Deputy Director, LP containing the results of the test; the candidate's CV and any other relevant information; together with their recommendation on the level and rate to be offered. The Deputy Director, LP will then review the supporting documents and approve the candidate and rate to be paid.

28. OIO reviewed the assessment and approval process for a sample of five freelance translators added to the roster in 2019. The procedures followed in each case did not follow a systematic and fully documented process (as envisaged in the guidelines on *Freelancers' Recruitment Best Practices*). In particular, in the cases selected, independent testing was not done to assess the candidates. However, in one case, the person was a former ICAO staff member. Others had been recommended by UN Headquarters in New York or the International Red Cross in Geneva. In these cases ICAO tends to place reliance on the expertise and integrity of UN system counterparts. However such reliance may not provide sufficient assurance regarding their ability to translate the types of technical documents produced by ICAO.

29. In order to demonstrate equity and transparency in the selection of freelance translators, as well as to maintain appropriate quality standards, it is important to ensure that the assessment and approval of new translators follows an established process, and is fully documented.

30. It is difficult to ascertain how many active freelance translators are currently on the outsourcing roster for each language. Translators are added to the EDEN[9] system in order for a translation Chief to assign them work. However the EDEN drop down list includes translators who have worked for ICAO in the past, but are no longer active. Each translation Chief therefore keeps their own, up to date working list of freelance translators, usually in Excel.

31. LP has recently developed and implemented an electronic Roster Management System. The system records background information and documentation relating to approved translators and can show whether they are active or inactive. However information on freelance translators in the Roster Management System is not yet complete, and does not fully reconcile with the information in EDEN. In addition, the translation section Chiefs have not yet been granted access to view the information in the Roster Management System.

32. Lack of a single source of up to date information on the status of approved freelance translators, their levels and language combinations, as well as their prior and current performance, creates a risk that LP may not use and manage freelance translators in the most effective way.

33. All translation section Chiefs agreed that it is very important to continually expand the outsourcing roster, although it is very difficult to find suitably qualified freelance translators to work on ICAO's specialist and technically complex texts. As is the case for many UN and international organizations, many of the translators currently on the outsourcing roster are retirees. However heavy reliance on retirees is not sustainable in the long term. There are limits on how much work a retiree in receipt of a pension from the UN system can accept each year, and they may also not wish to take on many jobs. It is therefore important for the roster to maintain an appropriate balance between the number of retirees and other freelance translators.

34. Figure 6 shows that the total number of different freelance translators used by LP increased in each year of the 2017 to 2019 triennium. This is a positive trend which LP should continuously monitor and

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[9] Electronic Documents and Enquiry Network. This system is used for managing and controlling the workflow for editing, translation and printing requests. It records statistical and other information on jobs submitted and processed.

try to improve further in order to avoid reliance on only a few individuals and to ensure that all those on the roster remain motivated to work for ICAO.

Figure 6 - Total number of freelance translators used in the 2017-19 triennium by year (retirees and others)

Recommendation 2	Management of the outsourcing roster
Priority	Medium

Languages and Publications (LP) should ensure that:

    i.   New translators are added to the roster only after the quality of their work has been adequately tested/confirmed.

    ii.   Information on all active freelance translators is recorded correctly in EDEN and the Roster Management System and that translation section Chiefs have access to the latter.

    iii.   The use of freelance translators and retirees is regularly monitored to avoid over reliance on a few individuals and to ensure that a sufficient number of qualified new translators are added each year.

Closing criteria:

    i.   Process in place to confirm that the quality of work produced by new translators has been adequately assessed before adding them to the roster.

    ii.   Reconciliation of the information on active freelance translators in EDEN and the Roster Management System and, in the case of the latter, read access granted to translation section Chiefs.

    iii.   Proactive monitoring of the use of freelance translators for each language.

III. Outsourcing Procedures

35. The *ICAO Administrative Instructions and Procedures on Outsourcing of Translation Services* (effective 17 April 2012 and updated in March 2014) sets out the main principles and procedures associated with outsourcing. However the outsourcing process itself has not been fully documented and several changes have occurred since the *Administrative Instructions* were originally drafted.

36. OIO interviewed relevant staff[10] to understand the outsourcing process, carried out a walk through of procedures and associated internal controls, and reviewed a sample of 12 Direct Purchase Orders (DPOs) raised in 2019. (It should be noted that 2019 was an Assembly year, which always involves a very heavy and time-sensitive workload for LP). Key findings included the following:

- Controls over the outsourcing process are generally operating effectively and individual staff understand their particular tasks and responsibilities. However the full outsourcing process is not clearly understood by everyone involved. Lack of a clearly documented process, with clearly assigned roles and responsibilities creates a risk that there may be unidentified gaps in controls and incorrect assumptions regarding responsibilities. Any inefficiencies and opportunities to improve and streamline procedures may also go unnoticed or unaddressed.

- In the case of four of the 12 DPOs sampled (33%), the purchase orders were raised after the jobs had already been completed, and in another two cases (17%) the purchase orders were raised, but not sent to the translator, until after the completed jobs were submitted. The root cause of this problem was the fact that the deadlines for submitting these jobs were very short and did not allow sufficient time to complete all of the relevant internal administrative procedures. Since raising and signing a purchase order after the work has already been completed undermines and invalidates established control processes, LP should consider establishing more streamlined procedures for issuing DPOs/contracts in the case of urgent jobs.

- The development of the new Roster Management System is a good initiative and has provided LP with improved management information on the status of expenditure against the outsourcing budget and the status of purchase requisitions and DPOs.

Recommendation 3	Improve and document outsourcing procedures
Priority	Medium
Languages and Publications (LP) should review and fully document the outsourcing process, taking the opportunity to improve procedures and internal controls where necessary, and to revisit and streamline the current process for urgent jobs.	
Closing criteria:	
Improved and streamlined outsourcing process, fully documented in a Standard Operating Procedure (SOP).	

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[10] The Chiefs of each translation section are responsible for deciding which jobs are to be outsourced. The Outsourcing Group within the Documents Management and Outsourcing Unit of LP is responsible for undertaking the administrative work associated with contracting out translation jobs.

IV. Format of Purchase Orders

37. In accordance with the *ICAO Procurement Code*, allotment holders have delegated authority to issue Direct Purchase Orders (DPOs) to companies for goods and services up to CAN $10,000. Contracts to individuals must normally be issued in accordance with the *Administrative Instructions on Contracts of Individual Consultants/Contractors*, however the Secretary General has granted an exception to LP to use DPOs to hire freelance translators for outsourced jobs[11].

38. The Terms and Conditions attached to a standard DPO (covering delivery of goods, payment terms, settlement of disputes, rights of ICAO, etc.) are designed for companies. LP has therefore developed separate, bespoke "Terms" to be used for freelance translators. The result is that the DPO and Terms used by LP are a hybrid of the Terms and Conditions attached to a standard purchase order and the General Conditions attached to a contract for hiring individual consultants/contractors. However the wording of the DPO itself still refers to a company.

39. The format of the DPO with attached Terms developed by LP has not been reviewed by the Legal Affairs and External Relations Bureau (LEB) to ensure that ICAO's rights and interests are appropriately protected, thereby creating a potential risk in the case of any disputes. There is also a risk that the current Terms may not be sufficiently comprehensive. LP recently requested advice from LEB regarding the inclusion of a confidentiality clause, however the wording on this has not yet been agreed and included in the Terms.

40. In the meantime, LP is currently considering introducing a *Standing Offer for the Services of an Individual Translator* to be issued to approved translators every year. This will set the terms and rates of job assignments and ICAO will then pay the translator in accordance with the requirements of the per-job DPOs as they are accepted during the course of the year.

41. In order to protect ICAO, it is important that a suitable form of contract for hiring freelance translators is agreed as soon as possible and that it is fully reviewed by LEB.

Recommendation 4	Review the legal contract between ICAO and freelance translators
Priority	Medium

Languages and Publications (LP), with advice from the Legal Affairs and External Relations Bureau (LEB), should review the current form of purchase order/contractual agreement used for freelance translators, and make any necessary changes to ensure that it is fit for purpose, mitigates associated legal risks, and fully protects ICAO's rights and interests.

Closing criteria:

Development and use of an appropriate purchase order/contractual agreement that has been reviewed by LEB.

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[11] In her IOM dated 22 July 2020 (revised 19 July 2021), the Secretary General has granted an exception to LP to use DPOs to hire translators provided that there are documented procedures to ensure that such individuals are selected on a competitive basis and that their remuneration is set in accordance with rates established by the International Association of Conference Translators (AITC).

V. Use of Blanket Purchase Orders

42. At the end of each financial year LP sets up "blanket" DPOs. These are purchase orders established in advance to a particular translator for unspecified future requirements. By this means, any unspent budgeted funds are committed so that the money can be used in the following financial year. Once the amount in the blanket purchase order is exhausted, assignments to the translator follow the normal process of issuing a DPO when an assignment is given.

43. In December 2019, LP set up blanket DPOs to 36 translators for a total of US $212,120. By the end of 2020, only US $70,101 had been spent against these DPOs, and in 17 cases, the DPOs had not been used. LP requested the Finance Branch to close a number of these unused blanket DPOs in November 2020, thereby releasing US $89,160 for other jobs in the year.

44. OIO was informed that the reasons for not being able to assign work to all of these translators in 2020 included the following:

    - Lack of timely communication to translation section Chiefs, who were not fully aware of the blanket DPOs that had been set up until they were asked in October 2020 to ensure that unspent funds were used. However this was difficult to do given that it was close to the end of the financial year.

    - Some of the selected translators were not available, were no longer freelancing, or declined work during 2020.

    - Lack of availability of in-house staff in 2020 to revise the work of the selected junior translators due to staff vacancies.

45. Unfortunately, the practice of setting up such blanket DPOs is not in line with financial and accounting rules, which require that there is a specific commitment before issuing a purchase order. Future unspecified requirements do not count as a definite commitment at the year end. In addition, blanket DPOs are not used elsewhere in ICAO and are not permitted under the *ICAO Procurement Code*.

46. In addition to tying up funds which may not actually be used, there are a number of other risks associated with the use of blanket DPOs:

    - Blanket DPOs commit translation section Chiefs to assigning work to specific translators. However outsourcing decisions should be made at the relevant time, to the most appropriate translator taking into account their availability; their capacity to deal with the subject-matter of a particular job; and other factors such as their prior performance and responsiveness.

    - The blanket DPO is not raised at the time a job is assigned and is not linked to a specific job with a clear deadline. The exact status of the contractual commitment between ICAO and the translator is therefore not clearly defined since the blanket DPO signed by the translator only specifies the rate to be paid and a number of words to be translated.

    - The allotment holder only approves the blanket commitment and does not approve the individual jobs as and when they are assigned.

    - In cases where jobs are split between more than one purchase order, this weakens internal controls and increases the risk that duplicate payments may be made for the same jobs. However LP has mitigated this particular risk by creating a function within the new Roster Management System to extract information from Agresso on the status of jobs charged against blanket DPOs for monitoring purposes.

Recommendation 5	Use of blanket purchase orders
Priority	High

    i.   The Finance Branch (FIN) should clearly document the rules on commitments and communicate these to all allotment holders.

    ii.   Languages and Publications (LP) should avoid the use of blanket DPOs for general outsourcing requirements and ensure that DPOs are issued for specified jobs with clearly defined deliverables.

Closing criteria:

    i.   Documentation and dissemination of the rules on commitments.

    ii.   Elimination of blanket DPOs established at the year-end for future unspecified outsourcing requirements.

VI. Quality Management

47. Attachment E of the *ICAO Administrative Instructions and Procedures on Outsourcing of Translation Services* contains guidelines for performing Quality Management of contractual translations. Quality Management is carried out to ensure that outsourced work has been carried out in accordance with the specific requirements and terms of the contract and that it is complete and accurate. It consists of spot checking 10 to 15 per cent of an outsourced translation[12]. Contractors are informed of the results in order to improve the quality of their work.

48. According to the ICAO Business Plan and Budget for 2017 to 2019, ''spot-checking will be performed on 25% of outsourced translations''. Due to budget constraints, this target has been reduced to 15% in the 2020 to 2022 triennium[13].

49. Due to limitations of the EDEN system, LP does not collect accurate data on compliance with the above targets. Only one of the sample of 12 outsourced translation jobs in 2019 reviewed by OIO had been subject to formal spot-checking. In another case, the translation was fully revised since the work had been done by a translator below the T-4 level.

50. Translation section Chiefs confirmed that they carry out and document spot-checks on some outsourced translations in accordance with the guidelines for performing Quality Management. In addition, less formal checks are carried out on some (mostly shorter) documents by quickly reading the translation to check for any obvious errors. However, due to the urgency and short timelines for many jobs there is often insufficient time to carry out Quality Management. This highlights the need for originators to meet their submission deadlines, since it is usually LP who has to absorb the impact of any delays.

51. In order to maintain a high quality for outsourced translations, it is important to build in the time and resources needed to carry out Quality Management. LP will therefore need to start accurately measuring the amount of Quality Management carried out, and the extent to which targets are being met. The results of spot-checks (in terms of the overall conclusion reached) should also be centrally recorded and monitored to ensure that high standards are maintained.

52. In late 2019, LP commissioned a Translation Quality Audit for Arabic, Chinese, French, Russian and Spanish publications as an additional means of assessing the accuracy and quality of translations. Experienced senior revisers were recruited to independently audit a sample of 15 publications selected

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[12] A template Evaluation Form is used for this assessment. A final grading is given of: Very Good; Good; Average (passing mark); Below Average; or Unacceptable.

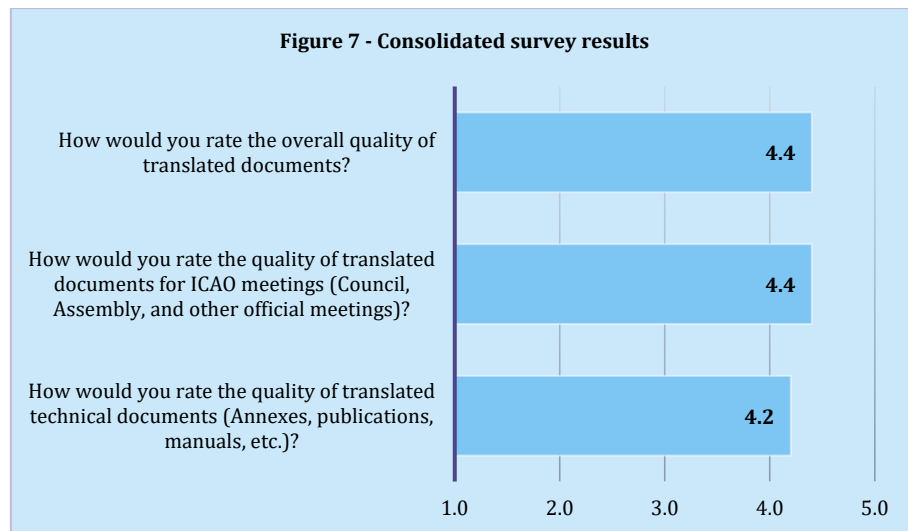[13] ICAO Business Plan and Budget for 2020 to 2022.

by LP to assess the extent and severity of any errors, and to provide recommendations on where and how the translation could be improved. The auditors assessed the published versions in their respective languages against the English source documents. This decision to carry out a Translation Quality Audit is a good initiative by LP. Unfortunately, due to the pandemic, the consolidated results of the auditors' findings has yet to be completed.

Recommendation 6	Implement measures to ensure a consistently high quality of outsourced translation work
Priority	High

Languages and Publications (LP) should:

  i.   Establish a reliable mechanism for recording and measuring the extent to which Quality Management is carried out for each language, and the standards achieved.

  ii. Report annual performance against the targets established for Quality Management.

  iii. Complete the evaluation of the results of the Translation Quality Audit carried out at the end of 2019 and implement any recommendations for improvement.

Closing criteria:

  i.   Establishment of a reliable mechanism to record and report on the extent and results of Quality Management carried out each year for each language.

  ii. Annual reporting to the Council on LP's performance against Quality Management targets.

  iii. Evaluation of the results of the Translation Quality Audit and implementation of any recommendations for improvement.

VII. User Satisfaction

53. OIO conducted a survey of Council and Air Navigation Commission members to assess the quality and accuracy of translated documents and to obtain any feedback and suggestions for improvement. The total number of survey respondents was 25.

54. The results of the survey showed that users are generally very satisfied with the quality of ICAO's translation services. Users were asked to rate their satisfaction on a scale of 1 to 5, with 5 being the most satisfied (Figure 7). The average score was 4.4.

Figure 7 - Consolidated survey results

Question	Score
How would you rate the overall quality of translated documents?	4.4
How would you rate the quality of translated documents for ICAO meetings (Council, Assembly, and other official meetings)?	4.4
How would you rate the quality of translated technical documents (Annexes, publications, manuals, etc.)?	4.2

Scale: 1.0   2.0   3.0   4.0   5.0

55. Respondents gave a higher average score for the quality of translated documents for ICAO meetings than for technical documents (an average score of 4.4 compared to 4.2). This may be a reflection of the fact that in-house staff translate most documents for meetings, whereas most technical documents are outsourced. However it could also be a reflection of the greater complexity of technical documents.

56. Comments received from survey respondents were also largely positive, with some strong appreciation for the work of LP. A few suggestions for improvements are summarised as follows:

- More professional/highly specialized translators, with expertise in relevant fields, should be employed/contracted in order to increase efficiency and flexibility in the delivery of the final product to a high quality.

- Increase proofreading scrutiny and cross checking for consistency between documents.

- Allocate the necessary resource to improve editorial and quality control.

- Increase translation timelines when needed. The aviation community would rather have more consistent multi language SARPs than a quicker developed one of average quality.

- Make further efforts to improve accuracy when translating technical documents, in particular those which include terminology relating to new technologies or innovative concepts.

57. LP could address most of the above comments by ensuring that Quality Management procedures are consistently applied, and that sufficient time is factored into the translation process to ensure that this is done (Recommendations 6 and 1).

ANNEX 1: DEFINITION OF AUDIT TERMS

Audit Ratings

In providing an overall assessment of the results of the audit, OIO uses the following standardized audit rating definitions:

Audit Assessment	Definition
Effective	Controls evaluated are adequate, appropriate, and effective to provide reasonable assurance that risks are being managed and objectives should be met.
Some Improvement Needed	A few specific control weaknesses or areas for improvement were noted; generally however, controls evaluated are adequate, appropriate, and effective to provide reasonable assurance that risks are being managed and objectives should be met.
Major Improvement Needed	Several key control weaknesses were noted and/or several areas of strategic/high importance were identified where significant improvements can be made to increase efficiency and effectiveness.
Unsatisfactory	Controls evaluated are not adequate, appropriate, or effective to provide reasonable assurance that risks are being managed and objectives should be met.

Internal control is defined as a process effected by senior management and staff, designed to provide reasonable assurance regarding the achievement of objectives relating to operations, reporting and compliance objectives. Whilst internal control provides reasonable (but not absolute) assurance of achieving organizational objectives, limitations may result from:

- suitability of objectives established as a precondition to internal control;
- reality that human judgment in decision making can be faulty and subject to bias;
- breakdowns can occur because of human failures such as simple errors;
- ability of management to override internal control;
- ability of management, other staff, and/or third parties to circumvent controls through collusion;
- external events beyond the organization's control.

Priority of Audit Recommendations

The audit recommendations in this report are categorized according to priority as a guide to management in addressing the issues raised. The following categories are used:

High: recommendations which address significant and/or pervasive deficiencies or control weaknesses, or areas where significant improvements can be made.

Medium: recommendations which address important deficiencies or control weaknesses, or areas where some improvements can be made.

Low: suggestions which represent best practice, or general opportunities for improvement.

ANNEX 2: MANAGEMENT ACTION PLAN

Ref.	Recommendation	Priority Rating	Accepted (Y/N)	Management Comments	Agreed Actions	Office/ Section Responsible	Target Date
1.	Languages and Publications (LP) should monitor the submission of documents against agreed slotting deadlines, and provide periodic reports to the Secretary General on the extent of any late submissions, as well as any suggestions for remedial action.	Medium	Yes	Initial attempts to automate in EDEN the tracking of submissions against agreed slotting deadlines were not successful. However, the slotting of deliberative bodies' (DB) documents and working papers for other ICAO meetings is an on-going activity with mostly successful results. It is linked with the CKPI on delivery of documentation, which exceeds 90% for DBs since the CKPI was established. Note: The new LSMS system should help address this requirement as it has been included in the Procurement TORs for the LSMS Project.	1. Pending completion of the LSMS Project, start a new initiative to automate the tracking of submissions in EDEN. 2. Create a periodic report to be presented to the SG [through the Publications Priority Board].	ADB/LP	1 and 2: 31/12/2022
2.	Languages and Publications (LP) should ensure that: i) New translators are added to the roster only after the quality of their	Medium	Yes	1. Traditionally, the first few jobs assigned to new freelancers are assessed for quality and suitability.	1. Introduce a six-month/one-year probation for new freelancers to assess the quality and suitability of their work in a systematic manner before they are confirmed.	ADB/LP	1, 2, 3: 31/12/2021

Ref.	Recommendation	Priority Rating	Accepted (Y/N)	Management Comments	Agreed Actions	Office/ Section Responsible	Target Date
	work has been adequately tested/confirmed. ii) Information on all active freelance translators is recorded correctly in EDEN and the Roster Management System and that translation section Chiefs have access to the latter. iii) The use of freelance translators and retirees is regularly monitored to avoid over reliance on a few individuals and to ensure that a sufficient number of qualified new translators are added each year.			However, this process is not formalized. 2. Once the Roster Management System has been fully implemented, read access will be given to the section Chiefs for information related to their respective sections and languages. Note: The new LSMS system should help address this requirement as it has been included in the Procurement TORs for the LSMS Project.	2. Record information on all active freelancers in EDEN and the Roster Management System, including CV, personal history, testing, evaluation, and decision to establish grade. Read access to be given to translation section Chiefs for information related to their respective sections and languages. 3. A quarterly/half-yearly review process to be established to monitor the use of all freelancers (including retirees) and to ensure that a sufficient number of qualified new translators are added to the roster each year.		
3.	Languages and Publications (LP) should review and fully document the outsourcing process, taking the opportunity to improve procedures and internal controls where necessary, and to revisit and streamline the current process for urgent jobs.	Medium	Yes	Procedures in place will be reviewed to implement additional controls as required.	Compile all relevant information and prepare a detailed Standard Operating Procedure (SOP) on translation outsourcing, with a view to streamlining the procedures and detailing roles and responsibilities for all stakeholders.	ADB/LP	Q3 2021
4.	Languages and Publications (LP), with advice from the Legal Affairs and External Relations Bureau (LEB), should review the current form of purchase order/contractual	Medium	Yes	LP and LEB will review the terms and conditions attached to the DPOs for outsourced translation work.	New Terms and Conditions will be approved and attached to DPOs for outsourced translation work.	ADB/LP and LEB	Q4 2021

Ref.	Recommendation	Priority Rating	Accepted (Y/N)	Management Comments	Agreed Actions	Office/ Section Responsible	Target Date
	agreement used for freelance translators, and make any necessary changes to ensure that it is fit for purpose, mitigates associated legal risks, and fully protects ICAO's rights and interests.						
5.	i) The Finance Branch (FIN) should clearly document the rules on commitments and communicate these to all allotment holders. ii) Languages and Publications (LP) should avoid the use of blanket DPOs for general outsourcing requirements and ensure that DPOs are issued for specified jobs with clearly defined deliverables.	High	Yes	1. FIN will make it clear that managers know the rules on commitments, and will communicate these rules to all managers. 2. The main purpose for establishing blanket DPOs is to facilitate assignments to translators who are assigned work more often; this minimizes the number of DPOs to be issued. It also facilitates the processing of urgent jobs with very tight deadlines as, in many cases, the deadline would be reached before a DPO could be issued. Therefore, after discussions with FIN, instead of establishing blanket DPOs at the year-end we are proposing the establishment of Service Level Agreements at the beginning of the year	1. When FIN sends its year-end instruction to managers, the definition and criteria for a commitment will be emphasized. 2. Establishment of an annual Service Level Agreement (SLA) with individual translators at the beginning of the year, indicating a maximum number of words for the year, the remuneration rate and the terms of engagement. . DPOs will be issued up to the maximum amount established.	ADB/LP, FIN and LEB	1 and 2: 31/12/2021

Ref.	Recommendation	Priority Rating	Accepted (Y/N)	Management Comments	Agreed Actions	Office/ Section Responsible	Target Date
				with individual translators. The SLA would indicate a maximum number of words to translate, the rate and the terms of delivery. DPOs will be issued up to the ceiling established, but will not exceed the previous three-year average for the individual translator. This will ensure that the individual translator is available for ICAO when needed. The SLA will be attached to each DPO and a GRN will be issued for each completed assignment when work is delivered and accepted and the corresponding invoice is received.			
6.	Languages and Publications (LP) should: i) Establish a reliable mechanism for recording and measuring the extent to which Quality Management is carried out for each language, and the standards achieved.	High	Yes	i) and ii): LP will monitor the updated procedure for QM and, to the extent possible, automate it so as to produce reliable QM reports for all languages. Note: The new LSMS system should help address this requirement as it has been	1. A mechanism will be implemented to track QM of outsourced work and to report on the targets established in LP's Operational Plan. 2. Annual performance will be reported against the targets established for Quality Management. 3. A final report of the Translation Quality Audit carried out at the end	ADB/LP	1. 31/12/2021 2. 31/12/2022 3. 31/12/2021

Ref.	Recommendation	Priority Rating	Accepted (Y/N)	Management Comments	Agreed Actions	Office/ Section Responsible	Target Date
	ii) Report annual performance against the targets established for Quality Management. iii) Complete the evaluation of the results of the Translation Quality Audit carried out at the end of 2019 and implement any recommendations for improvement.			included in the Procurement TORs for the LSMS Project. iii) LP will complete the evaluation of the Translation Quality Audit.	of 2019 will be finalized. Recommendations for improvement will be implemented.		