



COMITE CENTRAL DU PERSONNEL

Brussels, le 19 juin 2012
CCP - CS/VDC – D (12) D096

Note à l'attention M. Philippe Brunet, Chef de Cabinet de Mme Androulla VASSILIOU Commissaire à l'Education, Culture, Multilinguisme et Jeunesse

Objet : Restructuration de la Direction générale de la Traduction

Lors de la réunion du 24 mai dernier, la représentation du personnel vous a fait part de sa position vis-à-vis du projet de restructuration de la Direction générale de la traduction (DGT) en l'accompagnant de propositions alternatives et en demandant la modification de certains éléments, fortement critiqués par la majorité de son personnel. Elle a confirmé et détaillé son point de vue dans la note du 30 mai 2012 adressée à Madame Vassiliou.

Nonobstant, il semble que le processus de restructuration de la DGT se poursuive sans tenir compte des propositions faites par la représentation du personnel.

Aussi, nous vous serions très reconnaissants de bien vouloir nous donner une réponse détaillée quant à l'opinion de votre Cabinet sur ce dossier et de nous préciser à quel stade il est prévu de tenir compte de nos propositions alternatives.

Dans l'attente d'une réponse de votre part, nous restons convaincus que la voie du dialogue social pourra être poursuivie afin d'atteindre les objectifs recherchés, ceci sans démotiver le personnel, ni affaiblir de façon irrémédiable les capacités de traduction et la structure de la DGT.

(Signé)

Cristiano Sebastiani

Président du Comité central
du personnel

(Signé)

Philippe Bioul

Président du Comité local
du personnel

(Signé)

Rytis Virbalis

Président de la Délégation
permanente de traducteurs

P.J. : Note du 30 Mai à l'attention de Mme Androulla VASSILIOU, Commissaire à l'Education, culture, multilinguisme et jeunesse avec analyse détaillée d'options et récapitulatif des propositions

Cc : M. Martikonis, Directeur Général de la DGT
Membres DPT
CLPs Bxl et Lux

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ANNEXE

Bruxelles, le 30 mai 2012
CCP - CS/VDN D (12) 077

Note à l'attention de Mme Androulla VASSILIOU Commissaire à l'Education, culture, multilinguisme et jeunesse

Objet : Restructuration de la Direction générale de la traduction

Suite à la réunion très ouverte et fructueuse avec M. Brunet du 24 mai dernier, la représentation du personnel vous fait part de sa position vis-à-vis du projet de restructuration de la Direction générale de la traduction (DGT), assortie de quelques éléments de réflexion et options à considérer.

Comme souligné lors de ladite réunion, les objectifs de recentrage de la DGT sur ses tâches essentielles de traduction et de renforcement de ses structures ne peuvent qu'être partagés par les représentants du personnel. Or, à notre avis, le projet actuel de restructuration de la DGT ne sert pas ces objectifs, mais le seul but recherché est celui d'une réduction de personnel. Il doit donc être affiné pour atteindre les objectifs recherchés.

Ce projet comporte en fait des risques sérieux de dysfonctionnements susceptibles d'entraîner un affaiblissement structurel de son organisation et de nuire à la fourniture de ses services. Tout en signalant que ni les risques, ni l'impact de ce projet n'ont été évalués et que l'analyse de ses coûts et bénéfiques fait défaut, nous attirons votre attention sur les points principaux qui ont retenu l'intérêt de votre chef de cabinet et sur les éventuelles solutions alternatives.

Une réduction drastique de l'encadrement intermédiaire opérationnel

Contrairement à l'objectif annoncé de renforcer la DGT pour faire face à l'accroissement de la demande de traduction, le nombre de postes d'encadrement intermédiaire est réduit de 25% (suppression d'une trentaine de postes dont 23 postes de chef d'unité de traduction).

Cette énorme réduction, qui multiplie par cinq dans cette catégorie l'objectif de réduction de 5% des effectifs fixé à la Commission, frappe lourdement l'encadrement intermédiaire opérationnel. Elle implique le démantèlement effectif de nombreuses équipes de traduction et une perte de potentiel certaine pour la DGT en termes de capacité de gestion du personnel et du travail. En outre, cette réduction vise les chefs d'unité de traduction, le niveau d'encadrement le plus apprécié par le personnel de la DGT d'après l'enquête menée en 2011.

Afin d'éviter un risque grave de perte d'efficacité, il semblerait approprié de conserver les postes d'encadrement intermédiaire opérationnel et donc le nombre d'unités de traduction existantes en alignant la structure hiérarchique de la DGT sur le modèle de gestion de toutes les autres DG (chef d'unité, directeur, directeur général) par la reconversion des actuels chefs de département en chefs d'unité ou en conseillers, en fonction des besoins et du nombre total de postes d'encadrement à réduire effectivement.

De cette façon, l'actuelle structure, équilibrée et efficace, serait maintenue et renforcée par l'apport direct des anciens chefs de département à la tâche essentielle de la DGT, en évitant toute perturbation du travail résultant de la suppression et de la fusion d'unités, sans aucun coût social ni économique supplémentaire.

Des unités de traduction difficilement gérables pour assurer la qualité de la production

Comme conséquence du projet de restructuration, la plupart des départements linguistiques ont opté pour la fusion et la création de grandes unités de traduction de 40 traducteurs ou plus, tandis que très peu d'entre eux ont préféré constituer des unités «transardennaises».

Le premier format pose un problème de taille des unités qui va exiger le recours pour leur gestion à des chefs de secteur, (la nomination de chefs d'unité adjoints n'étant pas envisagée), ce qui représentera de fait une couche hiérarchique supplémentaire. La deuxième configuration y ajoute les difficultés d'organisation du travail entre les deux sites, y compris l'évaluation du personnel, ainsi que de communication et d'intégration entre les deux parties des unités, sans parler de la discrimination entre les unités de traduction «transardennaises» et celles basées sur un seul site, puisqu'elles accompliraient des tâches identiques dans des conditions très différentes.

Le maintien de la structure existante en transformant les chefs de département en chefs d'unité de traduction ou en conseillers permettrait de garantir la qualité de la traduction et de la gestion tout en réduisant le nombre de postes d'encadrement intermédiaire et en évitant les unités de traduction «transardennaises».

La communication multilingue est affectée

Le projet de restructuration prévoit la suppression de l'actuelle unité Web multilingue et le retour de ses traducteurs dans leurs départements linguistiques respectifs (ce qui est aussi le cas des traducteurs affectés aux antennes et regroupés dans une unité à présent).

Ce rapatriement dans les départements linguistiques de ce personnel à l'avant-garde de la communication multilingue, qui garantit le contact direct et immédiat avec les citoyens et dont l'unité est perçue comme une enseigne de modernité, impliquera *de facto* la fin de l'approche concertée multiculturelle de la traduction pour le réseau et son atomisation en 24 visions propres à chaque département linguistique. Il donnera un signal de dégradation de l'importance attachée au multilinguisme ainsi que de l'image professionnelle de la DGT et de la Commission, et pourra donner lieu à une disparité de traitement du même dossier en fonction de la langue.

Si l'on veut minimiser les coûts sociaux et économiques et maximiser les bénéfices des services de communication multilingue, il paraît opportun d'envisager une refonte de l'unité actuelle qui pourrait être maintenue en renforçant ses liens avec les départements linguistiques, sa flexibilité et ses systèmes de gestion.

Et la traduction des actes législatifs pourrait l'être aussi

Les chefs des départements linguistiques se voient conférer par le projet de restructuration des nouvelles tâches de relation avec les autres directions générales en ce qui concerne la gestion de leur demande de traduction.

Étant donné qu'il existera une direction pour les relations avec les demandeurs ainsi qu'une unité en charge de la gestion de la demande de traduction, le nombre élevé d'acteurs impliqués entraînera un risque d'interférences, mais aussi de contradictions, s'il n'existe pas une ligne claire de responsabilités ni une procédure décisionnelle bien définie qui garantisse la sécurité juridique et l'égalité de traitement des demandes de traduction.

Pour assurer que la DGT devienne un partenaire à part entière du processus législatif et de communication, comme elle le prévoit, la gestion proactive de la demande de traduction doit devenir une priorité et sa mise en œuvre doit être confiée à un personnel qualifié et expérimenté, évitant tout risque de divergence lié à l'implication de 24 chefs de département.

Un risque majeur de fragmentation comme corollaire

Le redimensionnement du rôle des chefs de département se traduit par une organisation à la carte et des départements linguistiques avec des asymétries difficiles à comprendre pour un observateur externe.

Les directions générales auront du mal à trouver une explication au fait qu'elles sont desservies par différentes unités selon les langues en question et par des unités basées à Bruxelles ou à Luxembourg ou par une unité «transardennaise» pour le même domaine d'activité. Cela représentera certainement une contrainte dans leur travail.

Comme corollaire, il existe un risque majeur de fragmentation de la DGT, avec 24 départements, agissant chacun selon ses propres lignes d'action. Il doit y avoir un contreponds en termes de politique du multilinguisme et de stratégie commune de gestion de l'offre et de la demande de traduction afin que la DGT soit perçue comme l'interlocuteur unique en matière de traduction, parlant d'une seule voix cohérente avec ses partenaires.

Après avoir passé en revue le projet de restructuration de la DGT et fourni des éventuelles pistes de réflexion pour sa rationalisation en vue d'une meilleure relation coûts-bénéfices (voir l'annexe pour les détails), la représentation du personnel exprime son inquiétude pour l'impact négatif et durable que ce projet pourrait avoir pour la DGT ; elle reste toutefois optimiste car des modifications sont encore possibles afin d'y remédier.

Nous sommes naturellement conscients de la nécessité de procéder à des ajustements pour répondre à la situation de crise, mais il est capital que la continuité du service soit assurée dans les meilleures conditions sans bouleverser les équilibres ni provoquer des risques.

Nous vous remercions de la large ouverture au dialogue social dont vous et votre cabinet avez fait preuve, et restons convaincus que cette voie pourra être poursuivie pour bâtir la restructuration sur les réalisations acquises par la DGT, de sorte qu'elle puisse continuer à fournir ses services avec moins de moyens.

(Signé)

Cristiano Sebastiani

Président du Comité central
du personnel

(Signé)

Philippe Bioul

Président du Comité local
du personnel

(Signé)

Rytis Virbalis

Président de la Délégation
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P.J. : Analyse détaillée d'options et récapitulatif des propositions

Cc : M. Brunet Ph. (CAB VAS)
M. Martikonis, Directeur Général de la DGT
Membres DPT
CLPs Bxl et Lux

INTRODUCTORY COMMENTS

DGT has been now been delivering for years to the fullest satisfaction of its partner services [other DGs].

Even under the adverse conditions of the recent period of extremely high demand, DGT was able to deliver high quality on time for all products requested in its core business area (translation), as well as associated activities [cf. European Master's in Translation and the Juvenes Translatores competition].

Any proposal for restructuring DGT should be based on analysis of current service needs [**external** and **internal drivers**, such as staff-cutting proposals under the 2012 reform, the possibility for improving performance further still with appropriate working conditions making use, for example, of state-of-the-art software and hardware translation support tools],

A. EXTERNAL DRIVERS

The 2012 reform proposal provides, among other things, for a 5% reduction of human resources.

DGs are expected to make the necessary adjustments. However, the sacrifices made may be asymmetrical.

Some 16 DGs are to be reinforced with the allocation of more posts [e.g. ECFIN], while some 27 are to bear the burden for this situation [including DGT].

DGT has been invited to implement a 5% staff reduction this year followed by a gradual downsizing by 1% in each of the five subsequent years [corresponding to some 240 posts in total].

This decrease in posts is particularly painful for DGT in the light of its restructuring in 2006-2007, which entailed a spectacular demographic and managerial downsizing.

Nevertheless, it could be done and would be widely accepted by DGT staff if it does not affect the excellent operational capacity of the core business services.

DGT could continue with the present business model if posts to be given up were evenly distributed between management and non-management posts. Failing this, structural changes would likely be deemed necessary because of managerial post drainage and an insufficient management grasp in general.

It would be appropriate to relinquish non-management posts primarily from horizontal units to maximize translating capacity [as the initial proposal provides for] and thanks to a limited redeployment from horizontal units to translating ones, in conjunction with a limited or zero replacement policy for forthcoming retirements in many language departments [also provided in the initial proposal]. This re-pooling of translating resources in combination with the use of further new technologies would enable seamless continuation of the core business services while maintaining the same level of employment conditions for staff.

The sacrifice of 5% of DGT non-management posts this year with a further, gradual reduction by 1% every year for the next five years is not a problem in itself thanks to the demography of DGT's core units and the scope for the re-pooling translating resources. Therefore, it should not be deemed a factor in favour of the proposed restructuring.

Management posts:

DGT has some 100 management posts.

All levels of management should be considered in the context of the re-allocation of posts [Directors/Heads of Language Departments/ Heads of Units (both non-translating and translating HofUs)].

Any transfer of management posts should be done in such a way as to safeguard the seamless operation of core business services and units.

Since these units are already of optimum size for most core business departments [number of translators in line with Commission standards], all are experienced, and translating HofUs are trusted by their staff and have been working under operational conditions considered optimal by linguists [entire units based in one location], it is of paramount importance to safeguard the current language department structure.

The idea of asymmetrical portfolio distribution should be avoided as far as possible in order to ensure that an efficient overview is maintained.

On the basis of previous painful experiences [cf. below: INTERNAL DRIVERS], advisor ships should be extremely limited in number and must have real operational remits.

With regard to the re-allocation of management posts, two different options have been raised: re-allocation of management posts in line with overall post re-allocation [5% in 2012 and then 1% per year for five years] or a higher rate than the rate scheduled for non-management posts ['asymmetrical re-allocation'].

The initial proposal adopts the second option of a higher rate of reduction for management posts, without considering the first option. It provides for an immediate re-allocation of some 23 management posts [more than 20% of all DGT management posts] despite a similar, spectacular re-allocation process as part of the previous restructuring exercise in 2006-7. Yet according to third party information, all other DGs in a similar position seem to have been giving up 12-15% of their management posts.

Verification is required urgently as to whether the Cabinet really expects DGT to:
a. proceed with such a drastic cut in management posts [more than 20%] or whether it envisages the possibility of aligning the re-allocation of DGT management posts with the reasonable standards applied by other DGs involved in the same process [12-15%], and
b. redeploy management posts gradually [2012-2018], or all at once [2012].

Should the worst case scenario of immediate and asymmetrical re-allocation of management posts be the option chosen, the 23 posts should be released in such a way as to minimise operational and, to some extent, human cost at both non-managerial and managerial level.

Consequently, all options should be examined in terms of re-assignment of management posts from 'horizontal' units [including at Director's level].

The core business structure should be maintained in all sectors in view of the outstanding operational results to date [principle of "if it is not broken, don't fix it"].

In order to minimise operational cost and human cost at non-managerial level: all units and their translation portfolios should remain unchanged.

If Head of Unit (HofU) posts are sacrificed, the respective Head of Language Departments (HofD) should step in and be entrusted with the management of orphan units which no longer have a HofU.

This would be a perfectly feasible step for Heads of Language Departments, since this has been done frequently in the past in case of temporary HoU vacancies, Heads of Language Departments are former translators, worked as translating HofUs and, consequently, are more than familiar with the HofU role.

Since there are 23 HofLD posts, there will be more than enough translating managers to guarantee HofU level command for all translating units. The stabilization of the core business structure will have a reassuring effect on translators, since it will dispense with the notion of translating units split between two different sites, maintain units of a reasonable and comparable size and avoid haphazard reorganisation and diversification of the portfolio of DGs serviced by each unit, and ensure that the symmetrical overview is not lost [all of which are key friction points at present].

In parallel, the direct involvement of HofLDs in unit management will make DGT's line of command slightly shorter, thereby improving communication [four levels of hierarchy now – three if HofLDs were directly involved in unit management].

This would result in HofLDs being involved in the core business in a way which is much more in line with their linguistic capacity [rather than, as suggested by the initial proposal, attempting to involve them by transforming them into horizontal/thematic ambassadors responsible for contacts with various partner DGs].

The main advantages of this approach is that it retains the successful and balanced core business structure under translating managers of the highest calibre, maintains the current facility for ensuring an efficient overview, improves communication, makes more appropriate use of the role of Head of Language Department and is supported by core business staff.

In order to minimise human cost:

1. A HofU post should be maintained for the Web unit,
2. Any remaining former translating HofUs should be redeployed as advisors assuming responsibilities for the thematic contacts with other DGs.
3. Any vacancies at Director level should be dealt without any further exceptional extensions of retirement age and by giving priority to internal candidates with acknowledged managerial and translating expertise [i.e. former Heads of Language Departments]

Although this revised version of the proposal does not overcome the problem of the advisors, it at least has the merit of not affecting the operational capacity of our core business units/departments and of avoiding incomprehensible and unwieldy asymmetry in terms of portfolio distribution and the size and location of various translating units.

Moreover, if the Cabinet authorises DGT to align the re-allocation of its management posts with that of the other DGs being asked to relinquish posts [12-15% instead of more than 23% as requested of DGT at present], the problem of the advisor role will be minimal since they will be able to continue their dual tasks as translating staff and HofUs.

It goes without saying that if, after verification with the Commissionaire's Cabinet, the re-allocation of management posts is on a less extreme scale – in line with the situation in other DGs – the proposal could be applied in a way which is less damaging still.

Last but by no means least, changes to the initial restructuring proposal along these lines would restore the credibility of senior management and the Director-General by demonstrating their ability to incorporate considerations and respond to concerns arising from the staff consultation process.

If the internal drivers analysed below were to prove irrelevant for change in DGT, the proposal above could be deemed complete and sufficient to deal with the staff cuts required.

B. INTERNAL DRIVERS

Principles for the analysis of internal drivers

As far as internal drivers are concerned, the proposal should be expected to include the following elements:

1. Excellence of past results [principle of "if it's not broken don't fix it"]
2. The importance of incorporating past lessons in current management practices [previous restructurings and their consequences, political decisions impacting on operational conditions due to the geographical distribution of DGT staff (e.g. the Kinnock-Pilfer agreement, the impractical location of DGT premises in Brussels).
3. 360 degree review of past performance for all layers of management [senior and middle management] based on the approach and principles proposed recently by DGT for staff evaluation in general [cf. proposals by DGT for the new staff evaluation and promotion system].
4. Thorough and, above all, timely consultation of all stakeholders on proposals, paying due attention to core business staff and their representatives (Permanent Delegation of Translators) in particular [given their specialist professional profiles (linguists) and their extensive experience and expertise].
5. Appropriate consultations should be expected to produce results in the form of revision of initial proposals on the basis of participatory [but not joint] management.
6. A cost-benefit analysis/impact analysis of all options considered, in line with the Commission's best practice standards for sound administration.
7. The need for consistent management in order to foster a working environment based on trust and avoid staff demotivation.

Analysis of possible internal drivers

If the initial proposal were judged on the basis of the above-mentioned set of principles 1-6, it would fare as follows:

1. No cost-benefit analysis/impact analysis seems to have been carried out [breach of point 6].
2. Consultation on the initial proposal occurred too late and was, evidently, far from being complete and fair (many translators felt excluded and resorted to presenting unsolicited opinions through petitions and notes [German, Greek etc departments, DPT petitions, Local Staff Committee notes, General Assembly resolutions, letters from staff and trade union tracts, as well as oral interventions and revealing, persistent applause during the General Meeting with senior management for all speakers intervening against the proposal].

In parallel, the current management structure comprising too many layers (translating staff-HofUs-HofLDs-Directors-Director-General) seems to have distorted the 'bottom up' message (Spanish Department), while critical but well substantiated comments by staff during meetings in the presence of the board of directors apparently did not translate into concrete changes and their reasonable questions remained largely unanswered [breach of points 4 and 5 above concerning genuine consultations producing concrete results].

3. Despite previous promises to reconsider the performance of senior management in the light of the results of an official survey at the end of 2011 suggesting that DGT directors are distrusted and disavowed by DGT staff to an extent which is abnormal in relation to average Commission standards, the initial proposal did not consider any structural downsizing or change at this level of hierarchy [same number of Director posts maintained] and even culminated in the inexplicable authorisation of an extension of the career of one of them beyond the normal retirement age.

Decisions made to remove high calibre and well trusted middle managers in core business and associated units [translating HofUs] were taken without 360 degree input from standard translators and the horizontal staff concerned regarding the extent of the post reductions, the timescales and the selection of the HofUs to be retained [breach of the point 3 above concerning bottom-up appraisal and choices on the basis of operational merit.].

4. Background: the consideration of the impact of previous policy decisions
 - a. The 2006-2007 restructuring of DGT resulted in a reduction in the size of all core business units and departments [depriving many of them of 25% of their operational posts and downsizing their middle management layer from seven to three HoUs per language department while multiplying the non-translating "semi"-senior management posts from seven Heads of Thematic Departments to ...23 Heads of Language Departments].
 - b. Support units [terminology] disappeared [together with the corresponding HoU posts] and the redeployment of their specialist staff proved complicated to say the least [the so-called "ghosts of terminology"].
 - c. Allegedly on account of lack of space, thriving single language libraries and archives with recognised added-value for core business were replaced by a multilingual central library and archives with very low user levels, less specialized staff and an inadequate number per language [the so-called "ghosts of the single language libraries" proved also difficult to redeploy].

Naturally, DGT's mass exodus from the heart of the Commission activities in Brussels to far fewer square meters in remote and poorly-connected Evere despite general opposition from staff and management did not help to improve the moral of the service at these levels either.

- d. Both campaigns to turn linguists to administrators [the so-called "mobility campaign"] and to make them translate into languages which they were unqualified for [the so-called "2way translation campaign"] failed disastrously, seriously discrediting senior management.
 - e. The organisational structure by language means that ten core business language departments are exclusively based in Luxembourg, since the Kinnock-Polfer agreement provides for some 50% of DGT staff to be based there for not operational but purely political reasons. This has cost DGT a legion of brilliant young translators who have been leaving for years now, and continues to act as an obstacle to the employment of high calibre staff for core business units, since they consider both the single location and the linguistic segregation unfair and unattractive and may therefore be discouraged from taking part in DGT selection procedures. It is said that this political agreement is unavoidable and impossible to reconsider despite the fact that it continually generates unjustified operational costs. Nevertheless, it would appear reasonable for DGT to at least make every effort not to extend the problem experienced by some horizontal units which are already split between Luxembourg and Brussels to core business units as well.

The impact of this recent background [recent and significant sacrifices at both standard and management post level, impossibility to recycle highly specialized staff and translating HoUs, operational and budgetary cost of political agreements in favour of Luxembourg] appears not to have been taken into account when the initial restructuring proposal was drawn up [breach of point 2 above concerning past lessons], since:

- i. the initial proposal provided for the dismantling of the Web unit despite its strong performance, including as regards efficiency of use of administrative resources [its administrative overheads are as low as 12.6%] and despite the fact that the web unit is the only way in which DGT can retain four or five translators for each of the ten language departments which are otherwise not represented at all in Brussels.
 - ii. it suggested that the double-location system even be extended to core business units, despite the obvious operational and budgetary drawbacks and the fact that this option is generally considered ill-advised by core business staff in terms of ensuring seamless operation of services, and
 - iii. it would distort the size balance for a great many other core business units by resorting to the creation of very large units in Brussels and small units in Luxembourg [or vice versa].
5. Given that the excellence of past results in both core and non-core business units have been repeatedly demonstrated by compliance with various performance benchmarks, including at times when demand was extremely high, the radical re-organisation of units and staff, as proposed by the initial proposal, seems to fly in the face of the established management principle of 'you don't change a winning team' [breach of point 1 above].
6. DGT field officers have been successful in their posts in DG COMM. They work under an arrangement [they belong to DGT, are former translators but DG COMM employs them as administrators on the basis of a DGT- DG COMM agreement] which was deemed to be a hybrid solution in order to re-affect translating staff to non-translating administrative posts as part of the 2007-2008 mobility campaign. Under the previous Director-General they were held up as models of good practice and repeatedly praised for their will to gear their careers towards less translation-based workloads. It is inconsistent to now promote a return to translation after having presented these new roles as models for so long and the dazzling perspectives that work in DG COMM would allegedly offer [breach of point 7 regarding consistent management and the importance of avoiding staff demotivation as a result of contradictory and whimsical management decisions].

On the basis of the above, it appears that the initial proposal did not take into account any internal drivers and could have an adverse affect on staff motivation. Consequently, the DGT restructuring should be viewed solely as a result of the external driver provided by the staff-cutting proposal under the current reform. A restructuring of this kind could be realised along the lines set out under part A of this document in order to minimize costs and maximize benefits for all stakeholders.