COUNCIL OF THE EUROPEAN UNION

Brussels, 31 August 2012

13270/12

FIN 617
STAT 31

COVER NOTE

from:	Mr Vítor CALDEIRA, President of the European Court of Auditors
date of receipt:	31 July 2012
to:	Mrs Erato KOZAKOU-MARCOULLIS, President of the European Council
Subject:	Special report No 10/2012: The effectiveness of staff development in the European Commission

Sir,

I enclose a copy of special report No 10/2012 entitled "The effectiveness of staff development in the European Commission" together with the Commission's replies.

The special report, which is shortly to be published, was adopted by the Court at its meeting on 22 May 2012 and is accompanied by the replies from the Commission, which was notified of the preliminary findings on 7 March 2012.

(Complimentary close).

(s.) Vítor CALDEIRA

Encl.: Special report No 10/2012: The effectiveness of staff development in the European Commission.[1]

[1] In English only. The other languages of this report are available on the European Court of Auditor's website: http://eca.europa.eu/.

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Special Report No 10/2012

(pursuant to Article 287(4), second subparagraph, TFEU)

The effectiveness of staff development in the European Commission

together with the Commission's replies

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GLOSSARY

Career development	The management of careers by individuals and organisations (e.g. through job moves and promotions).
Career guidance	Career guidance aims to help staff manage their careers e.g. by providing advice on how to make best use of their skills in line with their aspirations. Career guidance in the Commission is provided both at central level by the Central Career Guidance Service (SCOP) or at local level by the Local Career Guidance Officers (ReLOPs) appointed by each Directorate-General.
Certification	Procedure allowing officials from the Assistant (AST) function group to become members of the Administrator (AD) function group following successful completion of training and examinations.
Community of practice	A group of people with a common interest who interact regularly to share learning.
Competency	Skill or ability to carry out a task proficiently.
E-CV (electronic curriculum vitae)	A module of the Commission's human resource management information system where staff can input data on their work experience, education and skills.
E-learning	Computer-enabled learning.
EPSO (European Personnel Selection Office)	EPSO organises and conducts selection procedures on behalf of the European Union Institutions. The decisions to recruit successful candidates are taken by each Institution.
Formal learning	Intentional learning that is organised in terms of objectives e.g. instructor-led training or structured e-learning.
HR scorecard	Commission document showing a range of indicators concerning staff in post and vacancy rates
Informal learning	Learning which is not formally organised or structured e.g. coaching, on-the-job learning, sharing experiences with colleagues.
Inter-DG mobility	Mobility from one Directorate-General (DG) to another.
Intra-DG mobility	Mobility within the same Directorate-General (DG).

Job and competency planning instrument	Tool currently being developed to help identify future job needs in the Commission.
Job information system	System showing, for each post in the Commission, the experience, education and skills required to carry out the functions related to the job.
Knowledge	Familiarity with facts and information.
Learning and development	The process of acquiring or improving knowledge and skills.
Learning and development framework	Commission document identifying strategic training needs and planned training activities.
Learning environment	An organisational climate that encourages staff to participate in learning activities and supports them in applying new skills in the workplace.
Mobility	The movement of Commission officials from one job to another within the same Directorate-General (DG) or from one DG to another.
Performance level	One of five categories of performance resulting from the annual appraisal of the jobholder's efficiency, ability and conduct.
Promotion	Advancement to the next higher grade.
Screening exercise	Annual analysis of the balance between Commission administrative and operational staff.
Skills	Ability to carry out tasks proficiently.
Staff development	Includes training, formal and informal learning, job mobility and all other aspects of human resource management linked to improving the knowledge and skills of employees.
SYSLOG	The Commission's training management information system.
Training	Transfer of knowledge and skills.
Training coordinator (COFO)	In each Directorate-General, the member of the unit in charge of learning and development who is responsible for the design and implementation of the policy on learning and development. COFO meetings are regularly organised by the Directorate-General for Human Resources and Security (Human Resources and Security DG).

Training map	List of training courses to be attended in the coming year for each member of staff agreed with their Head of Unit.
Training path	A series of courses designed to allow learners to progressively improve their knowledge and skills.
Underperformance	Continued failure of a staff member to meet the requirements of their job – including meeting targets (efficiency) or providing a satisfactory service (abilities and conduct). In the context of the appraisal in the Commission, underperformance is defined as less than 9,5 points before 2008, or performance level IV from 2009 until 2011.
Workforce planning simulator	A tool which shows the probabilities, based on past records, of staff leaving a DG.

EXECUTIVE SUMMARY

I. The Commission depends upon its 33 000 staff in order to achieve its objectives. To perform effectively, staff need to acquire and maintain up to date skills through training, informal learning and job moves. This is particularly important in the Commission because of the long career and low turnover of its permanent staff (paragraphs 1 to 5).

II. In order to examine how effectively the Commission enables its staff to develop the audit addressed the following four questions (see paragraphs 6 to 7):

(a) Does the Commission align staff development with organisational needs?

(b) Does the Commission provide opportunities for staff to develop?

(c) Does the learning environment motivate staff to develop their skills and to apply them in the workplace?

(d) Does the Commission evaluate the effectiveness of the actions taken to develop staff?

III. The Commission does not have sufficient consolidated information on the existing skills of its staff or the skills which they need. The introduction of a new appraisal system in 2012 and further development of the electronic curriculum vitae (e-CV) aim to improve the information available on staff skills. The Commission's strategy for developing staff does not convincingly demonstrate how development actions will contribute to achieving the objectives of the organisation. Likewise, individual training maps were not sharply focused on them. Some skills gaps are not sufficiently addressed and managers consider that some development actions, such as some language courses and job moves, do not result in greater workplace effectiveness (see paragraphs 8 to 21).

IV. The Commission provides a wide range of opportunities for staff to develop through training, informal learning and job moves. In 2010 staff attended an average of 6,9 days formal training and spent an estimated 4 days on informal learning. Each year between 2005 and 2010 on average 6 % of staff moved to another DG. Staff also have considerable opportunities to change jobs within the same DG (see paragraphs 22 to 28).

V. The Commission has not created a sufficiently strong learning environment to capitalise on the extensive learning offer (see paragraphs 29 to 42):

(a) Commission systems do not closely monitor whether staff participate in planned development actions. In 2010 staff attended only 35 % of the courses planned in their training maps;

(b) Although Commission staff participated in an average of 6,9 days training in 2010, 30 % of staff participated in less than two days' training. Older staff on higher grades generally participate in less training;

(c) There are high absence and dropout rates from language courses;

(d) The Commission's own staff and managers deliver some training courses (16 % of general and IT training) but not enough to demonstrate that the organisation attaches a high value to staff development;

(e) There is only limited support to apply new skills in the workplace;

(f) The appraisal and promotion system in place until 2011 does not sufficiently distinguish between good performers who develop their skills and poor performers who do not. The new system introduced in 2012 aims to make a clearer distinction and not to promote those whose performance is below average.

VI. The Commission measures the satisfaction of staff with development actions. However, it does not assess whether staff have attended necessary training. Nor does it assess whether they have acquired new skills (with the

exception of language and certification training). There are some attempts to evaluate the utility of development actions in the workplace. However, these are mainly based on the opinions of staff. Managers are rarely asked for their opinion on the effectiveness of training undertaken by their staff and there is little use of objective indicators. The Commission does not evaluate the impact of development actions on organisational results. Consequently, it does not have the information necessary to demonstrate the contribution of development actions to achieving organisational objectives or to inform decisions on where to target learning and development resources (see paragraphs 43 to 58).

VII. On the basis of these observations the Court's main recommendations are that the Commission should (see paragraphs 59 to 68):

(a) ensure it has sufficient consolidated information on existing staff skills and on those needed to meet future challenges and prepare a strategy which convincingly demonstrates how learning and development will contribute to the achievement of organisational goals;

(b) support this process through improvements to the systems for planning training and job moves;

(c) develop its systems for monitoring participation in development actions;

(d) address the issue of underperformance and encourage greater participation in the wide range of development opportunities available while recognising staff who develop their skills and those of others;

(e) test and certify the acquisition of new skills where practicable, and support their application in the workplace by providing follow up activities;

(f) evaluate how effectively development actions provide staff with new skills which they are able to apply in the workplace.

INTRODUCTION

1. The Commission depends upon its 33 000 staff[2] to achieve its objectives. In order to perform effectively, staff need to acquire and maintain up to date skills. This is particularly important in the Commission because of the long career and low turnover of its permanent staff who represent 68 % of the workforce. The Commission can bring in fresh expertise in the form of certain types of staff on fixed-term contracts[3]. However, in the current context of staff reductions continuous personal and professional development is essential for staff to make their most efficient and effective contribution to meeting the objectives of the Commission.

2. Staff maintain and develop skills through training, informal learning and job moves. The annual budget of the Commission on external trainers and learning materials in 2010 was 26,6 million euro[4]. In addition, the annual investment in learning and development activities in 2010 included 230 000 staff days participating in training and the equivalent of 310 staff administering and delivering training and career development activities.

3. The Directorate-General in charge of Human Resources (Human Resources and Security DG) is responsible for identifying the strategic learning and development needs of the Commission as a whole. It is also responsible for managing the central training offer (training courses proposed to staff) including language training. Based on the central learning and development

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[2] Commission 2011 Key Figures Card. The 32 949 Commission staff on 1 June 2011 consisted of 22 526 officials, 1 402 temporary agents, 5 871 contract agents, 2 022 local agents, 54 special advisers and 1 074 agents under national law. The 22 526 officials consisted of 12 032 administrators (AD staff) of which 1 502 were managers, and 10 494 assistants (AST staff).

[3] Staff on fixed-term contracts include temporary agents, contract agents, local agents, special advisers and agents under national law.

[4] The 2010 training budget amounted to 31,1 million euro of which 4,5 million euro was for other institutions. It was reduced by 5 % in 2011 to 29,7 million euro and by a further 11 % in 2012 to 26,3 million euro.

strategy, Directorates-General (DGs) develop their own learning and development frameworks and manage the local training offer aimed at their own staff. Middle managers (Heads of Unit) are responsible for identifying the development needs of their staff.

4. Individual staff members are expected to play an active role in meeting the needs identified and in developing their personal potential. Responsibility for training is shared between the individual and the Institution[5].

5. The 2000 White Paper on Reforming the Commission[6] emphasised the importance of learning and development and led to the following key strategic documents:

(a) the 2002 Decision on Staff Training which aimed to increase the annual number of training days from 2,5 days in 2000 to 10 days in 2005;

(b) the 2002 Guidelines on Mobility[7] which highlighted the importance of job moves both for the development of the individual and for contributing to the achievement of organisational objectives;

(c) the new Staff Regulations of 2004[8] which introduced a career structure intended to offer staff clearer incentives for good performance.

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[5] Commission Decision E(2002) 729 of 7 May 2002 on Staff Training.

[6] COM(2000) 200 final of 5 April 2000.

[7] Guidelines on Mobility, Communication to the Commission SEC(2002) 146 of 12 February 2002.

[8] Council Regulation (EC, Euratom) No 723/2004 of 22 March 2004 amending the Staff Regulations of officials of the European Communities and the Conditions of Employment of other servants of the European Communities (OJ L 124, 27.4.2004, p. 1).

AUDIT SCOPE AND APPROACH

6. The audit examined how effectively the Commission enables its staff to develop through training, informal learning and job moves and how these actions are aligned with organisational objectives. The audit addressed the following four questions:

(a) Does the Commission align staff development with organisational needs?

(b) Does the Commission provide opportunities for staff to develop?

(c) Does the learning environment motivate staff to develop their skills and to apply them in the workplace?

(d) Does the Commission evaluate the effectiveness of the actions taken to develop staff?

7. The audit was based on:

(a) a review of documentation relating to the Commission's staff development policies, procedures and tools;

(b) structured interviews with Commission staff in the Directorate-General for Human Resources and Security (Human Resources and Security DG) and five selected Directorates-General: Communication DG, Development and Cooperation DG - EuropeAid, Environment DG, Information Society and Media DG, and Regional Policy DG. These interviews were followed up with written notes of the meetings agreed with the DGs concerned. The five DGs were selected from different areas of Commission activity in order to provide a representative cross-section of systems and opinions;

(c) a survey of 227 middle managers (mainly Heads of Unit) in the five selected DGs. The survey asked their views on various aspects of staff development. 127 managers (56 %) replied to the survey, representing

10 % of all Commission middle managers. In addition the audit examined the results of the Commission's own Staff Opinion Survey, carried out every two years, most recently in 2010[9];

(d) an analysis of statistics generated from Commission HR systems on various aspects of staff development;

(e) a review of previous evaluations relating to aspects of staff development in the Commission.

[9] 2010 Staff Opinion Survey among Commission staff.

OBSERVATIONS

The Commission has insufficient consolidated information to closely align staff development with organisational needs

8. In order to align staff development with the needs of the organisation the Commission needs reliable information on existing skills and on those needed to meet current and future challenges. This information is necessary to produce a strategy which links development actions with policy objectives. Such a strategy provides a framework for planning the development of individual staff. The audit therefore examined whether the Commission has sufficient information on staff skills enabling it to produce a staff development strategy and individual development plans in line with the needs of the organisation.

The Commission is gradually improving systems to provide consolidated information on existing and required skills

9. The Commission has three main systems for providing information on the existing skills of its staff:

(a) Recruitment assessments: as part of the recruitment process all new Commission staff are assessed by the European Personnel Selection Office (EPSO) against eight core competencies. The results of the assessment are recorded on a competency passport;

(b) Annual appraisals: throughout their career the conduct, ability and efficiency of staff in carrying out their job is assessed in the annual appraisal[10]. A new appraisal system was used from January 2012 onwards;

[10] Annex I, Article 43 of Regulation (EC, Euratom) No 723/2004.

(c) Electronic curriculum vitae (e-CV): staff can also record knowledge, skills and experience acquired from current and previous jobs on their e-CV. This provides information on their potential to work in other roles.

10. These systems do not combine to produce a reliable, consolidated picture of the skills of Commission staff. The EPSO competency passport is available for staff recruited since 2010. It examines skills in a different structure to that of the annual appraisal in use until 2011 (see ***Figure 1***). As a result it is not updated or followed-up during the appraisal process. The Commission will use the same framework of eight competencies as EPSO in the new appraisal process introduced from 2012 allowing easier alignment between the two tools.

Figure 1 – Structure of skills assessed by annual appraisal in use until 2011 and EPSO competency passport for new recruits

Annual appraisal until 2011		EPSO competency passport for new recruits
Efficiency	Organising and planning work	Prioritising and organising
	Performing work and ensuring quality	Delivering quality and results
Ability	Technical skills	
	Oral and written communication	Communicating
	Communication in meetings	
	Negotiation skills	
	Analysing problems and applying solutions	Analysis and problem solving
	Awareness of the working environment	
	People management	
Conduct	Teamwork	Working with others
	Service culture	
	Commitment to the job	
	Personal development in the context of work	Learning and development
	Leadership	Leadership
		Resilience

Source: European Court of Auditors (ECA) analysis of criteria used in Commission annual appraisal and in EPSO competency passport.

11. The annual appraisal and promotion system in use until 2011:

(a) awarded points to staff which they accumulate in order to achieve promotion (advancement to the next higher grade) when they have reached a pre-determined threshold of promotion points. Considerations relating to promotion dilute the performance focus of the appraisal[11];

(b) does not reliably identify underperforming staff[12]. Since 2004 only 37 cases of underperformance have been identified through the appraisal system (relating to 28 different people). In 2010 there were three cases of underperformance out of some 21 700 permanent staff appraised. An indication that underperformance is in reality more widespread is the fact that 32 % of middle managers responding to the audit survey stated that they had faced situations of underperformance.

12. The e-CV can be used to make informed decisions on staff moves and so enable staff to work in jobs where they can apply or develop their skills. Such a tool is particularly important because only half of staff movements take place following published vacancies[13]. It can complement the existing information

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[11] The promotion points awarded can be influenced by how close a person is to promotion rather than being an objective assessment of performance. In order to maximise promotions within a DG, individuals may be awarded promotion points which they do not merit. In reply to the audit survey of middle managers, some respondents highlighted the difficulty of providing an objective appraisal because of the influence of the promotion exercise.

[12] Underperformance is defined as performance level IV. Commission Decision C(2008) 3028 of 18 June 2008 on general provisions for implementing Article 45 of the Staff Regulation describes the performance levels.:
- Performance level IA: consistently exceeded expectations with regard to efficiency, ability and conduct in the service;
- Performance level IB: frequently exceeded expectations;
- Performance level II: fully met expectations;
- Performance level III: partly met expectations;
- Performance level IV: did not meet any expectations.

[13] The most recent progress report on mobility in 2007 showed that half of staff movements (1 350 out of 2 700) were reassignments under Article 7 of the Staff Regulation rather than published vacancies under Article 29.

from informal networks and personal contacts. Although it has been the Commission's human capital database since 2007[14], the Commission has not developed a simple and effective search tool for the e-CV, has not formally launched it or asked staff to complete it. By the end of 2010 only 25 % of staff had completed their e-CV. Of these, only 20 % allowed all Commission managers to access it. Consequently, managers can see the e-CVs of only 5 % of staff.

13. The Commission has a number of systems to help DGs to identify the skills they need to meet current and future challenges. These include the workforce planning simulator, the HR scorecard, the screening exercise and the job information system (see the ***Glossary*** for a brief explanation of these tools). However, the systems currently focus on staffing numbers, and DGs lack systems to specify the future skills they require. The Commission is developing a job and competency planning instrument (not yet in production) which is intended to help DGs develop strategic HR plans which identify the skills needed to achieve policy priorities.

The central top-down strategy does not convincingly demonstrate how staff development will contribute to achieving the objectives of the organisation

14. The last multi-annual strategic document on learning was the 2002 Decision on staff training. A strategy for 2012 to 2015 is currently being prepared. In the meantime, the Commission produces a learning and development framework annually. These annual frameworks emphasise the quantitative target of 7,5 days formal learning[15] and 2,5 days informal learning. They do not make a strong link with the Commission's policy objectives. For example, they do not articulate the objectives of language training, which accounts for one third of

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[14] European Commission Human Resources Report 2011, p. 73.

[15] The target of 7,5 days formal learning consists of 3,5 days general training, 1,5 days IT training and 2,5 days language training.

the proposed formal training offer, in terms of the working needs of the organisation. The annual learning and development frameworks produced at DG level make a stronger link between training and the objectives of the organisation. They explain how the decentralised training provided at DG level aims to contribute to meeting the DG's objectives.

15. Moving jobs is a way for staff to develop and learn new skills. The 2002 Guidelines on Mobility stressed that job moves should benefit both the organisation and the individual. The Commission has recognised for some years[16] that a more active mobility policy is required so that job moves address organisational needs and not only the considerations of the individual staff member[17].

16. However, there is no multi-annual plan for developing staff through job moves in order to contribute to meeting organisational objectives. There are, however, some initiatives which aim to better align mobility with organisational objectives. For example, Regional Policy DG has plans to establish a Professional Development Committee which aims to align staff moves with policy objectives by filling vacancies in a way which best meets the needs of the service.

Bottom-up planning through training dialogues, training maps and career guidance is not sharply focused on organisational objectives

17. The middle manager has an important role to play in ensuring individual requests for learning and development correspond to organisational needs. Managers discuss learning needs with their staff annually, in the context of the annual appraisal, resulting in individual training maps (see ***Figure 2***). Training

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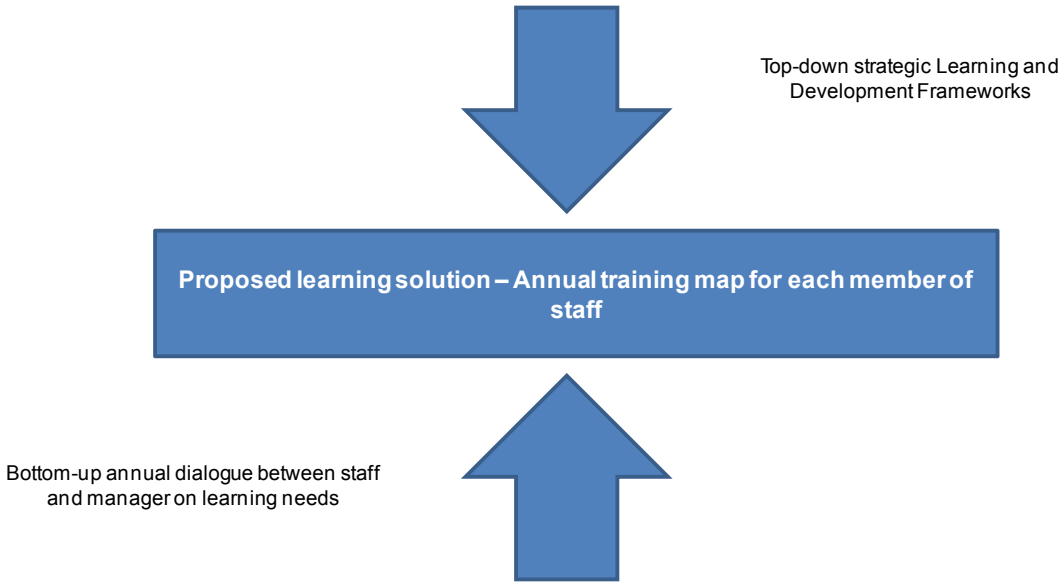
[16] Implementation of the Mobility Policy in the Commission Progress Report for the Year 2006, July 2007 and Implementation of the Mobility Policy in the Commission Progress Report for the Year 2005, July 2006.

[17] European Commission Human Resources Report 2011, p. 74 to 75 and IAS Report on human resources management 2006.

paths exist for some posts, which provide guidance on the recommended and optional training.

Figure 2 – Systems for planning training



Source: ECA on the basis of Commission procedures.

18. The audit survey of middle managers found that 90 % of respondents thought that training maps took into account the needs of both the individual and the organisation. In terms of individual needs, 75 % of staff stated that the learning offer met their needs in the 2010 Staff Opinion Survey [18]. However, in terms of organisational needs, the audit survey of middle managers found that respondents considered that training in staff appraisal was more helpful in assessing past performance than in identifying future development needs. Only 44 % of respondents considered the training in staff appraisal helped them to define training maps for their staff. The 2010 Staff Opinion Survey found that only 42 % of staff agreed that their manager supported them in helping to identify training and development needs[19].

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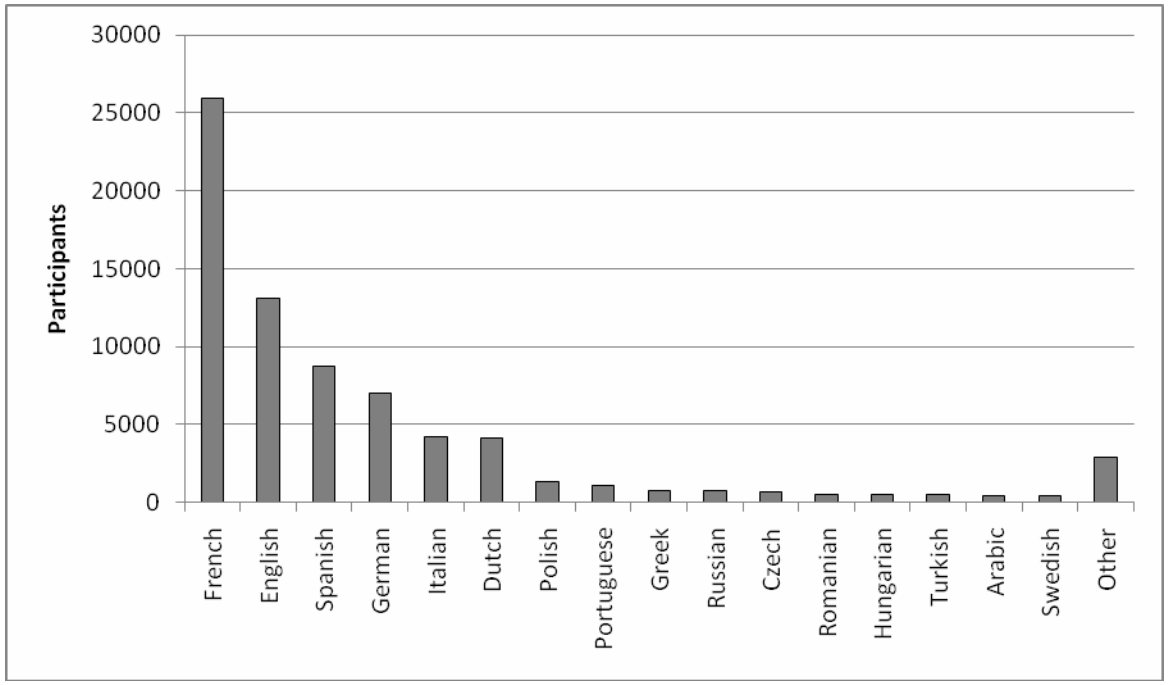
[18] 2010 Staff Opinion Survey, p. 31.

[19] 2010 Staff Opinion Survey, p. 25.

19. There is evidence of some training which is not sharply focused on organisational needs:

(a) Language training represents one third of target training days (see paragraph 14). The audit survey of middle managers found that 36 % of respondents did not consider that language training helped staff to do their job better (compared with 12 % of respondents for IT training and 14 % for general training). ***Figure 3*** shows the number of participants in different language courses between 2004 and 2010. The most widely used languages in the workplace are French and English, and these accounted for 35 % and 18 % of all language courses respectively. Other languages are generally less directly or immediately useful in the workplace though may have medium to long-term benefits.

Figure 3 – Participants in language courses 2004 to 2010



Source: Human Resources and Security DG.

(b) Although the training offer in the form of the training catalogue is intended to respond to overall training needs, staff may choose more attractive courses rather than those which correspond to their real needs (e.g.

training in mind-mapping or improving collaboration rather than financial procedures). From 2012 the Commission stopped using training maps. It has replaced them with a section on learning in the annual appraisal report. This identifies useful training for the future, rather than selecting specific courses from the catalogue to be attended in the coming year. This is intended to strengthen the link with the objectives of the organisation;

(c) In two of the five DGs interviewed, managers sometimes use training as a form of soft reward and to compensate for limited career prospects;

(d) Only 56 % of staff in delegations considered that the learning offer met their needs[20], compared with 75 % in the Commission as a whole (see paragraph 18). The Court's Special Report 1/2011 highlighted a lack of expertise in delegations in the areas of macroeconomics, public finance management, health and education despite their importance for the Millennium Development Goals and poverty reduction[21].

20. In the absence of a strategy for developing staff through job moves, managers and career guidance services have an important role to play in aligning job moves with organisational goals. However, although the annual appraisal provides an opportunity for staff and their line managers to discuss future plans, there is no record of career development plans. Such plans could be used in conjunction with the e-CV to make informed decisions on staff moves.

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[20] 2010 Staff Opinion Survey, p. 164.

[21] Paragraph 44 of Special Report No 1/2011 Has the devolution of the Commission's management of external assistance from its headquarters to its delegations led to improved aid delivery? (http://eca.europa.eu)

21. Although staff who consult the central career guidance service (SCOP) are generally satisfied with the quality of the advice[22], most staff are not aware of the services offered[23]. The Commission also runs a training programme in preparation for changing posts which was attended by 150 staff in 2010 (whilst some 3 000 staff move jobs each year). Some DGs, for example Communication DG (see ***Box 1***), have an active local career guidance function (ReLOP). However, the local career guidance function in three of the five DGs interviewed has minimal staffing (e.g. the equivalent of 0,1 full-time staff in Development and Cooperation DG - EuropeAid and Information Society and Media DG and 0,2 in Environment DG), lacks information on supply and demand, deals mostly with problem cases and is not intended to support mobility. As a result, Commission staff generally plan and manage their own careers through job changes and there is a risk that job moves may not be aligned with organisational needs.

Box 1 – Career guidance in Communication DG

There are two career guidance officers in Communication DG who proactively provide a range of advice and seminars. The career guidance service aims to be part of a general process of career development and not only to be used to help resolve urgent problems following conflicts. Around 90 Communication DG staff members used the career guidance service in 2009 and 80 in 2010.

The career guidance service offers impartial, confidential advice and guidance on:

(a) how to make better use of skills or how to strengthen them;

(b) how to identify personal strengths and weaknesses;

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[22] The client satisfaction survey October 2009 to March 2010 found that 88 % of SCOP customers were satisfied and 72 % thought the advice given in the interview clarified their situation.

[23] The 2010 Staff Opinion Survey found that 67 % of staff were not aware of the services offered by the SCOP.

(c) how to face new challenges;

(d) how to present a CV;

(e) how to write a letter of motivation;

(f) how to prepare for interview with a selection panel.

As well as services to individuals, the career guidance service organises events for groups of staff, for example, career guidance seminars for staff concerned by rotation (compulsory mobility) and seminars for women interested in becoming managers.

The career guidance service has also put in place a “Welcome team” for newcomers. This contacts newcomers and provides them with information at the time of their arrival, and then follows this up with conversations a few months, and then one year, after their arrival.

Fourteen months before the rotation date, the career guidance service contacts those affected by compulsory mobility to find out their job preferences. It encourages these officials to update their e-CVs and tries to meet them when they are in Brussels. The career guidance service also promotes, in Headquarters, the future vacant posts in the Representations. To evaluate the effectiveness of the rotation exercises the career guidance service contacts staff a short time after rotation and then nine months later to ask them about their motivation and integration.

Source: ECA on the basis of interviews with Communication DG.

The Commission provides a wide range of opportunities for staff to develop

22. To enable staff to develop, it is necessary for them to have access to appropriate training and opportunities to move jobs. The audit therefore examined whether the Commission provided sufficient learning and development opportunities for its staff.

The Commission's learning offer is extensive

23. The Commission offers an extensive range of formal learning opportunities. Human Resources and Security DG organises language training centrally for all Commission staff. It also aims to organise general training (e.g. HR policies, personal development and financial procedures) where this is the most cost-effective or appropriate approach[24]. In addition DGs organise training locally mainly for their own staff. DIGIT is the Directorate-General responsible for IT training and the European Administrative School (EAS)[25] is responsible for training in induction, certification and management. ***Figure 4*** shows the number of trainer days and participant days for the three main categories of training (general, IT and language training)[26] organised at central and local level.

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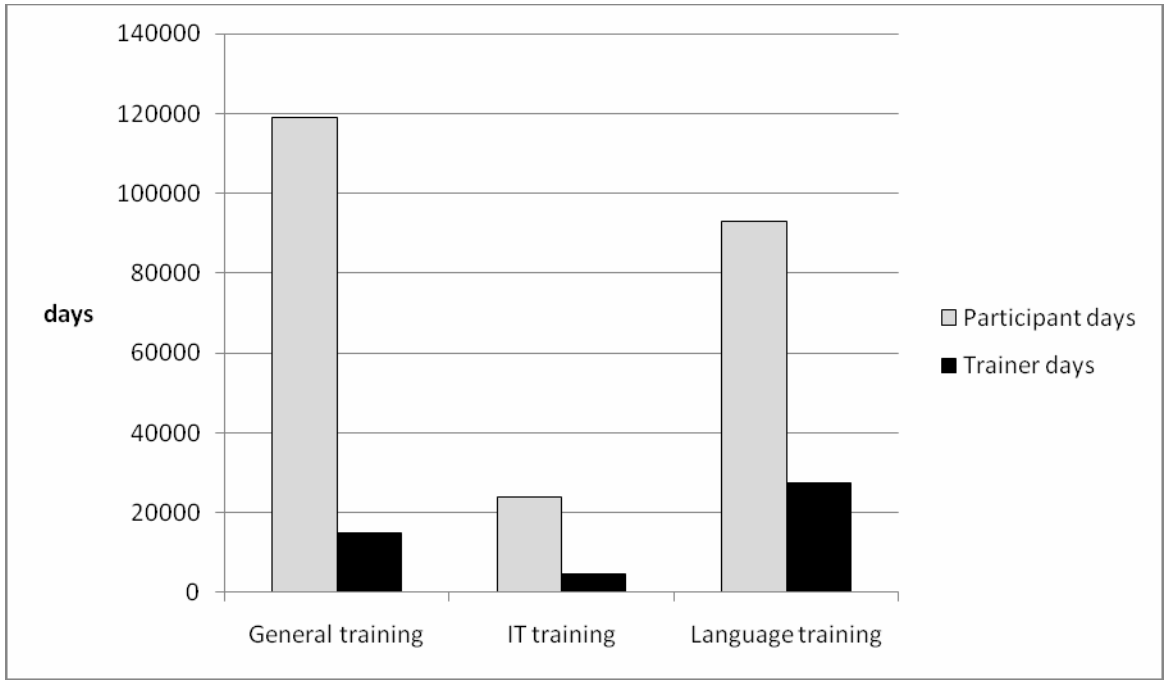
[24] The Learning and Development Unit is composed of 65 staff (55 in Brussels and 10 in Luxembourg). Its main task is to provide general and language training, largely contracted out. In 2008 it committed 14,3 million euro for organising 4 000 courses with some 133 000 participant days (about 25 % of the courses and 50 % of the participant days of all Commission training).

[25] The European Administrative School formally came into existence in 2005. Its mission is to provide high quality training and learning opportunities that meet the needs of all EU institutions and their staff.

[26] Language training is provided for all institutions and so in addition to Commission staff there are participants from other institutions not included in ***Figure 4***.

Figure 4 – Trainer days and participant days 2010



Source: Human Resources and Security DG.

24. E-learning is being developed at both central (Human Resources and Security DG) and local level (other DGs), often blended with coaching or a classroom-based exchange of best practice. Human Resources and Security DG has established a team of three staff to provide central guidance on e-learning. Across the Commission, e-learning represented 0,7 % of participant days in 2010 (1 700 out of a total of 236 000 participant days). Human Resources and Security DG offers a variety of e-learning courses on soft skills and has also introduced an e-learning option for some language courses. Development and Cooperation DG - EuropeAid has developed a number of e-learning courses for staff serving in delegations, and e-learning represented 6 % of its participant days in 2010, up from 3 % in 2009.

25. Training is coordinated by the community of training coordinators (COFOs) which holds formal meetings every six weeks. DGs frequently open their courses to other DGs (for example, 20 % of the participants of Regional Policy DG's courses come from other DGs). Development and Cooperation DG - EuropeAid makes learning available not only to other DGs, but also to other

Institutions and international organisations (see ***Box 2***). However, the extent of coordination varies and there are practical constraints. For example, Communication DG restricts its locally organised and financed courses to its own staff, despite the interest of other DGs in attending. Also, DGs do not have access in the Commission's IT system for managing training (SYSLOG) to details of all courses organised by other DGs. They are therefore not able to check in SYSLOG if a course which they are planning to develop already exists.

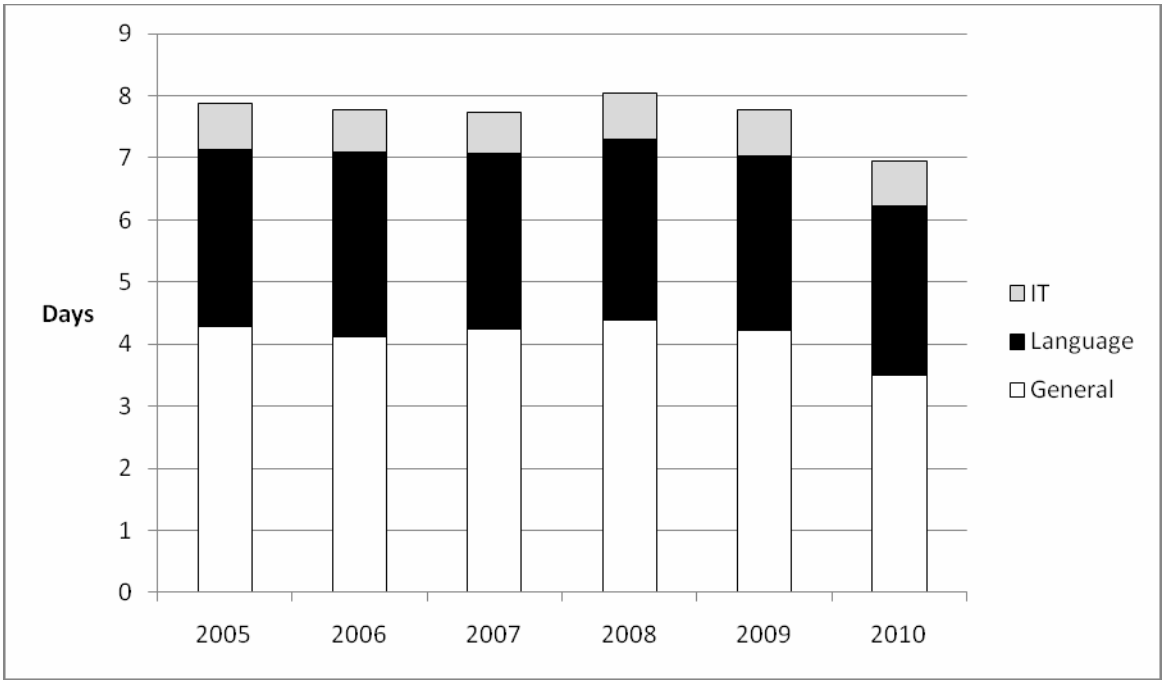
Box 2 – Cooperation with other organisations

Development and Cooperation DG - EuropeAid cooperates with other international organisations through the Joint Donors Competence Development Network (Train4Dev). The network was established in 2003 and consists of some 30 major development aid agencies. The network aims to improve aid effectiveness through enhanced donor cooperation in competence development and training. It designs and delivers joint training in areas critical to the development agenda. Members open some of their courses to other members' staff.

Source: ECA on the basis of interviews with Development and Cooperation DG - EuropeAid.

26. From 2005 to 2009 Commission staff participated in an average of almost 8 days formal training per year (see ***Figure 5***). In 2010 the average was 6,9 days (consisting of 3,5 days general training, 2,7 days language training and 0,7 days IT training). The drop in 2010 reflects the recent tendency to reduce the duration of individual courses in order to minimise absence from the workplace.

Figure 5 – Average number of days training per staff member



Source: Human Resources and Security DG.

27. To complement the formal learning offer for general, language and IT training, the Commission also encourages informal learning (e.g. coaching, on-the-job learning, sharing experiences with colleagues and self-study in the Learning Centre[27]). The target of 10 training days per year includes 2,5 days of informal learning (see paragraph 14). Although informal learning is not recorded in SYSLOG, the audit survey of middle managers found that respondents spent an average of some 5 days in 2010 participating in informal learning activities[28]. Those respondents who could make an estimate, replied that their staff spent on average some 4 days on informal learning.

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[27] The Learning Centres in Brussels and Luxembourg offer a range of different learning aids which can be studied on site or borrowed.

[28] For example, participants in the External Management Development Programme share the learning by giving a Management Matters Live lunchtime session, writing an article for the monthly Management Matters Live publication or producing a video for the Learning Channel. Participants in the Fellowships Programme present their research by videoconference from their university. On their return they draw up a report of their research.

Staff have opportunities to develop by changing jobs

28. Opportunities for career development through moving jobs are available to staff in the Commission. The 2002 Guidelines on Mobility encourage staff to move every 5 years, which would imply an average annual mobility of 20 %. Between 2005 and 2010, the inter-DG mobility rate was around 6 % (in the order of 1 400 staff) per year[29]. Statistics on staff who move jobs within the same DG are not available. However, the most recent progress report on mobility in 2007 showed that intra-DG mobility represented some 60 % of all mobility[30]. This would mean an intra-DG mobility rate of 9 %.The resulting overall mobility rate of 15 %, represents satisfactory progress towards the guidance of 20 %.

The Commission has not created a sufficiently strong learning environment to capitalise on the learning offer

29. Although the Commission provides extensive opportunities for development, this does not necessarily mean that staff participate in these activities. Furthermore, mere attendance at training courses is not proof of increased ability and does not necessarily impact on effectiveness in the workplace. The audit therefore examined the extent to which staff actually took part in development activities and whether the Commission supported them in applying new skills at work. The audit examined whether the Commission motivated staff to take part in development activities by monitoring participation and giving sufficient recognition to staff who demonstrated a commitment to self development.

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[29] The figures exclude mobility resulting from the reorganisation of services at the beginning of the mandate of the current Commission which affected some 1 730 posts (Draft General Budget of the European Commission for the Financial Year 2012: Working Document Part II: Commission Human Resources, p. 67.)

[30] Implementation of the mobility policy in the Commission Progress report for the year 2006, July 2007.

There are varying rates of participation in development activities

Staff attend 35 % of the courses planned in their training maps

30. In 2010 staff attended only 35 % of training courses planned in their training maps. The Commission suggests that part of this non-fulfilment is because staff attend other courses than those listed in the training map which meet the same learning needs. Also, staff training needs change during the year, for example, due to a job move or a change in responsibilities. Nevertheless, there is a significant difference between the learning needs identified in the training maps and the courses attended in practice. The 2010 Staff Opinion Survey found that only 58 % of respondents felt their managers supported them in attending the training agreed in their training map[31] (down from 79 % in 2008).

There are high absence and dropout rates from language courses

31. In 2010 levels of absences[32] were 9 % for general training, 11 % for IT training and 29 % for language training. They have remained at similar levels since 2005. The duration of language courses (two weeks for intensive courses and four months for twice-weekly courses) partly explains their high rates of absence. Language courses were also considered the least useful by respondents to the audit survey of middle managers (see ***Figure 6***). In order to reduce absence rates in language courses, the 2003 evaluation of inter-institutional language training recommended that language training should only be allowed if the language was needed at work[33]. Participation in training which is not useful incurs unnecessary costs in terms of the time spent by the participant as well as the cost of the trainer.

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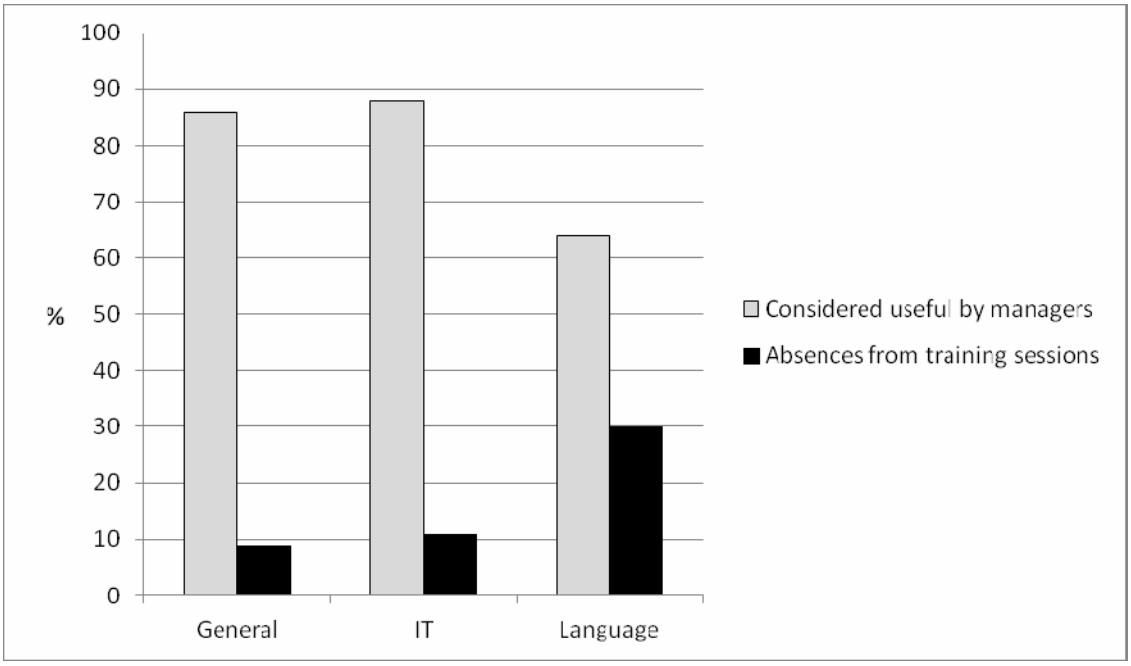
[31] Staff Opinion Survey 2010, p. 25.

[32] Those registered for courses who do not attend at least partly are recorded as absent. For language courses, absences are recorded for each lesson missed.

[33] The evaluation found that a quarter of managers agreed to language training in languages other than the main languages used for work purposes.

Figure 6 – Usefulness and absences



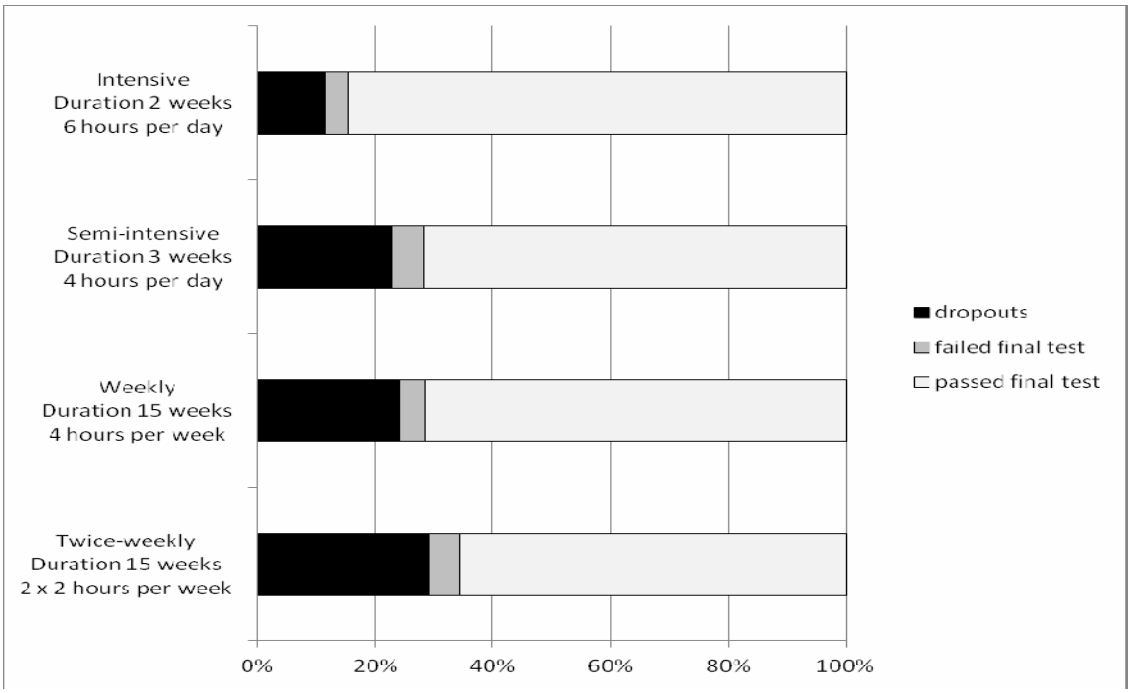
Source: Human Resources and Security DG and audit survey.

32. In 2010, 23 % of participants dropped out of language courses [34]. The dropout rate increases depending on the duration of the course and for twice-weekly courses over 15 weeks amounted to 28 % (see ***Figure 7***)[35]. Dropouts and absences increase the cost per participant in training. At the end of 2011 the Commission launched a pilot e-learning project to offer a more flexible approach to learning for five languages, partly to address the problem of absences and dropouts from language courses.

[34] Participants are automatically excluded from the language course they are attending if they reach a certain number of absences.

[35] Twice-weekly courses represented 48 % of all language courses in 2010.

Figure 7 – More dropouts from language courses of longer duration (2010)

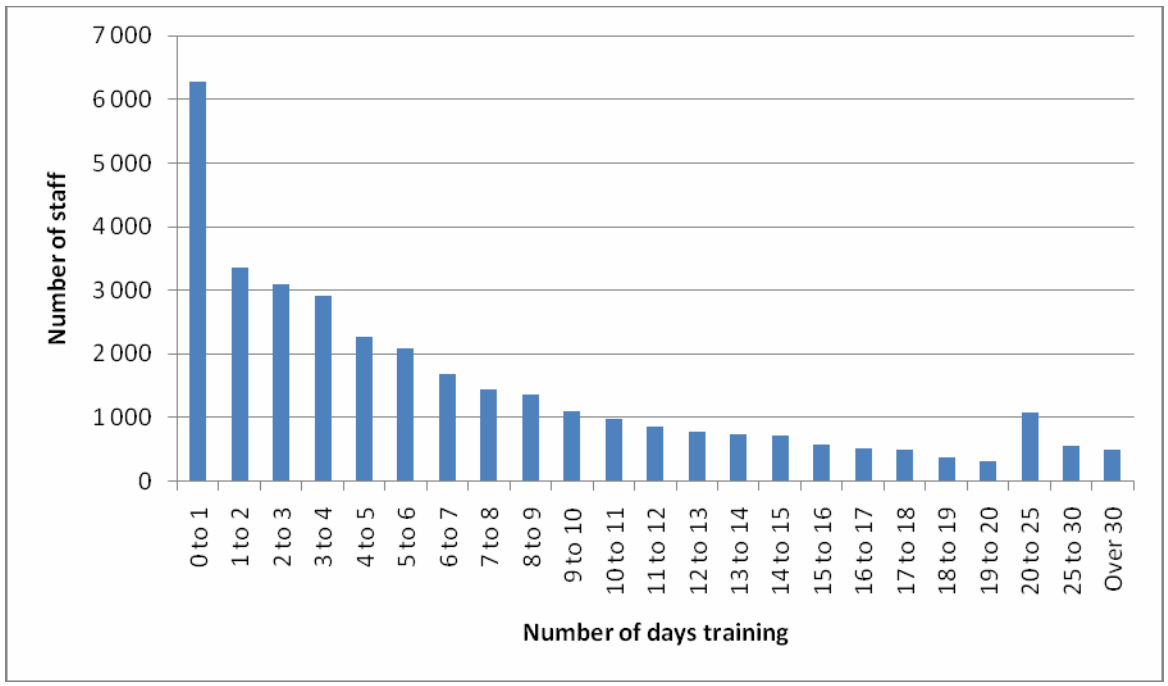


Source: Human Resources and Security DG.

Older staff on higher grades take part in fewer development actions

33. Although Commission staff participated in an average of 6,9 days' training in 2010 (see paragraph 26), 30 % of all staff participated in less than two days' training. ***Figure 8*** shows the range in the number of days training attended by Commission staff in 2010.

Figure 8 – Range in number of days training attended in 2010



Source: Human Resources and Security DG.

34. ***Figures 9*** and ***10*** show that younger staff on lower grades participate in most training. On first starting work in the Commission they are required to attend induction courses. Older and higher grade staff in the Commission participate in less training. Some older staff also perceive difficulties in finding other posts to move to[36]. The 2008 evaluation of older staff in the Commission highlighted the difficulty of managing and motivating high grade non-management staff in their fifties. The extended working life in the proposed revision of the Staff Regulations[37] will further increase the importance of motivating older staff to develop their skills.

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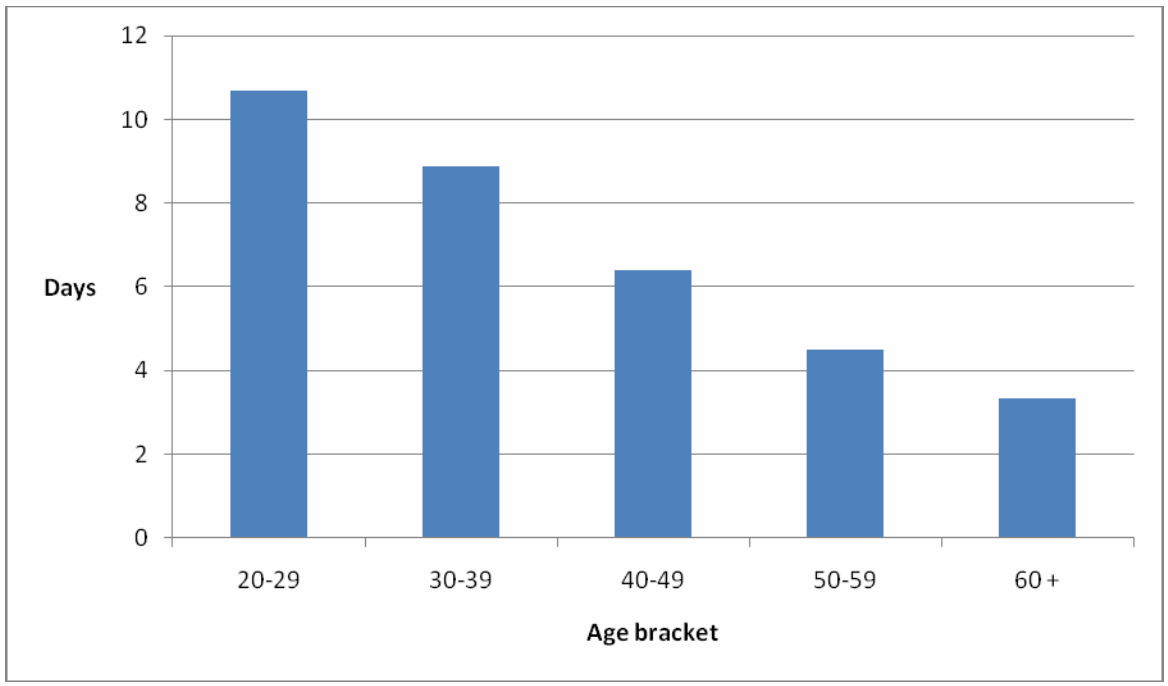
[36] Evaluation of the Involvement and Motivation of Older Commission Staff (above 50 years), November 2008, Executive Summary, p. vii.

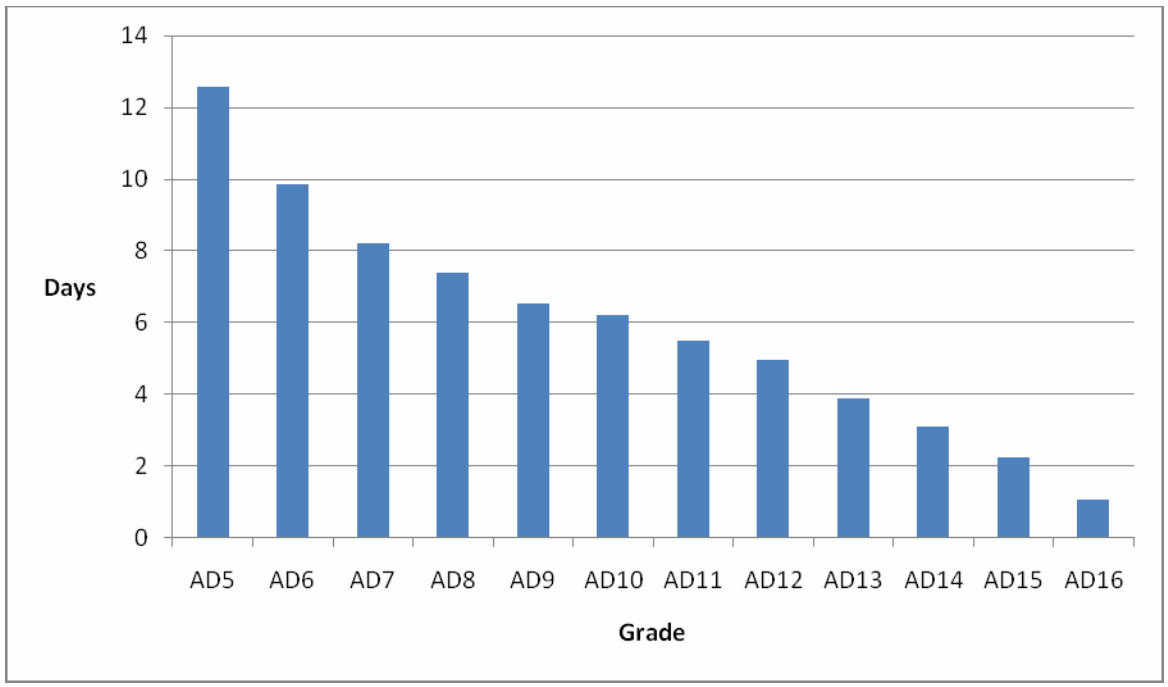
[37] COM(2011) 890 final of 13 December 2011 - Proposal for a Regulation of the European Parliament and the Council amending the Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Union.

Figure 9 – Training days by age in 2010



Source: Human Resources and Security DG.

Figure 10 – Training days by grade in 2010 (higher grade staff have a higher AD number)



Source: Human Resources and Security DG.

Commission systems provide insufficient information on staff participation in development actions

35. SYSLOG does not provide information on compulsory courses which staff should attend, for example those for new managers or new recruits. Of the five DGs interviewed, only Regional Policy DG monitored whether staff had registered for and attended the compulsory courses they should have [38]. The audit survey found that all managers in Regional Policy DG had attended the compulsory training for new managers compared with an average non-attendance rate across the 5 DGs of 28 %[39].

36. Human Resources and Security DG monitors staff movements between DGs but not within DGs[40]. Progress reports on mobility were produced until 2007 and included data on intra-DG mobility. The section on mobility in the annual HR report does not cover intra-DG mobility.

The Commission's own staff do not deliver sufficient training and coaching.

37. The involvement of an organisation's own staff in the delivery of training reflects the value which it attaches to learning[41]. It can also help to make training more practical and therefore, in the view of the respondents to the audit

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[38] Internal Control Standard 4: Staff evaluation and development, requires that "management ensure that every staff member attends at least the training courses of a compulsory nature as defined in the strategic frameworks of the Commission and the DG".

[39] Of these, 26 % were Heads of Unit for less than a year and so may not yet have completed the training. A further 31 % had over 4 years experience as Head of Unit and so may not be considered "new". The remaining 43 % were Heads of Unit between one and three years and so they should have attended the full compulsory management training programme.

[40] Internal Control Standard 3: Staff Allocation and Mobility, requires mobility to be monitored in order to ensure that the right person is in the right job at the right time.

[41] The 2000 White Paper on Reforming the Commission recommended more training by the Commission's own staff as a means of promoting a learning culture.

survey of middle managers, more effective. When staff deliver training they are required to update their knowledge, so that training itself becomes a learning activity. The managers replying to the audit survey delivered an average of 0,8 days training in 2010, equivalent to 1 200 days across the Commission. Commission staff delivered a further 1 800 days training. Together, Commission staff and managers delivered 16 % of the 19 000 trainer days for general and IT training (see ***Figure 4***). The level of involvement varies between DGs. Regional Policy DG and Information Society and Media DG, for example, use internal trainers to deliver most of their local training courses. The 2010 Staff Opinion Survey found that only 27 % of staff considered that their manager coached them on a regular basis[42].

The Commission provides limited support to apply new skills in the workplace

38. The annual appraisal provides an opportunity for staff and managers to discuss the impact of training followed. However, support to apply learning in the workplace and follow-up activities to reinforce learning are limited to a small number of programmes (see examples in ***Box 3***).

Box 3 – Examples of follow-up activities to reinforce and apply learning

The external management development programme uses business schools. Participants complete a pre-course questionnaire, an evaluation directly after the training and a further evaluation three months later. These all ask participants how they expect to implement, or how they have implemented, the learning in their day-to-day work and how much their performance has improved.

Participants in the negotiators' learning path have an individual feedback session with the trainer after the initial 5-day seminar. Once they have completed the fundamental negotiation skills trainings they become a member of the Negotiators' Club and can

[42] 2010 Staff Opinion Survey, p. 25.

access advanced courses. The members of the Negotiators' Club receive information on negotiation learning events and literature on negotiating skills.

Development and Cooperation DG - EuropeAid aims to send follow-up messages over a longer time period in order to reinforce training and keep learning alive. Training courses have a practical focus which emphasise the applicability of the learning content because staff are required, in order for the organisation to function effectively, to use the acquired skills and knowledge in the workplace.

Source: ECA on the basis of interviews with Human Resources and Security DG and Development and Cooperation DG - EuropeAid.

39. The 2010 Staff Opinion Survey found that only 45 % of staff considered that their manager supported them in implementing learning in the workplace (down from 61 % in 2008). Only 25 % of staff considered there was strong support in their DG to help them implement what they had learnt[43]. The audit survey of middle managers found that only 18 % of respondents had participated in follow-up activities for management training. 53 % said they needed more so that they could apply it more effectively in the workplace.

The Commission does not sufficiently recognise staff who learn and apply new skills

40. Staff who learn and apply new skills should improve their performance. The administrative reform launched in 2000 aimed to base promotion more on merit[44]. However, promotions continued up to 2011 to be based on elements not solely related to performance, for the following reasons:

[43] 2010 Staff Opinion Survey, p. 25.

[44] Reforming the Commission: A White Paper – Part II: Action Plan, p. 28.

(a) the Staff Regulations provide for a certain proportion of staff to be promoted within a certain time[45];

(b) the promotion system in use until 2011 was based on the allocation of points on the basis of the performance level achieved. Promotion points were cumulative over the years and promotion was awarded on passing a threshold of points.

41. Furthermore, managers consider the measures for dealing with underperformance to be ineffective:

(a) The audit survey of middle managers found that only 11 % of respondents considered that the measures for identifying and dealing with underperformance were effective;

(b) Only 32 % were confident that they would receive the necessary support in tackling underperformance;

(c) Several free-text comments received in response to the audit survey of middle managers highlighted the ineffectiveness of measures to address underperformance;

(d) Underperformers are rarely classified as such in the appraisal process (see paragraph 11);

(e) Managers cited cases where they allocated the work of underperforming staff to others and facilitated their move somewhere else. If underperforming staff are in the wrong job or have developed unconstructive working relationships, moving jobs may help to resolve the problem, although it might just transfer it somewhere else;

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[45] Annex I of Regulation (EC, Euratom) No 723/2004, Annex IB and Commission Decision C(2008) 3028 of 18 June 2008 on general provisions for implementing Article 45 of the Staff Regulations, p. 7.

(f) Under the appraisal and promotion system in use until 2011, provided they were not formally classified as underperformers in the appraisal system[46], underperforming staff could still be promoted once they had accumulated the necessary points: this could have a demotivating effect on other staff[47].

42. By blurring the line between good performance and poor performance, the former promotion system in use until 2011 reduced the incentive for staff to keep their skills up to date[48]. Furthermore, a specific provision in the Staff Regulations which requires training to be taken into account for purposes of promotion has had little impact[49]. Although in theory the promotion system can reward outstanding performance in any field, in practice it does not sufficiently recognise a commitment to learning and development by applying new skills, delivering training or moving jobs. In the audit survey only 17 % of respondents agreed that the commitment of staff to learning was recognised through the marks given to staff in the appraisal reports. Only 6 % of respondents agreed that the commitment of staff to learning was recognised through the speed of their promotions.

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[46] In the appraisal and promotion system in use until 2011, staff allocated to performance level IV were classified as underperformers.

[47] The new appraisal system from 2012 aims to ensure that staff performing below average are not promoted. Promotion points are not cumulative in the new system and promotion is no longer awarded on passing a threshold of points.

[48] The level of staff dissatisfaction with the appraisal and promotion system is indicated by the number of appeals against the promotion points. In 2010 there were some 3 400 appeals representing 16 % of 21 700 reports.

[49] Article 24a of the Staff Regulations states: “The Communities shall facilitate such further training and instruction for officials as is compatible with the proper functioning of the service and is in accordance with its own interests. Such training and instruction shall be taken into account for purposes of promotion in their careers.” Furthermore, the common appraisal standards require a willingness to develop new knowledge and skills through training to be taken into account as an aspect of conduct.

The Commission rarely evaluates the effectiveness of development actions, though it does measure staff satisfaction with them

43. Reliable information on the effectiveness of development actions is necessary in order to demonstrate their contribution to organisational objectives and to inform decisions on where to target learning and development resources. The audit therefore examined whether the Commission evaluated effectiveness at the four levels identified by the Kirkpatrick methodology[50] shown in ***Figure 11***.

Figure 11 –Kirkpatrick's four levels of evaluating learning

[50] Donald Kirkpatrick first proposed his theory of evaluation in 1959. More recently see Donald Kirkpatrick and James Kirkpatrick, Evaluating Training Programmes – The Four Levels, 2006. The four-level model is widely used across training communities. The Court chose the Kirkpatrick model to structure the assessment.

Evaluations measure staff satisfaction with development actions

44. The Commission sends feedback questionnaires to course participants immediately following a training course. The response rate is in the order of 80 %. The replies for 2010 show that 78 % of staff are satisfied with general training, 76 % with IT training and 85 % with language training[51]. Course managers and contractors receive a summary of feedback results via SYSLOG. They may also receive direct feedback from participants or trainers. Course managers can then address the criticisms, for example, by changing the course content or the trainer. For language courses there is a specific procedure for dealing with complaints agreed between the Commission and the contractor.

45. The Commission evaluates staff satisfaction with job moves by means of the Staff Opinion Survey carried out every two years. The 2010 survey found that only 34 % of staff were satisfied with opportunities for mobility[52]. The evaluation of the involvement and motivation of older Commission staff highlighted the perceived difficulties of some staff over 50 in finding another post[53].

46. In addition, there are more general indicators of overall staff satisfaction to which training and job moves contribute. For example, replies to staff satisfaction surveys, the level of staff turnover and the number of days' sickness absence. However, these indicators of staff satisfaction are influenced by many factors (e.g. job content, working conditions, management style and

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[51] The Staff Opinion Survey also measures staff satisfaction with training and found that 74 % of staff are satisfied with central courses and 71 % with local courses (2010 Staff Opinion Survey, p. 34).

[52] 2010 Staff Opinion Survey, p. 45.

[53] Evaluation of the Involvement and Motivation of Older Commission Staff (above 50 years), November 2008, Executive Summary, p. vii.

remuneration) and the contribution of staff development measures cannot be isolated.

The Commission does not analyse in detail why staff have not attended planned training and (except for language and certification training) generally does not test the acquisition of new skills

47. Training maps of individual staff members showed the expected contribution of training towards ensuring that the Commission has the skills it needs to meet its objectives. In order to know whether learning needs have been met, the Commission needs information on:

(a) whether staff attended courses planned in training maps;

(b) whether staff have successfully acquired new skills.

48. Staff did not attend 65 % of training courses planned in their training maps in 2010. This overstates the real level of non-fulfilment of training needs identified in training maps (see paragraph 30). However, the Commission has not analysed in detail the reasons for non-attendance in order to establish the real extent to which the needs identified in training maps have not been fulfilled.

49. Tests to measure the acquisition of knowledge and skills are mainly limited to language courses and the certification exercise (by which officials from the Assistant function group can become members of the Administrator function group). The pass rates in 2010 were 94 % for language courses and 65 % for the certification exercise. However, 23 % of participants in language courses dropped out. Consequently, only 72 % of those registered for the training successfully acquired the intended new knowledge (see ***Figure 7***). Other training does not generally test whether participants have acquired knowledge and skills although there have been inter-institutional discussions on evaluation which are considering introducing more tests to check knowledge acquired in IT

and general training. Also Development and Cooperation DG - EuropeAid has piloted pre- and post-testing in some e-learning courses[54].

There are limited attempts to evaluate the utility of development actions in the workplace

50. Perceptions of the impact of training in the workplace differ. DGs perceive that training organised locally is more focused on increasing efficiency and effectiveness at work whilst central courses focus on personal development and have less impact in the workplace. Conversely, Human Resources and Security DG perceives that some local training, for example group learning activities, has limited impact in the workplace.

51. The feedback questionnaires sent to participants immediately after the training course include a number of questions to assess whether participants will be able to apply the learning in the workplace[55]. In addition, there are some attempts to establish whether they have actually been able to apply the learning in practice. For example:

(a) The 2010 Staff Opinion Survey asked staff whether they could put the knowledge acquired from training into practice in their everyday work (70 % said they could)[56];

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[54] The e-learning application Blackboard has an option to oblige the participant to pass a test before being allowed access to the next element of the training module.

[55] The first statement which participants are asked to assess is “This course was relevant to my work”. There is a free text box asking “What help/support do you need to implement your learning in the workplace/on the job?” The question “How useful was this training action in terms of meeting your learning objectives?” could also reflect the usefulness of the course in the workplace.

[56] The 2008 Staff Opinion Survey asked staff to assess the utility in the workplace of different types of training and found 73 % for general training, 78 % for IT training and 76 % for language training.

(b) For the external management development programme, in addition to the evaluation directly after the course, there is a further evaluation 3 months later asking participants if and how they have applied their learning in the workplace;

(c) New staff attending the Welcome training during their first two days at work do not receive the general SYSLOG evaluation form. Instead they are sent a questionnaire some months after the training course which includes questions on whether the different presentations or training themes were useful;

(d) The project for improvement of evaluation forms proposes a series of questions to measure the impact of training 3 to 6 months after the course;

(e) For local courses Environment DG is moving the emphasis of evaluations towards a reflection of knowledge acquired and how it will be used (see ***Box 4***);

Box 4 – Environment DG initiatives to reflect on knowledge acquired and how it will be used

Environment DG has developed its own evaluation forms which focus on learning gained and how it will be used, rather than on participant satisfaction.

Participants in the influencing skills course are asked to discuss the course with their Head of Unit before attending.

At the end of Environment DG's strategic leadership course, participants are asked to make a presentation on one or more aspects of the course and to develop the ideas and how they would put them into practice. This encourages participants to reflect on how they will put their learning into practice.

Environment DG's initiative to help internal trainers gain confidence and skills to coach and teach internally similarly finishes with individual presentations by participants and personal feedback from the trainer.

To ensure participants are aware that they should learn something and put it into practice, all courses aim to include the following elements:

(a) a discussion between participants and their Head of Unit on the goals for the course;

(b) a session during the course on how to put the learning into practice;

(c)follow-up, which can be in different formats: a follow-up discussion with the Head of Unit; an Action Plan; a follow-up course; a presentation, as in the Strategic Leadership course.

Source: ECA on the basis of interviews with Environment DG.

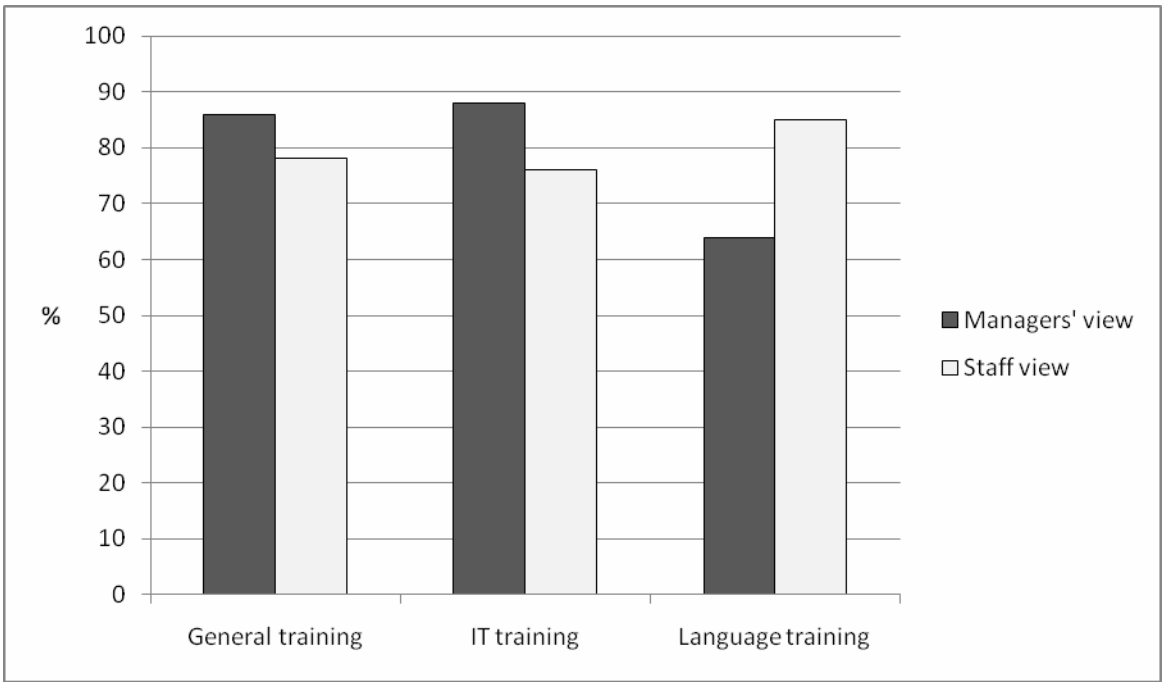
(f) For certification training the European Administrative School sends questionnaires to certified staff six to nine months after their appointment to an AD post, asking them how frequently they have used the skills learnt in the programme. 67 % say they frequently use the skills acquired and 74 % say that the training helped in their transition from Assistant to Administrator[57].

52. The attempts to measure the utility of learning in the workplace are mainly based on the opinions of participants. Although managers have an important role to play in ensuring that training corresponds to organisational needs (see paragraph 17) they are rarely asked for their opinion on the utility of training undertaken by their staff. The audit survey found that only 13 % of respondents were asked for their opinion on the effectiveness of training courses attended by their staff and only 10 % of respondents thought their views were taken into account.

[57] Annual Activity Report of the European Administrative School 2011.

53. However, the opinion of participants on the value of training is not a reliable substitute for the views of managers on its utility in the workplace. For example, ***Figure 12*** shows that 85 % of participants considered that language training met their objectives in 2010, whilst 64 % of managers replying to the audit survey considered that language training helped their staff to do their job better.

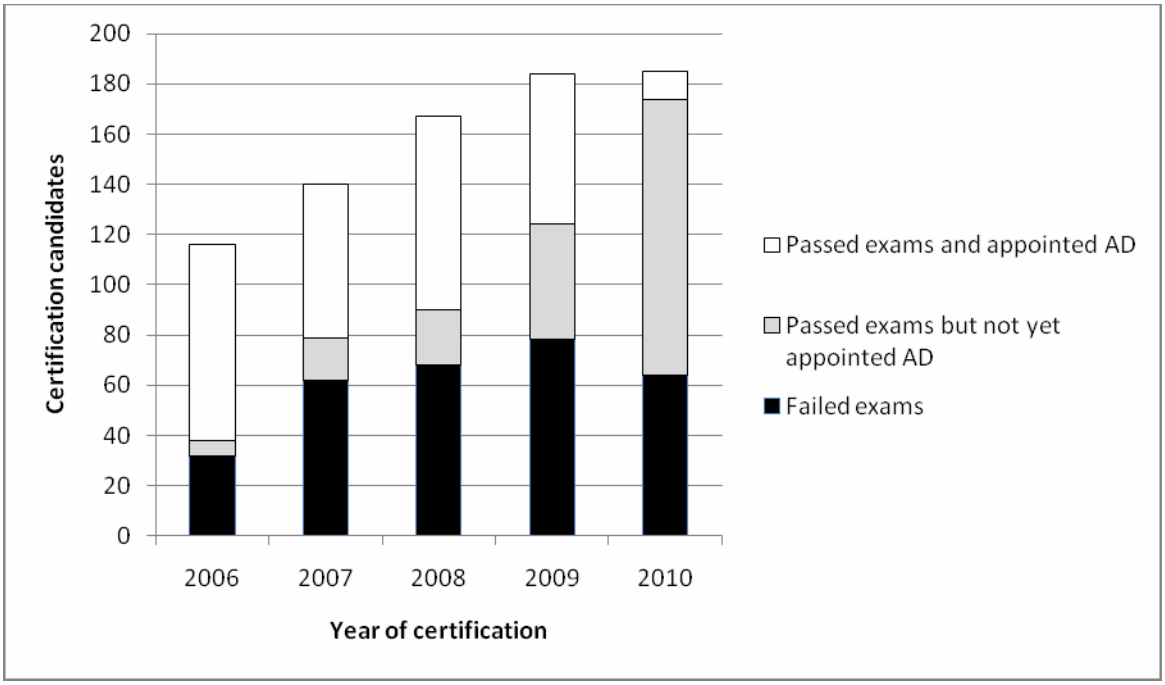
Figure 12 – Effectiveness perceived by managers and participants



Source: Human Resources and Security DG (staff view) and audit survey (managers' view).

54. Furthermore, evaluations of the effectiveness of learning actions rarely make reference to objective indicators. An example of the use of one such indicator is for certification training where the Commission monitors the number of candidates successfully passing the exams who are then appointed to Administrator (AD) posts. This indicates the utility of the training in the workplace (see ***Figure 13***).

Figure 13 – Success rates of certification candidates



Source: Human Resources and Security DG.

55. Other possible indicators could measure the Commission's use of follow-up actions to support staff in applying what they have learnt. Such follow-up actions could include post-course discussions with their manager, assessments by participants six months after the course and use of communities of practice, coaching and mentoring.

56. Also, the Commission has little information on the views of staff or managers, or from objective indicators, concerning the impact of job moves in the workplace. In order to measure the effectiveness of job moves in Communication DG, career guidance officers contact staff after rotation and 9 months later to question them about motivation and integration (see ***Box 1***).

57. In other DGs there were insufficient resources to carry out follow-up interviews to assess the effectiveness of job moves. Mobility aims to enable staff to develop skills in order to contribute to meeting organisational objectives. However, it can remove experienced staff and there is a risk that they are not replaced in a way which helps to achieve organisational goals. The audit

survey of middle managers found that only 33 % of respondents considered that the procedures for replacing staff were effective.

The Commission does not evaluate the impact of development actions on organisational results

58. The Commission does not evaluate the contribution of training and job moves to achieving organisational results. It therefore does not have the information necessary to identify and examine those cases where the investment in training has not resulted in improving performance or meeting objectives and to revisit its learning and development strategy accordingly. The Commission could identify indicators to measure the impact of various development actions, for example:

(a) the number of transactions processed without errors or the number of calls to the Helpdesk to measure the contribution of training on financial or IT procedures;

(b) the results achieved by an entity and the motivation of its staff to measure the impact of management training;

(c) changes in the quality of documents to measure the contribution of courses in administrative drafting;

(d) the quantity and quality of work of staff following job moves to measure the contribution of mobility.

CONCLUSIONS AND RECOMMENDATIONS

The Commission should closely align staff development with organisational needs

59. The Commission does not have sufficient consolidated information on staff skills to plan the development of its staff in line with the needs of the organisation. The annual appraisal in use until 2011 was not a reliable record of existing staff skills and did not reliably identify underperformance. Although it has been part of the Commission's human resource management information system since 2007, the e-CV is of limited use because it still lacks an effective search tool and Commission managers have access to the e-CVs of only 5 % of staff. The systems for identifying the resources needed to meet future challenges focus on staff numbers rather than on skills needed. The new staff appraisal system introduced in 2012 and the further development of the e-CV aim to improve the information available on staff skills (see paragraphs 8 to 13).

60. The top-down training strategy does not convincingly demonstrate how it will contribute to the achievement of the Commission's policy objectives. There is no strategy for developing staff through job moves although there are some initiatives which aim to better align mobility with organisational objectives (see paragraphs 14 to 16).

61. At an operational level, individual learning solutions were documented in training maps resulting from the annual dialogue between Heads of Unit and their staff. Generally, staff plan their own job moves in the context of an internal job market with insufficient information on staff skills and job vacancies. Some development actions, for example some language courses and job moves, do not address organisational needs (see paragraphs 17 to 21).

Recommendation 1

In order to align development actions more closely with the objectives of the organisation the Commission should:

(a) determine the core skills most relevant to the organisation and assess the performance of staff against them on recruitment and regularly throughout their career;

(b) identify skills necessary to meet future challenges based on a vision of what the organisation will look like in the medium term;

(c) prepare a multi-annual staff development strategy which convincingly demonstrates how training and mobility aim to contribute to achieving organisational goals by closing the gap between existing skills and those needed to meet current and future challenges.

Recommendation 2

In order to support this process the Commission should:

(a) ensure that all its staff complete their e-CV;

(b) make the e-CV a part of the annual discussion on learning and development needs between managers and their staff in order to keep it up to date;

(c) take the necessary steps to ensure managers have appropriate access to e-CVs;

(d) develop an effective search tool for the e-CV system;

(e) make full use of the e-CV, combined with publication of vacant posts, in order to improve the identification of suitable candidates;

(f) support staff in identifying training needs before matching these to specific training courses;

(g) approve training for staff, including language training, when it is aligned with the interests of the service;

(h) support staff in preparing longer term career development plans, taking into account the wider interest of the respective DGs, the Commission and the EU Institutions;

(i) support staff in moving jobs through a more visible career guidance function which provides advice to staff on opportunities for development and how to make the best use of their skills.

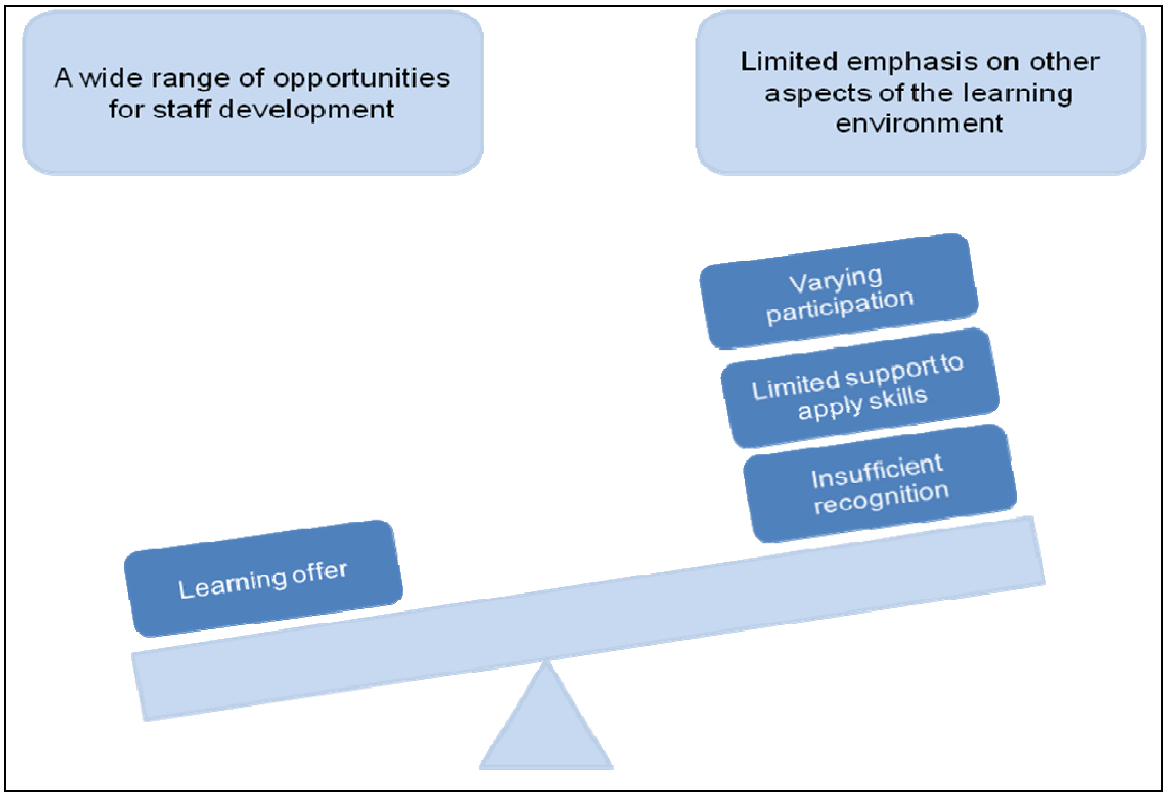
The Commission provides a wide range of opportunities for staff to develop

62. The Commission provides a wide range of opportunities for staff to develop through formal and informal learning and through moving jobs. In 2010 staff participated in an average of 6,9 days formal training. Informal learning is not recorded, but managers replying to the audit survey estimated that staff spent an average 4 days on informal learning. Each year 6 % of staff move to another DG and there are also considerable opportunities for staff to change jobs within the same DG (see paragraphs 22 to 28).

The Commission should strengthen its learning environment to capitalise on the learning offer

63. The Commission has not created a sufficiently strong learning environment to enable it to capitalise on the extensive learning offer. ***Figure 14*** illustrates how the wide range of opportunities for development is offset by varying levels of participation, limited support to apply new skills in the workplace and insufficient recognition of staff who develop their skills.

Figure 14 – The Commission has not created a sufficiently strong learning environment to capitalise on the learning offer



64. In 2010 staff attended only 35 % of the courses identified in their training maps. Although Commission staff participated in an average of 6,9 days' training in 2010, 30 % of staff participated in less than 2 days' training. Older and higher grade staff participate in less training than younger staff on lower grades. Moreover, there are high levels of absences and dropout rates from language courses. The Commission does not closely monitor whether staff participate in planned training courses and it no longer monitors the extent of mobility within DGs. The Commission's own managers and staff deliver some training, but not sufficient to indicate that staff development is valued enough by the organisation (see paragraphs 29 to 37).

65. The Commission generally provides limited support to apply new skills in the workplace (see paragraphs 38 and 39).

66. The promotion system in place until 2011 did not sufficiently distinguish between good performers who develop their skills and poor performers who do not. This lack of recognition contributes to the risk that staff are not motivated to participate in the wide range of development opportunities available. The new system introduced in 2012 aims to make a clearer distinction between good and poor performers and not to promote those whose performance is below average (see paragraphs 40 to 42).

Recommendation 3

The Commission should develop its systems in order to monitor more effectively:

(a) whether staff have attended the compulsory courses they should have;

(b) how many staff change jobs whilst remaining within the same DG.

Recommendation 4

The Commission should encourage all staff to participate in the wide range of development opportunities available by:

(a) giving more recognition through the appraisal and promotion system to the commitment of staff to developing their skills and those of others, for example by delivering training;

(b) addressing the issue of underperformance, including by providing as early as possible appropriate central support for line managers in addressing skills gaps of underperforming staff;

(c) using the annual discussion of training needs to encourage older staff on higher grades to keep their skills up to date and share their knowledge and experience with others.

Recommendation 5

The Commission should test and certify the acquisition of new skills where practicable and support their application in the workplace by providing follow-up activities.

The Commission should better evaluate the effectiveness of development actions

67. The Commission measures staff satisfaction with development actions, notably through feedback questionnaires sent to participants after a training course. In addition, the Commission obtains more general indications of staff satisfaction with training and job moves through the Staff Satisfaction Survey carried out every two years.

68. However, the Commission does not analyse why staff do not attend courses identified in their training maps and the real extent of unfulfilled needs. Nor

does it assess whether participants have acquired new skills (with the main exception of language training). The attempts to evaluate whether new skills are used in the workplace are based mainly on the opinions of participants. Managers are rarely asked for their opinion on the effectiveness of training courses attended by their staff or on the impact of job moves in the workplace. The Commission rarely has objective indicators to demonstrate the utility of development actions and their contribution to organisational results. Consequently the Commission lacks the information necessary to inform decisions on where to target learning and development resources (see paragraphs 43 to 58).

Recommendation 6

The Commission should better evaluate the effectiveness of development actions, including:

(a) objective indicators of progress towards achieving organisational goals resulting from development actions;

(b) an analysis of the extent of unfulfilled training needs;

(c) tests of the acquisition of new skills;

(d) measures of the use of follow- up actions to support staff in applying in the workplace what they have learnt;

(e) the analysis of managers on the effectiveness of development actions;

(f) opinions of staff on the utility of development actions in the workplace.

This Report was adopted by Chamber IV, headed by Mr Louis GALEA, Member of the Court of Auditors, in Luxembourg at its meeting of 22 May 2012.

For the Court of Auditors

Vítor Manuel da SILVA CALDEIRA
President

REPLIES OF THE COMMISSION TO THE SPECIAL REPORT OF THE EUROPEAN COURT OF AUDITORS

THE EFFECTIVENESS OF STAFF DEVELOPMENT IN THE EUROPEAN COMMISSION

EXECUTIVE SUMMARY

I. The Commission is conscious of the vital importance of its staff to enable it to fulfil its role effectively and recognises the importance of helping its staff to develop their competences throughout their careers. The Commission has taken several initiatives to improve management of its Human Capital in recent years. With the Administrative Reform launched in 2000 a partly decentralised human resources management was implemented, with some responsibilities notably in the area of staff development and careers delegated to the DGs. Currently the Commission is developing a new Job Information System and working on the inventory of competencies through a revision of the current eCV. Additionally, the appraisal and promotion systems were revised and have entered into force in 2012. The networks of HR units, of training coordinators and of career guidance officers are designed to ensure a consistent approach throughout the Commission and a sharing of HR best practices.

III. The Commission is working on the development of information systems on the skills of its staff and their development needs. The next release of eCV will help to make information on staff skills available to all managers. At central level the Commission concentrates on reinforcing the knowledge and competencies which are useful for staff across DGs. At DG level, the local training budget is used to cater for development needs in view of specific policy areas.

A multiannual Learning and Development strategy and a revised mobility policy are currently being prepared.

Development actions, including language courses, are a long-term investment in the effectiveness of the Commission's staff. The benefit cannot always be seen immediately in the current job.

V. Line managers assist their staff in the identification of individual training needs and the implementation of the skills acquired at the workplace. Staff who perform well are given recognition and promotion.

V. (a) The Commission has decided to abandon training maps as of 2012 because it had become too much of a bureaucratic exercise, rather than a real needs analysis. The Commission has complete information about training courses actually applied for and followed. Line managers take the final decision on which courses can be followed and when, on the basis of the interest of the service.

V. (b) The average number of training days, combined with the average number of days of informal learning, meets the target set by the Commission in 2002 of 10 days per person (up from 2.5 days). It is clear that there is a lifecycle effect, with less experienced staff requiring more training than more experienced staff.

V. (c) It is inevitable that, in language courses which take place twice-weekly over four months, some lessons will be missed owing to missions, urgent priorities at work, sickness, and, occasionally, annual leave. Despite these absences, three-quarters of participants succeed in the end-of-course tests.

V. (d) The Commission considers that the use of internal trainers cannot provide an indication which value an organisation attaches to learning.

V. (e) The line manager should ensure that new skills are applied at the workplace. Most of such follow-up activities are informal and therefore difficult to quantify.

V. (f) The Commission confirms that the new system aims to make a clearer distinction between good and poor performers and not to promote those whose performance is unsatisfactory.

VI. It can be cost-effective and useful on some occasions to test knowledge gained and to ask staff and managers about the relevance of training courses. However, it is rarely possible to make a direct and causal link between a particular development action (e.g. a training course) and an organisational goal (e.g. reducing carbon emissions).

VII. The Commission agrees with the Court's recommendations.

OBSERVATIONS

10. The old competition system enabled to test the knowledge and various skills of the candidates. After recruitment, this knowledge and skills were reflected in the Job Information System (job descriptions), appraisal dialogues, training maps and the whole learning and development structure. Very recently, the EPSO competitions system evolved into a more competency based assessment of candidates and as a follow up to that, in order to make the HRM tools coherent, the Commission has recently introduced a new project on alignment of HR processes along a single framework of 8 core competencies (used in the EPSO competitions).

Beyond this, the currently developed e-CV and search tool will enable the Commission to have a better overview of existing competencies of staff.

11. (a) The potentially unhelpful influence of promotion upon appraisal is one of the reasons why the Commission has changed from a single fully integrated system combining appraisal and promotion, in favour of two distinct systems managing appraisal and promotion in a clearly separated way.

11. (b) The framework for identifying underperformance exists. The Court’s finding highlights that it is rarely used in practice.

12. Significant development and improvement of eCV and the eCV search tool are currently on the way. The new tools will be made available to managers and staff in the course of 2012. Once the tools are available, all staff will be asked to complete their eCV.

13. In order to help produce aggregated data on the skills available in the Commission and its DGs and the skills required for each job, the Commission is currently working on the improvement of the JIS and eCV modules.

Managers will be encouraged to publish vacancy notices and, as an additional, supporting option, to prospect the internal Commission job market and identify potentially suitable candidates by using the eCV search tool, which will be made available to them in 2012.

Job holders will be encouraged to fill in and keep up-to-date their eCVs as, in this way, they will increase their potential chances to be found by managers in the Commission internal job market.

In addition, the Commission has recently launched a Business Process Re-engineering exercise which will stimulate the integration of HR information systems and in particular the consolidation of data related to skills and competencies of recruited staff with JIS/e-CV

14. The different roles of centrally and locally delivered training should be underlined. Half of the training budget is decentralised to DGs, who are able to focus on the specific goals of their DG. The remaining half is managed centrally and concentrates on reinforcing knowledge and competencies which are relevant to the effectiveness of staff across DGs. The centralised training is therefore more general and less specific than decentralised training. It is not the role of centralised training to make a strong link with specific policy objectives.

The objectives of language training are, on the one hand, to facilitate internal communication

between staff of the Commission, and, on the other hand to facilitate communication between staff of the Commission and external stakeholders, including Member States and their citizens.

15-16. Jointly reply. The Commission has launched an internal reflection on the possible/recommended directions for improvement of Internal Mobility. The proposal suggests, among others, a greater focus on the interest of the Commission and its benefits when managing the careers of staff. The use of eCV to identify potential candidates should help to improve the effectiveness of the mobility process in getting the right person for each job.

18. Other questions in the audit survey get a more positive response from managers. For instance, the survey indicates that 81% of respondents think that the training in staff appraisal helped them to prepare the appraisal dialogues and 73% of respondents think that the training in staff appraisal helped them to conduct the appraisal dialogues.

19. (a) Not all language courses have to have a direct link to the current job of a staff member. In view of the statutory requirement in art. 45.2 of the Staff Regulations, the Commission needs to ensure that all staff that have not yet demonstrated sufficient knowledge of a third language can follow language courses in order to reach the required level. The third language requirement is supposed to enable officials to be more versatile and flexible in the course of their career.

19. (c) Training courses are validated by the hierarchy in view of the interest of the service.

20. See reply to paragraph 15.

21. The primary responsibility for managing their career rests with each staff member. Nevertheless, in the interest of the organisation, the Commission provides guidance, in order to help ensure that the needs of the organisation can be met throughout the career of each individual. Guidance is given primarily by line managers. Guidance is also available from central and local career guidance services. These functions are visible and information is readily available.

The Commission is reflecting on a more proactive, intervention of the Central and Local Career Guidance services and the local HR function in helping staff to manage their careers and in steering their mobility.

Box 1 – Career guidance in Communication DG

DG COMM's approach is also widely used in other DGs, Agencies and other EU institutions.

28. The right time to move depends on several factors. One element is the contribution staff are able to make to their current job, which generally declines after a certain number of years on the job. Equally important to the timing of a move is the availability of another job which suits the profile of the person. The ideal time spent on each job therefore varies from person to person and from job to job and often changes over the course of a career.

The objective is to manage mobility in order to have the right person, with the right competences, in the right place, at the right time. Mobility is already part of the Commission's culture and it is usually well accepted. However, it should be used more proactively in order to increase competencies and sustain performance over the entire career.

30. The Commission has decided to abandon training maps as of 2012 because it had become too much of a bureaucratic exercise, rather than a real needs analysis. Training maps were insufficiently flexible to take account of evolving staff needs and were therefore not useful as a means of quantifying real needs.

31. It is inevitable that, in language courses which take place twice-weekly over four months, some lessons will be missed owing to missions, urgent priorities at work, sickness, and, occasionally, annual leave. Despite these absences, three-quarters of participants succeed in the end-of-course tests.

It should be noted that 64% of middle managers agree that language training helped staff to do their job better. Furthermore, even when language training is not directly useful for the current job, it can bring a benefit to the Commission in the future. See reply to paragraph 19(a).

32. See reply to paragraph 31.

34. It is clear that there is a lifecycle effect, with less experienced staff requiring more training than more experienced staff.

36. The job moves are recorded for each Commission official, in the Commission database Sysper2. The Commission is working on ways to produce meaningful and consistent statistical measures of mobility, in particular of intra-DG mobility.

37. The Commission considers that the use of internal trainers cannot provide an indication which value an organisation attaches to learning. Furthermore, many forms of training and coaching are not formally recorded in Syslog and are therefore difficult to quantify. It should be noted that coaching can take place between colleagues as well as from managers.

Box 3 – Examples of follow-up activities to reinforce and apply learning

In addition to the points noted by the Court, participants in the external management development programme are systematically asked to share the knowledge acquired during the course with other managers, during lunchtime sessions.

40. (b) The new promotion system which entered into force in 2012 aims to ensure that staff whose performance is not satisfactory should not be promoted until their performance improves. DGs will have to propose staff for promotion and they have no incentive to propose poor performers.

41. The framework for identifying underperformance exists. Training on how to manage underperformance is available and is well appreciated. SCOP (the central career guidance service) is involved in dealing with underperformance, when HR units request support for it. In those cases, SCOP, the local career guidance officer, the direct manager and the staff member work together to identify steps to follow to reverse the downward tendency before formal incompetence is declared on the basis of Article 51. The Commission does not have any evidence that these measures are ineffective when applied.

42. The commitment of staff to develop their skills is reflected in their ability and the use of languages (two of the sections of the appraisal report) and in their achievements (covered by the efficiency section of the appraisal report) as well as in the learning section which was added for the 2012 appraisal exercise. The commitment of staff to develop the skills of others is reflected in the efficiency, ability (training skills), conduct (working with others) and responsibilities (management skills, including feedback and coaching) sections of the report. Promotion depends on the criteria fixed in the Staff Regulations, that is, reports, use of languages and level of responsibilities. Rapid promotion will generally be justified on the basis of outstanding performance, but the competencies and learning capacity of the staff concerned is a key contributor to performance.

The contribution of learning and development to performance is more explicitly recognised in the appraisal system used since 2012, in which a new "learning" section has been added, for comments by the job-holder and the reporting officer.

45. The improved JIS and eCV and search tools module aim at allowing better informed career development and mobility decisions both on the side of the job holders and the managers.

As far as older staff are concerned, it’s not their perception about their decreased opportunities for mobility that should be better addressed, but the overall talent, career and performance management of all staff to keep high-level performance and commitment throughout their potentially very long careers.

47. See reply paragraph 30.

48. In addition to changes in work priorities, other reasons for not attending training include urgent unforeseen needs to stay in the office or go on mission, and illness.

54. Making a direct and causal link between a particular development action (e.g. a training course) and an organisational goal (e.g. reducing carbon emissions) is problematic. It is rarely possible to isolate the impact of training in a reliable way, among the many factors that may have contributed to the result.

Research done by the CIPD (Chartered Institute of Personnel and Development), Europe's largest HR and development professional body, demonstrates that level 4 of the Kirkpatrick model is extremely rarely applied by organisations. It can be done when the objective is very precisely identified (e.g. improve customer satisfaction) and when learning is also the main channel to solve the problem. These conditions are certainly not met in the case of the general Learning and Development policy of the Commission.

57. See reply to paragraph 45.

58. See reply to paragraph 54.

CONCLUSIONS & RECOMMENDATIONS

59. The Commission is working on the development of information systems on the skills of its staff and their development needs. The next release of eCV will help to make information on staff skills available to all managers. At central level the Commission concentrates on reinforcing the knowledge and competencies which are useful for staff across many DGs. At DG level the local training budget is used to cater for development needs in view of specific policy areas.

60. A multiannual Learning and Development strategy and a revised mobility policy are currently being prepared.

61. Development actions, including language courses, are a long-term investment in the effectiveness of the Commission's staff. The benefit cannot always be seen immediately in the current job.

Recommendation 1

First paragraph: The Commission agrees with the Court's recommendation, which is being implemented.

(a) The core competency framework used during the selection process by EPSO is currently being included in the new appraisal exercise.

The next releases of the job descriptions and eCV modules are aligned with this framework. The training catalogue is also being restructured in line with the competency framework.

(b) The Commission will extend to the medium-term (5 years) its planning exercise carried out to define recruitment needs for the whole institution, in order to programme EPSO competitions.

(c) The Commission intends to prepare a coherent strategy for the future in the field of Learning and Development. Mobility policies for senior and middle management have already been in place for several years. Guidelines for external and internal mobility of staff are being developed. JIS and eCV will contribute in particular to greater efficiency in the internal job market.

Recommendation 2

First paragraph: The Commission agrees with the Court's recommendation.

(a) eCV and its search tool is currently being developed and improved by DG HR. Staff will be actively encouraged to fill in their eCV and keep it up to date. The benefits such as making the

individual profile visible in the internal job market and increasing the chances for staff mobility and networking will be explained.

(b) Staff and line managers will receive guidance on how to use the appraisal exercise as an opportunity to review and update the eCV.

(c) The search tool will be developed and will be launched together with the revised eCV module within a year. Access will be given to managers and they will be explained how to use this tool and what benefits it can bring (increased overview of staff skills, a chance for an improved functioning of the internal job market, easier and more effective way to find the specific competencies required for specific teams or task forces).

(d) See (c).

(e) The introduction of the new eCV module will enhance the identification of suitable candidates and develop the means to support internal mobility. In line with the provisions of the Staff Regulations, the Commission will provide the DGs with guidelines for transparent, effective and efficient use of the new eCV module.

(f) The Commission agrees with the proposal made to better support staff in the identification of training needs. A section of the appraisal report is dedicated to the identification of staff's learning needs. Management is encouraged to reinforce the dialogue with staff on learning.

(g) Training in general and language training in particular is an investment, which is not necessarily related to a current job, but may be related to future career development, development and evolution of Commission organisational needs and, generally, should be seen in a long term perspective. The Commission will provide guidance to management on how to define the interest of the service of a learning activity, including in language training.

(h) Staff should be supported in their career development in ways which benefit both staff and the Commission.

To respond to the Court's recommendation, the Commission will include in its appraisal process a discussion on mid / long term career prospects with the line manager.

(i) The Commission will further analyse the way in which career guidance operates and will consider the evolution of this function in a context of shrinking resources. The Commission will consider strengthening the profile of the staff who are responsible for career guidance.

63. Support to apply new skills in the workplace is difficult to measure, because it is by nature informal.

64. The Commission has decided to abandon training maps as of 2012 because it had become too much of a bureaucratic exercise, rather than a real needs analysis. It is clear that there is a lifecycle effect, with less experienced staff requiring more training than more experienced staff.

It is inevitable that, in language courses which take place twice-weekly over four months, some lessons will be missed owing to missions, urgent priorities at work, sickness, and, occasionally, annual leave. Despite these absences, three-quarters of participants succeed in the end-of-course tests.

The Commission considers that the use of internal trainers cannot provide an indication which value an organisation attaches to learning.

The job moves are recorded for each Commission official, in the Commission database Sysper2.

65. It is the role of the line manager to ensure that the new skills are applied at the work place. Moreover, most follow-up activities are informal and therefore difficult to quantify.

66. The Commission confirms that the new system aims to make a clearer distinction between good and poor performers and not to promote those whose performance is unsatisfactory.

Recommendation 3

First paragraph: The Commission agrees with this recommendation. The personnel management system (Sysper2) is designed to manage information on individuals, while the Commission needs also aggregated data. The Commission will make a cost/benefit assessment of the development of a system responding to the Court's recommendation and define its implementation priority amongst other IT development projects planned.

(a) All staff and managers already have access to a training passport via Sysper 2, which gives this information for individuals. The Commission agrees that it needs also to have aggregated data sorted by category of staff and functions.

(b) This information is recorded at individual level. The job moves are recorded for each Commission official in the Commission database Sysper2. The Commission is working on ways to produce meaningful and consistent statistical measures of mobility, in particular of intra-DG mobility.

Recommendation 4

First paragraph: The Commission agrees with the principle of this recommendation, which is reflected in the new appraisal system.

(a) The Commission will assess how the commitment of staff to develop their skills and to deliver training has been taken into account in the appraisal and promotion exercises of 2012. Depending on the result of this assessment, the Commission will issue clearer guidance to management if needed.

(b) The Commission agrees that line managers need to take an active role in tackling underperformance and will continue to support them in this.

Moreover, the procedures on incompetence required by article 51.1 of the Staff Regulations need to be revised. The Commission will launch consultations in order to adopt new procedures.

(c) The Commission will take stock of the appraisal exercise of 2012 regarding these issues. It might provide clearer guidelines to managers if need be. It will also address the issue of training needs for older staff on higher grades in the multiannual Learning and Development strategy.

Recommendation 5

First paragraph: The Commission agrees with the Court's recommendation. Validation of new skills is highly desirable in general. The Learning and Development strategy will clarify which training paths may be appropriate for this, how acquisition of new skills should be tested and when it may be cost-effective to do so. The multiannual Learning and Development strategy will also cover the issue of follow-up activities.

68. It can be cost-effective and useful on some occasions to test knowledge gained and to ask staff and managers about the relevance of training courses. However, it is rarely possible to make a direct and causal link between a particular development action (e.g. a training course) and an organisational goal (e.g. reducing carbon emissions).

Recommendation 6

First paragraph: The Commission agrees on the need to evaluate the effectiveness of development actions. In order to better evaluate the effectiveness of development actions, the Commission will include in the multiannual Learning and Development strategy the points highlighted by the Court.