

The reality of the implementation of Bank of Algeria regulation No. 11-08, related to the internal control, Popular Credit of Algeria: a Case Study.

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Abstract:

In an attempt to avoid the repercussions of the recent global financial crisis, Algerian authorities has revamped some laws and regulations governing the banking system as a whole and an internal control in particular, by issuing in 2011 the regulation n°08/11, which canceled its predecessor.

Through this study, we tried to shed light on the extent of the Popular Credit of Algeria, to the requirements, by evaluating the measures taken, the structures put in place, where we concluded that was a weakness and slowing down of its application, not putting in place all the required components, plus the merger of some of them.

Keywords: Internal control, bank of Algeria, Banking system, regulation n° 11- 08.

Jel Classification Codes :G21

1. INTRODUCTION

The profitability of a country's banking system is a necessary condition for the economic growth (Caudamine, 1998). To ensure this profitability, there must be an efficient and effective banking system meeting the new requirements and contributing to the improvement of the business environment. This is the goal of the Algerian public authority represented by the Bank of Algeria. The latter's mission is « to ensure price stability as an aim of monetary policy, to create and maintain, in the domain of currency, credit and foreign exchange, the most favorable conditions to sustained economic development, while ensuring monetary and financial stability » (ordonnance 03-11, 2003, p. 10).

The Bank of Algeria ensures good standards and ratios applicable to banks and financial institutions, as well, especially in terms of coverage and risk spreading, solvency and risk liquidity in general (ordonnance 03/11, 2003, p. 13). Shedding light on the regulations issued in this field, we find for example the regulation n° 03/02 of November 14, 2002 on internal control of banks and financial institutions, to define the content of internal control that they must implement. Due to the role of internal control in risk management, is a security system for the bank's assets; and in this sense comes Basel II, to strengthen the rules of banking supervision. Reinforcement of the rules of surveillance and internal control.

After, the Algerian authorities implemented the regulation n° 11-08 of November 28, 2011 relating to the internal control of banks and financial institutions in order to make Algerian banks and financial institutions aware of the need to put in place an effective internal control, which will allow it to align with international standards and guard against all kinds of risks they face (Regulation n° 02/03, 2003).

The aim of our research is to verify and analyze the application of this regulation at the level of one of Algerian commercial banks, from which we were able to obtain her data. To reach our aim, we pose the following problematic :

What was brought it the regulation of the Bank of Algeria No. 08/11 relating to internal banking control? and what are the procedures taken by Popular Credit of Algeria (PCA) to implement this regulation?

The present paper is divided into three parts. The first and the second part discuss the internal banking control system and its various regulations on national and international. The last part presents a case study, where we will try to understand the practical aspects of internal control according to the regulation n° 11-08 of November 28, 2011 at the level of the Algerian popular credit bank "CPA", and determine the different structural changes made by this bank in order to implement the procedures of this regulation.

2. Internal banking control system

Over the past 80 years, the evolution of credit institutions, increasing difficulties, and failures for some, support the importance of internal control in banks (Gregory, 2003). The principal objective of internal control is to control the risks and the results, which banks face.

2.1 Definition of internal control

There are many definitions of internal control. Here we present the most relevant:

- Internal control is designated by all of the control structures and processes which, at all levels of the establishment, constitute the basis of its proper functioning and the achievement of the aims of commercial policy (Commission fédérale des banques, s.d.).
- Internal control is generally defined as an effective internal control system, which is an essential component of the management of an establishment and forms the basis for the safe and prudent operation of a banking organization. By having rigorous internal controls, the bank will be able to better achieve its long-term profitability goals and objectives, by also ensuring the reliability of its financial communication, both external and to its management (BRI, 1998, p. 7).
- Generally and in large scale, internal control concerns all the measures, which must ensure with certainty: orderly and prudent business conduct - knowledge and control of risks – in compliance with internal laws, regulations and procedures (G.vallin, 1994).

2.2 Aims of internal control

As defined by the BALE committee, internal control is a process implemented by the board of directors, general management and all levels of staff. It is not just a procedure or policy applied at a given time, but rather a system that works continuously at all levels of the bank. The board of directors and general management are responsible for establishing the appropriate culture capable of fostering an effective internal control process and continuously monitor its effectiveness; however, it is important that everyone actively participate. The main aims of the internal control process can be classified into three sections (BRI, 1998, p. 9).

- **Performance objectives** linked to the effectiveness and efficiency of the bank in the use of its assets and other resources as well as in protecting the establishment from losses.
- **Information objectives** relate to the preparation of relevant reports, reliable and as recent as possible, essential for making decision in the banking organization.
- **Compliance objectives** guarantee that all banking activity complies with laws, applicable prudential regulations and requirements as well as organizational policies and procedures. This objective must be met to preserve the rights and reputation of the bank.

The internal control system includes dispositions to ensure:

- the verification of internal operations and procedures, measurement, control and monitoring of risks;
- the reliability of the conditions for collecting, processing, distributing and storing accounting and financial data; and
- the effectiveness of the internal circulation channels for documentation and information as well as their dissemination to third parties (Michel, 2018).

2.3 The components of internal control:

Following the BALE committee, internal control consists of five elements closely related whose well-functioning is essential for the achievement of the objectives of the establishments, in terms of operational efficiency, the reliability of information and compliance with laws and

regulations:

- **Administrative control and control culture:** establishments must have an infrastructure, a clearly established organization and policy on internal control.
- **Recognition and Risk Assessment:** The risk assessment must make it possible to detect and assess internal and external factors may compromise the achievement of the establishment's objectives.
- **Control activities and separation of tasks:** is to consider as an element directly integrated into the operational management of establishments.
- **Information and communication:** Adequate information and effective communication are therefore two essential elements for the proper functioning of an internal control system.
- **Monitoring activities and correcting deficiencies:** Banking activity is a dynamic sector where techniques and products evolve rapidly. Monitoring the overall effectiveness of internal controls is based on a triple process (Bulletin de la commission bancaire, 1998).

3. Algerian internal banking control system and its various regulations:

In the context of the global financial crisis which began in 2007-2008 and whose consequences are still felt to this day, and like the rest of the countries, Algeria ensures an efficient banking system by improving the efficiency of the internal control system in banks; In Algeria, the banking system has experienced a wave of reform: deregulation, bankruptcy of banks; those latter and in particular the public banks face difficulties in preserving their solvency, to ensure their continuity and to bring confidence to the market, are examples among others which explain the need for the strengthening of internal control procedures in banks.

3.1 Regulation n° 03/2002:

To take all legal provisions into charge, especially those of effective banking supervision, initiated by the Basel committee, the currency and credit council of the Bank of Algeria have set up a complete regulatory system by instituting in 2002 the regulation n° 03/02 of 14/11/2002 on internal control, that banks and institutions must apply, knowing that these regulations are one of the determining factors for the transition to Basel 2, even a prerequisite (2019، بوطورة، سمايلي).

The internal control that banks and financial institutions must put in place includes in particular (Art 03 règlement BA n°02/03, 2003):

- a system for controlling internal operations and procedures;
- an accounting and information processing organization;
- risk and result measurement systems;
- risk monitoring and control systems;
- a documentation and information system.

3.2 Regulation n ° 08/2011:

The new regulations of the Bank of Algeria relating to redesigning and enrichment of the internal control system for banks and financial institutions have officially put into effect. Published in the official journal of August 29, 2012, this regulation, which abrogates and replaces

the regulation 02-03 of November 14, 2002, intends to make Algerian banks and financial institutions aware of the need to set up effective internal control, which will allow them to align with international standards and to guard against all kinds of risks, which they face (Rég BA n°11/08, 2001).

For this purpose the new regulation n° 11-08 of November 28, 2011, defines, overall, internal control and specifies (that consists of all processes, methods and measures aimed in particular at ensuring permanently: mastery of activities, the suitable functioning of internal processes, appropriate consideration of all risks, including operational risks, the respect of the internal procedures, etc.)

It evokes the Business Continuity Plan (BCP) and defines it as the set of measures aimed at ensuring, according to different crisis scenarios, the maintaining, if necessary, in a degraded mode, essential or important tasks of the bank or financial institution, then the planned resumption of activities.

This regulation also mentions other amendments, which appear in the content of six pillars of the internal control system, namely:

3.2.1 Pillar n°1: Internal operations and procedures control system

It is based in particular on two components of internal control, namely: the permanent control and periodic control. These two devices must apply to all banks or the financial institution and be integrated into the organization, the methods and procedures of each of these activities and locations. It is also about controlling the risk of non-compliance and the mechanism for preventing and combating money laundering and the financing of terrorism (CML-FT).

- **The permanent control:** to compliance, security and validation of operations realised it, as well as compliance with all guidelines, instructions, internal procedures and due diligence adopted by the bank or financial institution, those latter must ensure this control with a ensemble of means including: agents at the central and local services exclusively dedicated to this function as well as other agents pursue out operational activities;
- **The periodic control:** regularity and security of operations, the respect of internal procedures, the effectiveness of permanent control, the level of risk actually incurred, the effectiveness and appropriateness of risk management systems of all kinds to apply this control. Banks must designate a coordinator responsible for periodic controls and another responsible for permanent control who reports on their activities to the executive board and deliberate at his request and also ensures strict independence between the units responsible for operating commitments and those responsible for their validation;
- **Managing the risk of non-compliance:** Banks and financial institutions are required to set up specific procedures for examining the conformity of transactions that are due and necessary for the well functioning of this control. Also, procedures to prevent conflicts of interest and to ensure the professional ethics of the staff and members of the executive and deliberative board must be put in place;
- **The mechanism for preventing, combating money laundering, and the financing of terrorism (CML-FT):** Banks and financial institutions must put in place organizations,

procedures and means enabling them to comply with the legal and regulatory provisions applicable to the prevention and combating of money laundering and the financing of terrorism.

3.2.2 Pillar n°2: Accounting organization and information processing

It is based on (Art n°31-36 Reg n°11/08, 2011) :

- The obligation to comply with the legislative and regulatory provisions relating to the financial accounting system (SCF), and in particular the regulations of the Currency and Credit Council and the instructions of the Bank of Algeria directed to the banks and financial institutions;
- For the information included in the accounts and financial statements, the organization put in place, must guarantee the existence of all procedures, called "audit trails";
- The accounting information that appears in the documents and periodic reports intended for the Bank of Algeria or the Banking Commission, also those necessary for the calculation of management standards, must be taken from the accounting and be able to be justified by original documents;
- Banks and financial institutions determine the level of Information Technology security deemed desirable in relation to the requirements of their business. They ensure that their information systems constantly incorporate this minimum level of security.

3.2.3 Pillar n°3: Risk and result measurement systems

The Central Bank has defined the principles that characterize the internal control system and the measures to be implemented by risk category; the new regulation emphasizes the need for risk mapping which identifies and assesses all the risks incurred due to both internal and external factors, set also requires banks and financial institutions to have a selection procedure and a credit risk measurement system; also, it addresses the following risk measurement systems (Art n° 37-53 Reg n° 11/08, 2011):

- **The credit risk measurement system:** This system must identify, quantify and aggregate the risks arising from all balance sheets and off balance sheet transactions, for which the bank or financial institution incurs a risk of counterparty default or a concentration risk.
- **The interbank risk measurement system:** It includes a set of limits, a system for registration and processing information making it possible, for each counterparty, to obtain a centralization of the loans granted and the loans contracted, and finally procedures for monitoring and controlling the limits fixed.
- **The liquidity measurement system:** This system is based in particular on the determination of a general policy for liquidity management and tolerance for liquidity risk, on forecasting, on the identification of funding sources, on a set of limits with a measurement system, monitoring and alert, inally on the development of crisis scenarios, regularly updated.
- **The settlement risk measurement system:** Banks and financial institutions must set up a system for measuring their exposure to settlement risk, more particularly in foreign exchange transactions. They must, in particular, ensure that they understand the different phases of the settlement process.

- **The measuring system of the risk of global interest rates:** Banks and financial institutions must, when the exposure is significant, put up an internal information system to understand their exposure to global interest rate risk, to monitor and plan for any necessary corrections.

3.2.4 Pillar n°4: Monitoring and risk management Systems

Risk monitoring and management systems concern credit, concentration, interbank, interest rate, exchange rate, liquidity and settlement risks, it allowed particular attention to the identification, measurement and management of operational risks ; Indeed, it encourages, via article 59, to acquire means adapted to the monitor of these risks. In this sense, banks and financial institutions are required to set up business continuity plans and test them periodically. They must also ensure the security of their information systems under the conditions provided for by the regulations (Art n°54-60 Reg n° 11/08, 2011).

3.2.5 Pillar 5: The documentation and archiving system

This includes the development of:

- Activity procedures manuals: These manuals should describe, minimum, registration procedures, information processing and restitution, the accounting schemes and the procedures for engagement operations;
- documentation defining the means for the well functioning of the internal control system (Art n° 61-62 Reg n° 11/08, 2011).

3.2.6 Pillar n° 6: Governance rules

Regulation 11-08 compared to the old regulation 02/03, makes considerable changes to the rules of good governance, notably through the following elements (Art n° 63-66 Reg n° 11/08, 2011):

- The responsibility for ensuring that the bank or establishment concerned complies with its obligations lies with the executive board and the deliberative board. These latter are required to assess the effectiveness of the internal control system and to take any corrective measures;
- The executive and deliberative bodies must ensure the promotion of rules of ethics and integrity, and establish a culture of control within the bank or financial institution, the executive board immediately informs the deliberative one of significant incidents identified by the internal control system, especially with regard to exceeding risk limits, or internal /external fraud;
- Banks and financial institutions are required to develop a report on the conditions under which internal control is applied at least once a year. Depending on the nature of the activities exercised, the report includes specific comments on the various risks involved;
- The reports established by the entities in charge of permanent and periodic controls are communicated to the executive body and at its request, to the deliberative body, and if not available to the audit committee.

4. The effective implementation of the internal control system in Popular Credit of Algeria (PCA):

This part focuses on banking practice and the measures taken by the public bank called "**Popular Credit of Algeria (PCA)**", regarding its adoption to the system regulation n° 08/11, and checks the procedures taken by them in this sense.

4.1 Presentation of the CréditPopulaire d'Algérie bank :

PCA was created by decree n° 66/366 of December 29, 1966. It was considered the second commercial bank established in Algeria after the independence, by nationalizing both commercial and industrial banks, (Algeria, Oran, Annaba, Constantine), as well as other foreign banks, the Bank of Egypt Algeria, the Banking Corporation of SMC, the French bank credit company (CFCB) and the mixed bank (MISR BINAM).

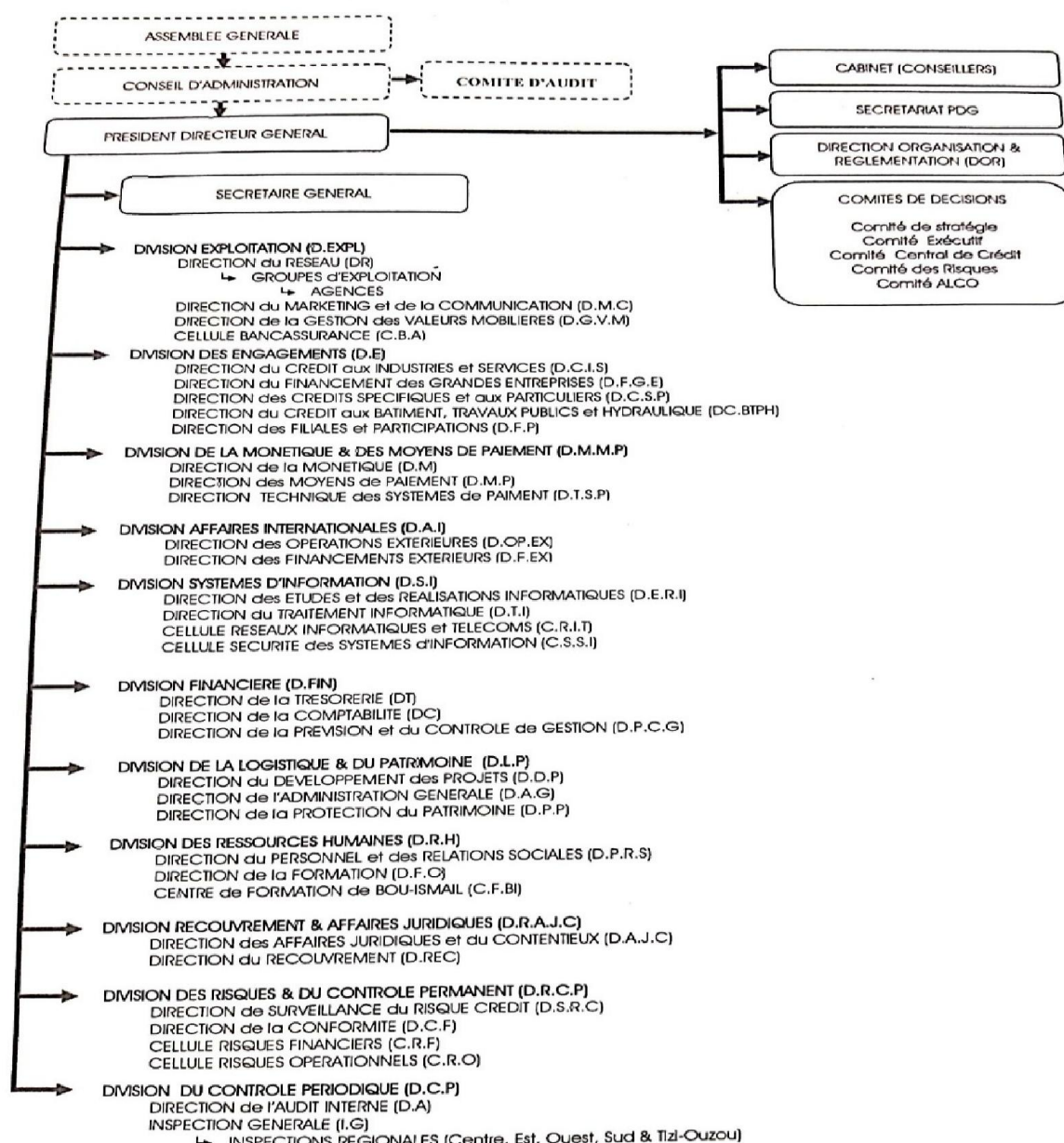
In accordance with the disposal of law n° 88-01 of January 1988 relating to the independence of public institutions, which stipulates which public companies are now governed by the commercial code, the bank has become a stock company with a social capital estimated at 800 million DZD, divided into 800 stocks, with a nominal value of 01 million DZD. The latter has experienced remarkable development in its share capital, reaching 48 billion DZD in 2010 (CPA web site, 2020).

4.2 The structure of the internal control system in the (PCA):

Following what was declared by the 08/11 regulation, in this part we will try to shed light on the changes linked to the internal control system that the bank adopts and which determine the different relationships between the involved parties, through an audit of the bank's general organizational structure and their missions and objectives.

4.2.1 Audit of Organization diagram:

Fig.1. Popular Credit Algerian Organization Diagram



Source: Website: <https://cpa-bank.dz/index.php/fr/la-banque/organisation>

This diagram shows the essential role of an audit committee in the operation of the bank's operations, it has a position linked hierarchically directly to the board of directors.

- It is also noticed from this diagram, the existence of four structures that relate to the Chief Executive Officer (CEO), they are:
- **Banking Risk Committee.**
- **Risk and Permanent Control Department (R .P.D),** including :
 - ✓ The banking risk control department ;
 - ✓ The compliance department.
- **Department of periodic control (D .C.P) :**regroups
 - ✓ the internal audit department (A.D) ;

- ✓ The general inspection (G.I).
- **Information system management (D.S.I) :**supervises
 - ✓ The Information Security Cell (I.S.C).

4.2.2 The procedures taken by the Popular Credit of Algeria, after the issuance of regulation n° 11/08:

By examining the various documents issued by the bank, we found the following:

4.2.2.1 Creation of an ethics committee:

After one year of the adoption of the regulation n° 11-08, the bank created an ethics committee, charged of ensuring the rules of good conduct and ethics in the bank. The Committee meets according to the frequency of deontology and ethics reports at least once per semester and as many times as necessary, its own mission is to:

- treat, assess and adjudicate on cases of deficiencies of the rules of professional conduct and ethics submitted to it;
- ensure the organization of sensitization and training sessions on the disposal of the code and its application procedures, to all of bank staff;
- validate the adjustments and updates to the bank's code of good conduct and ethics as well as the related implementation procedures.

4.2.2.2 Creation of a project direction responsible of implementing the recommendation on improving the internal control system:

Two years after the regulation 11/08, on 01/17/2013, the bank created this department, whose mission is to ensure the implementation of the recommendations received in order to improve the internal control system form the bank, according to the requirements of the new system.

This committee is composed of five internal members and three external members of the KPMG Algeria Foundation, which meet every 15 days, or whenever the need arises, to study or approve its work (Decision n° 07/13, 2013).

4.2.2.3 Creation of a risk and permanent control division:

On the proposal of the Inspector General, and in the perspective of providing the Bank with a body capable of taking charge of the implementation of the prescriptions decreed by the Bank of Algeria Regulation n° 11-08, covering the area of risk management and treat with permanent control, the bank created this division in 2014, and this regulation after 03 years.It includes the :

- ✓ Compliance Department and Operational Risks cell ;

Their mission isto:

- ✓ Define the risk assessment and monitoring systems as well as those relating to the Bank's permanent control and ensure their maintenance and updating according to changes in regulations, on the one hand, and business development and banking professions, on the other hand ;
- ✓ maintain and update the risk mapping and ensure, in accordance with prudential rules and standards, the overall monitoring of the risks to which the Bank may be exposed and ensure the proper functioning of the alert systems ;
- ✓ Design and keep up to date the monitoring reports sent to the executive and deliberative organ, the Audit Committee and the Risk Committee (from its creation) ;

- ✓ Exercise, on a regular and constant basis, the permanent controls required over all of the Bank's activities and businesses (Decision n°09/14, 2014).

4.2.2.4 Renewal of the banking strategy committee:

As mentioned in Decision No. 130/2016 renewing it, issued by the CEO of the CPA, this action falls under the new regulation 11/08 on internal control. And they meet, at least once a quarter in ordinary session and as many times as necessary in extraordinary session.

Its mission is to :

- ✓ Define the Bank's development strategy through the strategic plans drawn up periodically;
- ✓ Supervise and control the achievement of strategic objectives; and
- ✓ Following the market trends and trying to improve the bank's strategy accordingly (Decision n° 130/16, 2016).

4.2.2.5 Creation of the bank's risk committee:

After 06 years of the issuance of Regulation 11/08, the PCA has created and in accordance with the new regulation, a risk committee which meets once in a trimester and as many times as necessary, and measures and monitors the risks run by the bank (Decision n° 25/17, 2017).

4.2.2.6 Establish the Information Systems Division:

Following the new general organization chart of the bank and in the continuous context of development and modernization of its activities, the information systems division was created in 2018, after 07 years of the 11/08 regulation, its mission is to:

- ✓ design, manage and implement the bank's policy on information systems, ensuring their development, modernization, overall consistency and security;
- ✓ analyze and define the needs of the Bank in terms of information system (solutions, equipment, telecoms); and
- ✓ define and ensure compliance with norms and standards and their consistency in terms of Information System (projects, operation, security, contracts ...) and use of ICT (Decision n° 13/18, 2018).

4. CONCLUSION

After providing the previous details, it can be noticed that in accordance with the recommendations of the Basel committee, the bank of Algeria promulgated first the regulation n° 03/02 of November 14, 2002 relating to internal control that the banks and the financial establishment must implement it.

In November 2011 this regulation was repealed and replaced by regulation n° 08/11 which retained the same previous internal control components and with the development of another component, which is the rule of governance.

As for the reality of its application at the level of Algerian commercial banks, we studied the Popular Credit of Algeria, because it is the only bank on which we could obtain information about his internal control system and the circulars and regulatory texts that govern it. As a result, we have concluded the following:

- ✓ Slowdown in the implementation of the provisions of Regulation 08/11, where certain components were not developed until 2018, that is to say seven years after the system was launched ;

- ✓ The existence of an audit committee has a position directly linked to the board of directors as well as an internal audit department within the system for monitoring internal processes and procedures At the level of periodic monitoring, which can lead to overlapping of tasks and responsibilities and a lack of clarity in the way of working and the approved system;
- ✓ Overlap and lack of independence in tasks and responsibilities, where two components of the internal control system (risk control and permanent control) have merged in the same department;
- ✓ As part of the implementation of the disposal of Regulation 11/08, in particular its article 64 on governance, the bank is committed to this and has created an ethics department ;
- ✓ the bank has not created an archives and documentation service, as required by articles 61 and 62 of regulation 11-08;
- ✓ A unit has been created within the information system department, responsible for the security of the information system, as part of the implementation of the requirements of the internal control system ;
- ✓ The absence of a system for combating money laundering and the fight against terrorism ;
- ✓ Not being present at the bank level, and if looking at their general structure, a management control department, which concerned with measuring risks and results, stipulated in articles 37 to 53 of the 08/11 regulation ;
- ✓ The examiner of the general structure of the bank cannot see the existence of a clear internal control system at the level of the bank with all of its components and independent of the executive organ, but rather the presence of separate departments submitted and linked hierarchically to the CEO.

Recommendations:

- ✓ The bank must correct the deficiencies by introducing the components of internal control that have not yet been created; as (archive and documentation department ,system for combating money laundering and the fight against terrorism , management control department)
- ✓ The bank is obliged not to overlap in responsibilities and tasks, while paying attention and insisting on the principle of independence and governance.

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