UK and Europe Certified Translation

We are going to show you the different systems of UK and EU in terms of certified translation. Also, we will approach the new EU proposal of regulation for certified translation that tends to make the process easier for EU citizens.

MAIN DIFFERENCE: UK X EU

The UK, has a different type of law when it comes to translations. It consists in a common legal law system while the other countries of Europe are into a civil law system that has specific rules for each country. The differences between those two systems will be explained below.

COMMON LAW

A certified translation in UK is the translation of a document or certificate required for official use, translated by an accredited translation professional or by a company with an accredited translator who attests that the job is complete and accurate. In Common Law countries, there is not an official way of process regulating the status of a certified translator. The certified translator can be a professional having a diploma in England or Ireland. that must be a native speaker of the target language, having a deep knowledge of the language and have studied translation. This process of certification would involve a declaration of accuracy and a copy of the original document. The agency can also sign and seal / stamp the translation on behalf of the translator who carried out the translation.

CIVIL LAW

In the Civiel Law countries, such as France, Italy, Germany, Denmark, Greece and Spain, only official sworn translators or agencies working with these translators can certify translations. Each country has a different criteria for those who want to become a sworn translator. In most cases they have to pass an official national state exam, be registered at the national Ministry of Justice, or be registered at a Courts of Justice. You can recognize these professionals by their job titles. as an example, in France they are called Traducteur assermenté/traducteur expert judiciaire.

The certification is the Civil Law countries will take a longer time as the translator must stamp their documents.

RECENT FACTS - NEW REGULATION

We are talking about the announced EU Referendum in the UK. For the notarial and translation professions, the impact of Brexit may have great consequences. But a new EU regulation, which will affect many areas of notarial practice and translation, has been ignored – even though it will enter into force well before the UK leaves the EU. This regulation concerns the requirements for notarisation, legalisation and translation of personal documents.

PERSONAL DOCUMENTS

EU citizens that are moving to live or work in another part of the European Union will not have to prove the authenticity of their personal documents by means of an Apostille. Similarly, the Regulation will also avoid the need for certified or notarised translations of birth certificates, marriage certificates and death certificates for example.

REGULATION

In terms of Regulation, a public document is issued by the authorities of a Member State that establishes the following facts: birth, being alive, death, name, marriage, divorce, registered partnership, dissolution of a registered partnership, parenthood, adoption, domicile or residence, nationality, absence of a criminal record and the right to vote.

NOTARIZATION / TRANSLATION

Notaries and translators will be familiar with the above list of documents because they are often encountered in Spanish probate proceedings, marriages abroad and cross-border adoptions. There will probably be an impact on fee income earned from this type of work.

AFTER BREXIT!

The Regulation is set to start on the 20th day after its publication in the Official Journal of the European Union. It was signed into law on 6th July 2016, and its publication is just a formality. But, of course that things won't change overnight, the Member States have two years to implement the necessary steps for the issuance of multilingual certificates to avoid the need for translation of personal documents and the removal of legalisation requirements.

DUTCH TRANS

www.dutchtrans.co.uk/
info@dutchtrans.co.uk