

1
2 **Reference: Exploiting the employment potential of the personal and household services** ¹

3
4 Delivered electronically to
5 empl-household-services@ec.europa.eu

6
7 Postal:
8 European Commission
9 Directorate-General for Employment, Social Affairs & Inclusion
10 Discussion on Personal and household services
11 Unit C2
12 Rue Joseph II 2 - 1040 Brussels - Belgium

13
14
15 **Note of delivery**

16
17 First of all, a lot of thanks to the Commission of organising interesting consultation of exploiting the
18 employment potential of the personal and household services.

19
20 This opinion represents an opinion of an individual citizen, not any legal entity.

21
22 This opinion does not contain:

- 23 – any business secrets
24 – any trade secrets
25 – any confidential information.

26
27 This opinion is public and can be added to a relevant Commission web page.

28
29 Annex 1 holds information about my answers to the previous consultations – mostly organised by
30 the Commission.

31
32 Annex 2 holds information about disclaimers and copyright.

33
34
35 Best Regards,

36
37 Jukka Rannila
38 citizen of Finland

39
40
41 signed electronically

1 <http://ec.europa.eu/social/main.jsp?catId=333&langId=en&consultId=11&visib=0&furtherConsult=yes>
(Accessed 2 July 2012)

42

43 **SWD(2012) 95 final - COMMISSION STAFF WORKING DOCUMENT on exploiting the**
 44 **employment potential of the personal and household services**

45

46 **1. Previous consultations (Annex 1)**

47

48 Annex 1 holds information about my answers to the previous consultations – mostly organised by
 49 the Commission. In some cases I can reference to a specific consultation answer for a more
 50 thorough deliberation.

51

52 **2. General remarks to SWD(2012) 95 final**

53

54 In general personal and household services represent both real possibilities and real challenges.

55

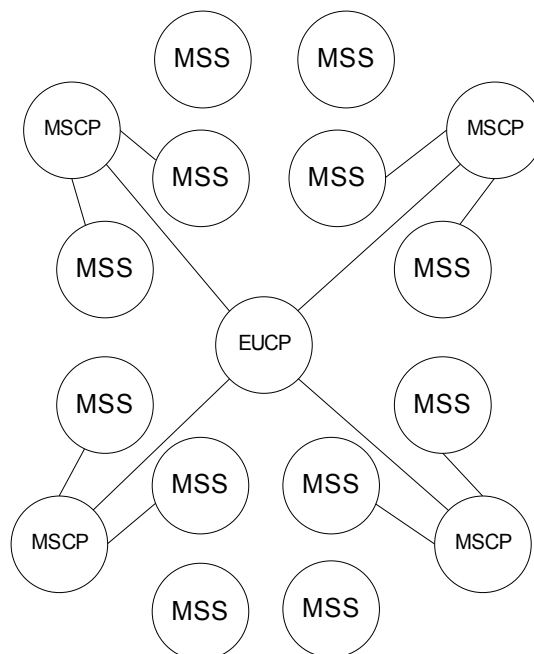
56 Like said (SWD(2012) 95 final), the main challenge is to move general personal and household
 57 services from the shadow economy to the formal economy. We need good ideas to make this shift to
 58 happen, but not with creating new administrative burdens to European Union citizens and to
 59 European Union enterprises.

60

61 **3. There are several member state systems in operation – both manual and electrical**

62

3



63

64

65 In my consultation opinion (Opinion 12, Public Consultation on European Interoperability Strategy)
 66 I present a figure with following three entities:

- 67 * MSS = Member State system
68 * MSCP = Member State Contact Point
69 * EUCP = European Contact Point
70

71 In practical reality there is a large collection of different manual and electronical information
72 systems, and in federal states there is one layer more, cf. Finland as a unitary state. It is safe to
73 assume, that there is a large collection of different manual and electronical information systems,
74 which handle information about general personal and household services.
75

76 Member State Systems (MSS) in this case can be following:

- 77 – Personal identification (number) Systems
78 – Company/enterprise (identification) (number) Systems
79 – Tax systems
80 – Statistics systems
81

82 Member State Contact Point (MSCP) Systems can collect information from several Member State
83 information (sub)systems, and that information can be aggregated and transmitted to the European
84 Contact Point (EUCP). For example different layers of Member States statistics is the prime
85 example of this aggregation and transmission, since European Union can provide a wide variety of
86 different statistics.
87

88 However, we should be cautious when creating new information systems, since they are very high-
89 risk endeavours and can require huge amounts of tax-payer money.
90

91 Rigorous re-use of different existing information systems and/or informations sets should be the
92 first option.

93 Minor or major modifications to different existing information systems should be the second option.
94 The last option should be totally new information systems.
95

96 **4. The myriad of language combinations: (official and semi-official) languages in the** 97 **European Union and languages outside of the European Union (official and semi-official)** 98

99 According to my initial analysis, we are dealing with very large sets of language combinations,
100 since general personal and household services can be provided by persons who are originally
101 outside of the European Union Member States (territories). Also we have to take account of the
102 some semi-official languages in the European Union Member States.
103

104 In practise general personal and household services provider and personal and household services
105 customer can mean very unpredictable language pairs; this is enforced when the customer is well-
106 versed just in one (semi)official language and the provider is just arrived as a migrant to a specific
107 Member State – possibly outside of the European Union.
108

109 In practical reality, there is a sizable Finnish-speaking community in Spain, e.g. there is an official
110 Finnish elementary ² school. Personally I have not visited this community, but I suppose, that

2 <http://www.suomalainenkoulu.net/> (Aurinkorannikon suomalainen koulu, Colegio Finlandés)

111 similar (small) pockets of different nationalities in a foreign country exist here and there in the
112 European Union.

113
114 What then? In practical reality general personal and household services provider and personal and
115 household services customer can be using non-official language of the country.

116
117 **5. Readability of European-Wide contract models / Open contests**

118
119 In the previous consultations I have proposed improving the quality of the different contract models
120 and different forms.

121
122 Answer 27: Public Consultation on the Modernisation of EU Public Procurement Policy
123 Answer 28: Consultation on the Europe 2020 Project Bond Initiative

124
125 In Finland Kela (The Social Insurance Institution of Finland) started their large-scale project to
126 create highly readable application forms for their customers. So, this example can be applied to the
127 European level – create highly readable and simple-to-use official documents for general personal
128 and household services.

129
130 I have also proposed some open contest to create most readable documents in the world. We should
131 not accept text created just by the lawyers, since juridically acceptable text can be said in many
132 ways.

133
134 **6. What this would mean in practical reality?**

135
136 The first step should be, that similarly to Finland, there is a large-scale improvement project to
137 streamline different forms related general personal and household services in order to make as
138 usable as possible.

139
140 The second step would be an European-Wide Contact Point, which collects all these different forms
141 together, i.e. forms related to general personal and household services.

142
143 The third step would be a translation service provided by this European-Wide Contact Point.

144
145 For example, in the case of a Spanish personal and household services forms there could be a
146 translation to Finnish and some non-EU foreign language. Or in Finland a Finnish personal and
147 household services form is Spanish and some non-EU foreign language, since a Spaniard can be
148 situated in Finland but the service provider is non-EU citizen speaking non-EU language.

149
150 Naturally, we can think that there would a large-scale bureaucracy with several dozens of jurist-
151 translators. That does not need to be the case, since there is several ³ freelance translations services,
152 which can take care of tiny or small-scale translations of non-EU languages and dialects of non-EU

3 ProZ.com (<http://www.proz.com/>), TranslatorsCafe (www.translatorscafe.com/), Aquarius (<http://aquarius.net/>),
GoTranslators (www.gotranslators.com/), Trally.com (www.trally.com/), BabelPort (www.babelport.com/),
Langmates.com (<http://langmates.com/>)

153 languages.

154

155 In our Finnish / Spanish example we can propose following:

156

157 Finnish form in Finland

158 → To Spanish (the customer)

159 To Non-EU language A (the provider)

160

161 Spanish form in Spain

162 → To Finnish (the customer)

163 → To Non-EU language B (the provider)

164

165 Naturally, there can be some odd situations, when there is some variations in the actual situation.

166

167 Swedish-speaking minority in Finland

168 → Finnish form to Swedish (the customer)

169 → To Non-EU language C (the provider)

170

171 Finnish Form in Finland

172 → Finnish form to Non-EU language D (the customer)

173 → Finnish form to Non-EU language E (the provider)

174

175 Etc. odd situations, since the world is a complex place.

176

177 In practical reality, there can be fluctuations for translations / language combinations in this
178 European-Wide Contact Point.

179

180 The remedy is, that those forms are originally streamlined as simple as possible, and using
181 creatively some of those b translations services (mentioned before) for translations of non-EU
182 languages, those tiny and small-scale translations can be created rather quickly by an average
183 translator.

184

185 Also, this European-Wide Contact Point can establish relations with relevant embassies around the
186 world, and the final proof-read of a certain translation can be accepted by a relevant embassy, if
187 there is need to have formal acceptance to some translations.

188

189 **7. A Member State Contact Point to handle paper-based forms**

190

191 If everything goes well, the provider of general personal and household services can understand the
192 needed official form even in non-EU language and the customer can understand the needed official
193 form even in non-EU language. Hopefully once-translated official forms spread to a specific
194 language community in a certain country.

195

196 In most basic form we can use paper-based forms, which can be used and signed. I would
197 recommend, that these forms based on foreign languages are handled in one Member State Contact

198 Point, e.g. in Finland some smaller Kela (The Social Insurance Institution of Finland) offices ease
199 the burden of of larger Kela offices.

200

201 **8. The usage of different information systems of Member States**

202

203 Similarly, the user interfaces of the different information systems ⁴ can be translated to several
204 different languages.

205

206 The practical reality is, that in many cases the user interface of an information system is hard-bolted
207 to a certain language, and therefore users with a foreign language need simple instructions to use
208 these user interfaces.

209

210 Once again, creating highly readable instructions for information system (complex interfaces) usage
211 means streamlined and clear written presentations, which are easy to translate to any given
212 language. Then the translation organised by the European-Wide Contact Point would not be too
213 hard for an average translator, also for non-EU language translators.

214

215 **9. Usage of different logos / Acceptance marks**

216



217

218

219 The EU Ecolabel ⁵ is a good example of an European-Wide logo / Acceptance mark.

220

221 May be there could be some logos / acceptance marks for these official forms to be used by the
222 providers of general personal and household services. This means using some administrative
223 imagination.

224

225 **10. Good luck !!!!!**

226

227 Hopefully this opinion gives some ideas for further work. I suppose, that there will be other
228 opinions / contributions, and the Commission can give a reasoned proposal for further actions.

4 <https://www.palkka.fi/>, an example of Finnish system to pay a salary as a house-hold, but only in Finnish and Swedish.

5 http://en.wikipedia.org/wiki/File:EU_Ecolabel_new_logo.jpg (Information about the license, accessed 2 July 2012)

229

ANNEX 1

230

231 My opinions to the previous and relevant consultations – there consultations were mostly organised
232 by the Commission of the European Union.

233

234 General page to all consultations – both in English and in Finnish:

235 <http://www.jukkarannila.fi/lausunnot.html>

236

237

238 EN: Opinion 1: Review of the rules on access to documents

239 http://www.jukkarannila.fi/lausunnot.html#nro_1

240

241 EN: Opinion 2: Schools for the 21st Century

242 http://www.jukkarannila.fi/lausunnot.html#nro_2

243

244 EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for
245 Safe and Innovative medicines

246 http://www.jukkarannila.fi/lausunnot.html#nro_3

247

248 EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders

249 http://www.jukkarannila.fi/lausunnot.html#nro_5

250

251 EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives

252 http://www.jukkarannila.fi/lausunnot.html#nro_6

253

254 EN: Opinion 8: European Interoperability Framework, version 2, draft

255 http://www.jukkarannila.fi/lausunnot.html#nro_8

256

257 EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS
258 proposal for comments

259 http://www.jukkarannila.fi/lausunnot.html#nro_9

260

261 EN: Opinion 15: Collective Redress

262 http://www.jukkarannila.fi/lausunnot.html#nro_15

263

264 EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530

265 http://www.jukkarannila.fi/lausunnot.html#nro_17

266

267 EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft

268 http://www.jukkarannila.fi/lausunnot.html#nro_18

269

270 EN: Opinion 19: Official Acknowledgement by the Commission

271 http://www.jukkarannila.fi/lausunnot.html#nro_19

272

273

- 274 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
275 http://www.jukkarannila.fi/lausunnot.html#nro_20
276
- 277 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
278 http://www.jukkarannila.fi/lausunnot.html#nro_21
279
- 280 EN: Opinion 23: Public consultation on the review of the European Standardisation System
281 http://www.jukkarannila.fi/lausunnot.html#nro_23
282
- 283 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
284 http://www.jukkarannila.fi/lausunnot.html#nro_27
285
- 286 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
287 http://www.jukkarannila.fi/lausunnot.html#nro_28
288
- 289 EN: Opinion 30: Internet Filtering
290 http://www.jukkarannila.fi/lausunnot.html#nro_30
- 291 NOTE: Organised by the European Committee for Standardization (CEN) ⁶
292
- 293 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
294 http://www.jukkarannila.fi/lausunnot.html#nro_32
295
- 296 EN: Opinion 34: REMIT Registration Format
297 http://www.jukkarannila.fi/lausunnot.html#nro_34
- 298 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁷
299

6 <http://www.cen.eu/> (Accessed 2 July 2012)

7 <http://www.acer.europa.eu/> (Accessed 2 July 2012)

ANNEX 2

300 301 DISCLAIMERS

302 303 Legal disclaimer:

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306 This opinion paper does not apply to any past, current or future legal entity. This opinion paper will not cover any of the
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313 entity making law proposals.

314 These opinions are not meant to be extreme-right, moderate-right, extreme-centre⁸, moderate-centre, extreme-left or
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317 worldwide politics.

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319 These opinions are not meant to rally for a candidacy in any public election in any level.

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340 The English explanation is in the following web page:

341 <http://creativecommons.org/licenses/by-nd-nc/1.0/fi/deed.en>

342



8 Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011 parliamentary elections in Finland challenge the three-party system, since three “old” parties were not traditionally as the three largest parties. The is now a “new” party as the third largest party. We all must remain being interested about this new development in Finland.