

**STUDY - GUIDELINES FOR TOURISM STAKEHOLDERS ABOUT LEGAL
REQUIREMENTS FOR PROVIDING ACCESSIBLE TOURISM SERVICES
AND FACILITIES**

*** Within the ALTER TRIP Project ***

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"Where in one place something is shortened,
God gives them twice as much in other places
- that is the balance of the Universe."

Risto Rechkoski

INTRODUCTION

Within the ALTER TRIP project, which is part of the initiatives related to motivating the transformation of a cross-border region between the Republic of North Macedonia and Greece into an accessible and inclusive tourist destination and supporting the sustainable development of heritage tourism in that area, one of the objectives and priorities are also the preparation of the Study - Guidelines for tourism stakeholders regarding the legal requirements for providing accessible tourism services and facilities.

This question is really a big challenge for anyone who deals with the study of tourism, legislation, and the research of these related phenomena in general, because it is really a very important issue in today's world, in the third decade of the 21st century, a period when the global environment is facing extremely difficult challenges, starting from the health aspect, which is followed by the global economic and energy crisis, lack of democracy in many parts of the planet Earth, to the great environmental problems and challenges facing all mankind.

In such constellations, in such turbulent times, to talk and think about the development of tourism is a really serious, but also a very responsible task. Tourism is a driver that drives the entire economy of the planet, on it and its development depends the overall development of certain regions, and the whole world, in some parts in a larger percentage, somewhere smaller, but the fact is that tourism is a global phenomenon, which contributes to the development of the entire world economy. That is why tourism, through its various forms and its various aspects, provides great opportunities that need to be nurtured and developed. Modern trends allow for its increased development, but on the other hand the limitations posed by global threats must be sought in a way that can be overcome, and those disadvantages turned into advantages. After all, this perennial pandemic with COVID 19 has shown that the world is very vulnerable, regardless of the size of the countries, regardless of the size of the economies, regardless of the funds invested in modern armaments, the world has proved very powerless to give a quick and effective joint response to such challenges. But, here in 2022, the unfolding and the end of that condition can already be seen, almost 3 years after its explosion. Such trends could not but be reflected in tourism. Reducing annual revenues from all industries, including tourism, have been particularly prevalent in these past 3 years of the pandemic.

That is why the world sees and seeks opportunities for amortization and reduction of the negative impact of the whole situation in all fields, and finding appropriate short-term and long-term solutions. At a certain period the whole world stopped, there were no movements, no trips, it was seen with all the indicators given by the tourism indicators in this period. The data are given in Table 1. In 2019¹ this number is 1.464 billion tourists, in 2020 - 399 million tourists, in 2021 - 415 million tourists; in Europe from 749 million tourists in 2019, that

¹ <https://www.statista.com/statistics/209334/total-number-of-international-tourist-arrivals/>

number will decrease to 235 million in 2020, and in 2021 there is a slight increase to 280 million tourists.

In the Republic of North Macedonia, although the numbers are enormously lower than the above mentioned, the trends are still the same. Thus in 2019² that number is 605,000 foreign tourists, and 365,615 domestic tourists, in 2020 there is a drastic reduction to 98,000 foreign and 282,839 domestic tourists, so that in 2021 there is a slight recovery and that number is 222,577 foreign tourists and 347,839 domestic tourists.

Table No. 1. Number of tourists in the respective regions in the period 2019-2021

	2019	2020	2021
Worldwide	1,464 million	399 million	415 million
Europe	749 million	235 million	280 million
Republic of North Macedonia	605,000+365,615= 970,615	98,000+282,839= 380,839	222,577+347,839= 570,416

Tourism must be developed, especially to adapt to new changes, and of course one of such alternative opportunities for its growth is the development of the so-called "Accessible tourism", which should be transformed into the so-called "Tourism for all".

People with disabilities are the wealth of any society because they have a lot more sense in certain things that other people do not have, and therefore every society should especially support them all, and give them special treatment, equating them with everyone else, and giving access to all, absolutely all services and facilities, because sooner or later everyone can belong to this category of people.

In relation to such persons, there are many interesting and indicative data arising from the corresponding most relevant world references. Thus, according to the data provided in the Inclusive Guide to Recovery - Socio-Cultural Impacts of Covid-19, number 1: People with disabilities³ issued by the World Tourism Organization, from 2020:

- 1 billion people live with some form of disability, which is 15% of the world's population.
- By 2050, 1 in 6 people, or 17%, will be over the age of 65, and 1 in 4 people, or 25% living in Europe and North America, will be 65 or older.
- More than 46% of the elderly, over 60, already have a disability.
- More than 250 million older people have moderate to severe disabilities.
- Passengers with disabilities tend to travel accompanied by 2 to 3 people.
- The potential market for people with disabilities in the EU is more than 80 million people, ie 130 million, if we add the elderly citizens and accompanying persons, which is really a great, huge potential for the development of tourism in general, and especially tourism for such people.
- 70% of people with disabilities in the EU have the financial and physical ability to travel, which is a huge potential, unlike other parts of the world.
- Unlike in Europe, the market size in Asia and the Pacific is 690 million people and in Latin America and the Caribbean this number reaches 85 million people.
- The economic impact of disability travel reaches \$ 58.7 billion in the United States.

² <https://tourismmacedonia.gov.mk/statistika/?lang=en>

³ <https://www.e-unwto.org/doi/book/10.18111/9789284422296>

- Travel by citizens of the United Kingdom with disabilities and their companions make up 15% of overnight stays in 2015 and 20% of daily visits in 2018.
- In Spain, the average cost of a holiday for tourists with a disability is over € 800 compared to € 600 for tourists without a disability.
- In Australia, when the domestic and inbound markets are added, the total accessible tourism market is worth AU \$ 10.8 billion.

The purpose of this Study, Guidelines for tourism stakeholders regarding the legal requirements for providing accessible tourist services, facilities and capacities is to present the relevant regulations for this area in the Republic of North Macedonia, to present the appropriate legal and by-laws framework, the provided architectural and technical norms and standards that apply when designing such facilities, and ensuring accessibility for all persons in them. Also, the objective is to show how close - and at the same time, how far - the Republic of North Macedonia is from the European and world standards in this area, because nothing new will be stated if it is emphasized that there are good legal regulations in the Republic of North Macedonia, but what is missing is the impossibility for its proper and timely implementation.

In order to reach their elaboration, first the overview of the most important acts at the global level will be given, which refer to persons with disabilities, through the UN acts, as well as the WTO, then at the regional level within the EU, and the Council of Europe, further the most relevant ISO standards for this issue, and finally, of course, the national regulations of the Republic of North Macedonia, and its most important features.

The target groups of this project, and especially of this Study, which will really benefit from the data from this Study, are:

- Managers of tourist facilities (hotels, restaurants, museums, cultural facilities, sports facilities, tourist sites);
- Travel agencies;
- Tour operators;
- National and local authorities responsible for tourism development and social protection of persons with disabilities;
- CSOs of persons with disabilities.

1. World Accessibility System within the UN and the UN Specialized Organizations

The most basic mechanism for the protection of all human rights and freedoms of citizens is contained in the only global organization to date, the United Nations, through its most important legal instruments, Conventions, Covenants, Declarations. Starting from the UN Charter⁴ of 16.06.1945, the Universal Declaration of Human and Citizen Rights⁵, adopted by the UN General Assembly on 10.12.1948, then the International Covenant on Civil and

⁴ <https://mk.freejournal.info/1252857/1/povelbi-na-obedinetite-natsii.html>

⁵ <https://www.healthrights.mk/pdf/Pravnici/Megjunarodni%20dokumenti%20i%20mehanizmi%20za%20zastita%20na%20covekovite%20prava/%D0%9EN/1%20-%20%D0%A3%D0%BD%D0%B8%D0%B2%D0%B5%D1%80%D0%B7%D0%B0%D0%BB%D0%BD%D0%B0%20%D0%B4%D0%B5%D0%BA%D0%BB%D0%B0%D1%80%D0%B0%D1%86%D0%B8%D1%98%D0%B0%20%20%D0%B7%D0%B0%20%D1%87%D0%BE%D0%B2%D0%B5%D0%BA%D0%BE%D0%B2%D0%B8%D1%82%D0%B5%20%D0%BF%D1%80%D0%B0%D0%B2%D0%B0.pdf>

Political Freedoms and Rights⁶ of 16.12.1966, International Covenant on Economic, Social and Cultural Rights of 16.12.1966⁷, all these documents, as fundamental to the existence of the UN, express the basic principle of life, namely the equality of all, as well as the prohibition of all forms of discrimination, as well as the rights of all regardless of any grounds to be able to enjoy the benefits life gives them.

The most significant step forward, as the crowning achievement of almost 80 years of UN activity in terms of equality and the rights of persons with disabilities, is the adoption of the Convention on the Rights of Persons with Disabilities and the Optional Protocol, adopted by the UN General Assembly on 13.12.2006.

1.1. Convention on the Rights of Persons with Disabilities

The Convention on the Rights of Persons with Disabilities and the Optional Protocol, adopted by the UN General Assembly on 13.12.2006, entered into force on 03.05.2008, ie the thirtieth day after the deposit of the twentieth instrument of ratification or accession. To date, it has been ratified or acceded by 172 signatory states and the EU as a signatory, which is one of the most implemented UN conventions. This Convention is the main document within the whole World, which refers to the rights of persons with disabilities.

The Convention was signed by the Republic of North Macedonia on March 30, 2007, and the Optional Protocol to the Convention was signed by the Republic of North Macedonia on July 29, 2009. Both acts were ratified on 14.12.2011 with the Law on Ratification of the Convention on the Rights of Persons with Disabilities and the Optional Protocol to the Convention on the Rights of Persons with Disabilities⁸.

The Convention contains a total of 50 articles, without the Protocol, and it provides in the most general way the framework, which should be a global framework, and a kind of world standard for respecting the rights of persons with disabilities. Much has been done, but much remains to be done in the future.

It refers to all the most important UN instruments in the Preamble, starting with the UN Charter, the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights, and the International Convention on the Elimination of All Forms of Racial Discrimination, the Convention on the Elimination of All Forms of Discrimination against Women, the Convention against Torture and Other Cruel, Inhumane or Degrading Treatment or Punishment, the Convention on the Rights of the Child, the International Convention on the Protection of the Rights of All Migrant Workers and members of their families.

The Convention on the Rights of Persons with Disabilities emphasizes the importance of integrating disability issues into regular processes as an integral part of relevant sustainable development strategies. It reaffirms the position that discrimination against any person on the basis of disability is a violation of the inherent dignity and worth of human beings, that promoting the full enjoyment of the human rights and fundamental freedoms of persons with disabilities and their full participation will contribute to their increased sense of affiliation, and for significant progress in the human, social and economic development of any society,

⁶ <http://bezomrazno.mk/wp-content/uploads/2013/10/Megjunaroden-pakt-za-gragjanski-i-politicki-prava.pdf>

⁷ <https://www.aktiv.mk/com-akeeba/resursi/dokumenti/pravila-i-zakoni/megjunarodni/218-megjunaroden-pakt-za-ekonomski-socijalni-i-kulturni-prava>

⁸ Official Gazette of Republic of Macedonia, No. 172/2011

as well as the eradication of poverty. The Convention applies globally, promoting the participation of persons with disabilities in the civil, political, economic, social and cultural spheres with equal opportunities, both in developing and developed countries.

The purpose of the Convention is to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms of all persons with disabilities, as well as to promote respect for their inherent dignity. People with disabilities are those people with long-term physical, mental, intellectual or sensory impairments, who in interaction with different barriers can hinder their full and effective participation in various social processes together with other people.

The Convention provides an appropriate explanation and context for the relevant concepts related to the rights of persons with disabilities, as follows: Communication; Language; Discrimination based on disability; Reasonable adjustment; as well as Universal Design.

The general principles of the Convention are:

- Respect for innate dignity, individual autonomy, including the freedom to make one's own choices, and the independence of individuals;
- Non-discrimination;
- Full and effective participation and inclusion in society;
- Respect for differences and acceptance of people with disabilities as part of human diversity and humanism;
- Equality of opportunity;
- **Accessibility;**
- Equality between men and women;
- Respect for the developmental abilities of children with disabilities and respect for the right of children with disabilities to preserve their identity.

The basic obligations of the signatory states are to provide and promote in full realization of all human rights and fundamental freedoms for all persons with disabilities without discrimination of any kind. They must adopt appropriate legal, administrative and other measures to enforce the rights recognized in the Convention. All appropriate measures should be taken, including legislation, to amend or repeal existing laws, regulations, customs and practices that discriminate against persons with disabilities from any natural or legal person, as well as a private or public entity; to take into account the protection and promotion of the human rights of persons with disabilities in all policies and programs; Undertake or promote research and development of universally designed products, services, equipment and facilities. All signatory States should undertake or promote research and development, and promote the availability and use of new technologies, including information and communication technologies, mobility aids, other aids and assistive technologies, appropriate to persons with disabilities, giving priority to affordable technologies. States must provide accessible information to persons with disabilities regarding mobility aids, other aids and assistive technologies, including new technologies, as well as other forms of assistance, support services and facilities. They should also promote training for professionals and staff working with people with disabilities, in order to better provide assistance and support services. For all these obligations there must be adequate and consistent international cooperation and assistance, in order to uniformly implement all the objectives of the Convention itself, and whenever it comes to the rights of these persons, in their implementation, states must include the persons themselves, whether individually or through their respective civil society organizations or various associations.

The following is Art. 5 which regulates Equality and Non-Discrimination, in the context that States Parties shall prohibit all discrimination on the basis of disability and shall guarantee persons with disabilities equal and effective legal protection against discrimination on all grounds.

In Article 6, States Parties recognize that women and girls with disabilities are subject to multiple discrimination, and in this regard will take measures to ensure their full and equal enjoyment of all human rights and fundamental freedoms.

Article 7 refers to children with disabilities and according to this Article, all necessary measures should be taken to ensure the full realization of all human rights and fundamental freedoms of children with disabilities on an equal basis with other children.

Raising awareness is particularly important, and there are provisions in Art. 8 of the Convention. Measures to this end must be taken at the level of society as a whole, including at the micro-level, by the family, in relation to persons with disabilities, and to promote respect for their rights and dignity. Effective campaigns should also be initiated and maintained to raise public awareness of the respect and promotion of positive perceptions and greater social awareness of those persons, as well as recognition of their skills, values, abilities and contributions to the labor market. Greater media coverage and awareness, as well as promotion of training programs to raise awareness of their rights.

One of the **basic principles** of the Convention is **Accessibility**, which is elaborated in Article 9. The purpose of the States Parties is to enable persons with disabilities to live independently and to participate fully in all aspects of life, and therefore appropriate measures should be taken to ensure that these persons have equal access to the physical environment on an equal basis with others, and that includes transport, information and communications, as well as access to information and communication technologies and systems, and other facilities and services open or provided to the public, both in urban and rural areas. Such measures include the identification and elimination of obstacles and barriers to accessibility in relation to: Facilities, roads, means of transport and other internal and external facilities, including schools, homes, medical facilities and workplaces; Information, communications and other services, including electronic services and emergency services.

The Convention requires all to take appropriate measures to develop, disseminate and monitor the implementation of minimum standards and guidelines for accessibility of facilities and services open or provided to the public; ensuring that private entities offering facilities and services that are open or provided to the public take into account all aspects of accessibility for persons with disabilities; providing training for shareholders on accessibility issues faced by persons with disabilities; providing Braille signs and signs in easily legible and intelligible forms in buildings and other facilities open to the public; providing forms of assistants and facilitators, including guides, readers, and professional sign language interpreters, to facilitate accessibility to facilities and other facilities open to the public; promoting the design, development, production and distribution, and access for persons with disabilities to new information and communication technologies and systems and their accessibility at minimum prices.

Art. 10 refers to the universal right to life for all. Art. 11 provides provisions for certain risk situations, armed conflict and other emergencies. According to the standards of international law, including international humanitarian law, and universal human rights, they will take all necessary measures to ensure the protection and safety of persons with disabilities in situations of risk, including situations of armed conflict, humanitarian emergencies and natural disasters.

Art. 12 speaks of Equal recognition before the law for all. All measures related to the exercise of the legal capacity of such persons should be provided, as well as appropriate and effective safeguards designed to prevent abuse in accordance with international law. Practicing legal capacity respects the rights, will and preferences of the person, that they are free from conflict of interest and inappropriate influence, are proportionate and made according to the conditions in which the person is, are applied in the shortest possible time and are subject to regular review by a competent, independent and impartial body or judicial body. All appropriate and effective measures should also be taken to ensure the equal right of persons with disabilities to own or inherit property ownership, to control their own financial affairs and to have equal access to bank loans, mortgages and other forms of financial lending.

Non-selective access to justice is regulated in Article 13, which states that States Parties shall provide effective access to justice for persons with disabilities on an equal basis with others through procedural and age-appropriate adjustments, in order to simplify their effective role as direct and indirect participants, including as witnesses, in legal proceedings, in investigative and other preliminary stages in various proceedings.

The freedom and security of persons, regulated in Article 14, is also one of the universal principles and rights of all. It should be ensured that persons with disabilities enjoy the right to liberty and security of person on an equal basis with all others. These persons may not be unlawfully or subjectively deprived of their liberty, and that any deprivation of their liberty shall be in accordance with the law, and the existence of a disability shall in no case be a justification for deprivation of liberty.

This is followed by the Freedom from torture or cruel, inhumane or degrading treatment or punishment, regulated in Article 15. No one must not and shall not be subjected to torture or to cruel, inhumane or degrading treatment or punishment. In particular, no one shall be subjected to medical or scientific experimentation without his or her free consent.

Art. 16 regulates the freedom from exploitation, violence and abuse, in terms of taking appropriate legal, administrative, social, educational and other measures to protect persons with disabilities, inside and outside the home, from all forms of exploitation, violence and abuse, including in terms of gender.

The protection of the physical and mental integrity of each person is provided in Article 17. Freedom of movement and nationality are regulated in Art. 18. The rights of persons with disabilities to freedom of movement, freedom to choose their place of residence and freedom of nationality are recognized on an equal basis with others. Those persons have the right to acquire or change their nationality, they must not be arbitrarily deprived of their nationality, as well as their ability to acquire, possess and use documentation of their nationality, or other identification documents based on disability.

The right to independent living and inclusion in the community of these persons is regulated in Article 19. People with disabilities have the opportunity to choose their place of residence, where and with whom they will live, on an equal basis with others and are not obliged to live in certain organized living conditions. They have access to a wide range of national, resident and other support services, including personal assistance necessary to support their daily lives and involvement in the process, as well as to prevent isolation or segregation from the community.

Art. 20 refers to Personal Mobility. The personal mobility of these persons should be ensured, with the greatest possible independence, through: Facilitation of personal mobility of their choice, in an appropriate manner, in a timely manner; Facilitate the access of these persons to quality mobility aids, other aids and assistive technologies, forms of live aid and

intermediaries, making them available at affordable prices; as well as Providing mobility skills training for people with disabilities themselves, as well as for the specialized staff working with them.

Freedom of expression and opinion, and access to information is regulated in the following Art. 21, and embraces their freedom to seek, receive and impart information and ideas on an equal basis with others, through all forms of communication. It refers to information intended for the general public, to be made available in accessible formats and technologies suitable for different types of disabilities, in a timely manner and at no additional cost, as well as Acceptance and facilitation of the use of sign language, Braille, augmentative and alternative communication, and all other accessible means, ways and formats of communication of choice for persons with disabilities. Encouraging all types of media to make their services accessible to people with disabilities, as well as recognizing and promoting the use of sign language.

Art. 22 and 23 refer to Respect for Home and Family, as well as the Privacy of Persons. No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honor and reputation. The privacy of personal information, health information and rehabilitation of such persons must be protected at the highest level. There must be no discrimination against persons with disabilities in all matters relating to marriage, family, parenting and family relationships, as well as to other persons. The equal right of all persons with disabilities who are of marriageable age to marry and to found a family is based on the recognition of the free and full consent of the prospective spouses. They are free and responsible for deciding on the number of their children and family planning.

The right to education is regulated in Art. 24 of the Convention and covers its realization without any discrimination and on the basis of equal opportunities, through inclusion in the education system at all levels and lifelong learning. People with disabilities have access to inclusive, quality, free primary and secondary education on an equal basis with others. Stimulates the facilitation of the study of the Braille alphabet, alternate letters, augmentative and alternative models, means and formats of communication, orientation and mobility skills, and facilitates peer support and mentoring; Facilitate the study of sign language and promote the linguistic identity of the hearing impaired community; Providing for the education of the blind, deaf, or deaf and blind, to be in the most appropriate languages and ways, and means of communication for the individual, through the appropriate specialized staff, teachers, who are trained for this type of education. Persons with disabilities must also have access to general higher education, vocational training, adult education and lifelong learning without any discrimination.

The following is the section on Health and habilitation and rehabilitation, in Art. 25 and 26. Persons with disabilities are entitled to the highest attainable standard of health without any discrimination. All appropriate measures must be taken to ensure that these persons have access to gender-sensitive health services, including health rehabilitation. The same scope, quality and standard of free or available health care and programs for people with disabilities must also be provided, as provided for other persons, including in the areas of sexual and reproductive health and public health programs. There must be a ban on any discrimination against persons with disabilities in the provision of health insurance and life insurance. Effective measures must be taken, including peer support, to enable persons with disabilities to achieve and maintain their maximum independence, full physical, mental, social and professional ability, and their full inclusion in all aspects of social life.

Regarding the work and employment of these persons, in Article 27, the right of persons with

disabilities to work is recognized on an equal basis with others. It is a right and opportunity for a dignified and equal income for livelihood with others, through their free choice of work, as well as a work environment that is open, inclusive and accessible to these people. Promoting the opportunity for entrepreneurship, self-employment, career advancement, their appropriate employment in the public sector, as well as in the private sector through appropriate programs and affirmative favors.

Art. 28 regulates the Adequate standard of living and social protection of these persons, through: Ensuring equal access to public services for clean water, and other public services, aids and other types of assistance with disability needs, Providing access, especially for women, girls and the elderly with disabilities, to social protection and poverty reduction programs; providing state housing programs; as well as equal access to pensions and retirement plans.

Their participation in public and political life is guaranteed. In Art. 29 it is said that these persons are provided with effective and full participation in political and public life on an equal basis with others, directly or through freely elected representatives, exercising their active and passive suffrage; Voting procedures, facilities and materials must be adequate, accessible and easy to understand and use, and when necessary, provide them with some assistance in exercising their voting rights. They are given the opportunity for their free participation in political parties, as well as in their civil society organizations and associations, at local, national and international level.

Participation in cultural life, recreation, leisure activities and sports is very important for the mental and physical health of all people, and of course for people with disabilities. Article 30 states that persons with disabilities participate in cultural life on an equal footing with all other persons. States must take all appropriate measures to ensure that these persons have access to cultural materials, television programs, films, theater and other cultural activities, in accessible formats. These persons must have access to cultural institutions, such as theaters, museums, cinemas, libraries, tourist offices, and, as far as possible, have access to monuments and places of national cultural significance. These individuals are enabled and encouraged to use their creative, artistic, creative potential as well as the appropriate protection of intellectual property. In terms of sports activities, people with disabilities are encouraged to participate on an equal basis to encourage and promote their participation in regular sports activities at all levels, organizing, developing and participating in sports and recreational activities specific to the disability, and it is especially important to provide of these persons to have adequate access to sports, recreational and tourist facilities.

The process of monitoring all the rights arising from this Convention is very important and that is why the section on Statistics and Data Collection is specially mentioned in Article 31. States have a responsibility to gather relevant information, including statistics and research data, which will enable them to formulate and implement policies to implement the Convention, as well as to identify obstacles and barriers that these individuals face in exercising their rights.

Of course, this system provided by the Convention is a global system and in order to succeed, there must be adequate international cooperation. This is provided in Article 32, according to which, there must be such cooperation between states, and of course in partnership with relevant international and regional organizations and civil society, especially with organizations of persons with disabilities, in international development programs, experiences, training programs and best practices, facilitating research cooperation and access to scientific and technical knowledge, through appropriate technical and economic

assistance and technology transfer.

In order to have successful international cooperation, there must be provisions for National Implementation and Process Monitoring. Article 33 states that in accordance with the national legal system, States should designate one or more key points in regulating the implementation of the Convention, as well as paying attention to the establishment or designation of a coordination and monitoring mechanism in regulation, of course, with the inclusion of civil society organizations of persons with disabilities.

At UN level, Article 34 of the Convention establishes a Committee on the Rights of Persons with Disabilities within the UN. In the beginning it was composed of 12, and later of 18 experts from all over the world, elected by secret ballot by the Conference of the States Parties, taking into account the geographical and civilizational representation. The members of the Committee should be people with high moral principles and recognized competencies and experience in the field covered by the Convention.

Art. 35 regulates the Reports from the states parties, as a mechanism for national monitoring of the provisions of the Convention, and the presentation of the measures taken and the progress made at the national level. Such reports shall be submitted to the Committee at least every four years, at the request of the Committee, which shall decide on the guidelines to be applied to the content of the reports.

The section for review of reports is regulated in Art. 36. The Committee shall consider each report, make proposals and general recommendations, where appropriate, and forward them to the State Party, which may respond to the Committee with the information. The Committee may request additional information from States Parties relevant to the implementation of the Convention. If a State is significantly late in submitting its report, the Committee may notify the State Party concerned of the need to examine the implementation. Each State Party shall ensure that its reports are made available to the public in their own country.

Cooperation between the States Parties and the Committee is regulated in Article 37, and such cooperation and coordination is more than beneficial, with a view to improving national capacities for the implementation of the Convention.

For the purpose of effective implementation, better international co-operation and inter-ministerial co-ordination within the UN, the Convention in Article 38 provides for the Committee's relations with other UN bodies. Thus, according to the provisions, specialized agencies and other UN bodies have the right to be present during the review of the implementation of the provisions of the Convention, in accordance with their competencies.

Art. 35 regulates the Reports from the signatory states, as a mechanism for national monitoring of the provisions of the Convention, and the presentation of the measures taken and the progress made at the national level. Such reports shall be submitted to the Committee at least every four years, at the request of the Committee, which shall decide on the guidelines to be applied to the content of the reports.

The section for review of reports is regulated in Art. 36. The Committee shall consider each report, make proposals and general recommendations, where appropriate, and forward them to the signatory State, which may respond to the Committee with the information. The Committee may request additional information from States Parties relevant to the implementation of the Convention. If a State is significantly late in submitting its report, the Committee may notify the State Party concerned of the need to examine the implementation. Each State Party shall ensure that its reports are made available to the public in their own country.

Cooperation between the repressive States and the Committee is regulated in Article 37, and such cooperation and coordination is more than beneficial, with a view to improving national capacities for the implementation of the Convention.

For the purpose of effective implementation, better international co-operation and inter-ministerial co-ordination within the UN, the Convention in Article 38 provides for the Committee's relations with other UN bodies. Thus, according to the provisions, specialized agencies and other UN bodies have the right to be present during the review of the implementation of the provisions of the convention, in accordance with their competencies. Art. 39 refers to the Report of the Committee, which every 2 years, submits a report on its activities to the UN General Assembly, and to the Economic and Social Council, where it can make proposals and general recommendations based on the examination of the reports and information received from States Parties.

The Committee is a kind of executive body responsible for executive functions under the Convention, and the Conference of the States Parties, regulated in Art. 40, is a kind of Assembly of all signatory states. The States meet regularly at a Conference of the States Parties to consider any questions concerning the implementation of the Convention. Meetings of the Conference shall be convened by the Secretary-General of the United Nations every two years or by decision of the Conference of the States Parties.

The Convention ends with provisions of a technical nature, from Art. 41 to Article 50, which refer to the Depository, the Signature, the Commitment Agreement, the Regional Integration Organizations, the Entry into Force of the Convention, Reservations, Amendments, Cancellations, the Accession Format, and the Authentic Texts.

The following is an analysis of the various instruments and activities for accessible tourism, adopted by the competent UN Specialized Body for Tourism, the World Tourism Organization - *UNWTO*.

1.2. Recommendations on Accessible Tourism

The Recommendations on Accessible Tourism⁹ were adopted in November 2013 by the World Tourism Organization. "Accessibility is a central element of any responsible and sustainable tourism policy. It is both an imperative for human rights and an exceptional business opportunity. First of all, it must be understood that access tourism does not only benefit people with disabilities or special needs; it benefits everyone".¹⁰

Providing safe, convenient and economical transport and other infrastructure related to tourism is a key factor for its success. Infrastructure that does not adequately care for the needs of people with disabilities, including infants and the elderly, excludes many destinations from this promising business opportunity. The fact is, however, that people with disabilities experience mobility or access problems, as well as information about it, and are therefore often unable to enjoy the freedom of travel as other citizens do. The number of accessibility issues is huge, and tourists can be affected in every part of their journey, whether it be access to information, local transportation, accommodation, visits and participation in cultural or sporting events, whether are spectators or participants.

According to the Declaration on the facilitation of tourist travel, adopted in 2009 by the World

⁹ World Tourism Organization (2013), Recommendations on Accesible Tourism, UNWTO, Madrid

¹⁰ According to Taleb Rifai, former UNWTO Secretary General. It is a special honor that in 2014 he visited and gave a lecture at the Faculty of Tourism and Hospitality in Ohrid.

Tourism Organization, facilitating tourist travel for people with disabilities is an essential element of any responsible tourism development policy. Therefore, the inclusion of disability issues as an integral part of relevant sustainable development strategies ensures that tourism policies and practices include persons with disabilities, in order to achieve equitable and accessible tourism for all.

The tourism industry recognizes that persons with disabilities have equal rights to tourism services and opportunities in terms of independent travel, available facilities, trained staff, confidential information and inclusive marketing.

As the demand for accessible tourism for all grows, it must be seen as an opportunity, not an obligation. If the tourism industry wants to maintain and develop quality, sustainability and competitiveness, it must support and develop the concept of tourism accessible to all, because it benefits everyone. The logic is that the more tourists enjoy the opportunity to travel, the more the tourism industry gets visitors, longer seasons and new revenue.

In this context, accessible tourism, as a tourism for all, is not only about providing access to people with disabilities, but also about creating universally designed environments that can support people who may have a temporary disability, families with small children, an ever-growing older population.

The Concept of Affordable Tourism for All is a form of tourism that involves a process of stakeholder collaboration that enables people in need of accessibility, including mobility, visual, audio and cognitive dimensions of accessibility, to operate independently, fairly and with dignity through delivery of universally designed tourism products, services and environments.

"Universal design" means the design of products, environments, programs and services that can be used by all people, to the fullest extent possible, without the need for adaptation or specialized design. It does not exclude assistive devices for certain groups of persons with disabilities when necessary, and promotes a change to a user-focused design by following a holistic approach and adapting to the needs of such persons, regardless of any changes that they could experience in their lifetime. Universal design is a concept that extends beyond the issues of ordinary accessibility of buildings for people with disabilities and should become an integrated part of policies and planning in all aspects of society. 7 principles of **universal design** are:

- Fair and equal use
- Flexibility in use
- Simple and intuitive use
- Easily noticeable information
- Error tolerance
- Little physical effort
- Appropriate size and space for access and use

These recommendations indicate appropriate measures to ensure that persons with disabilities have equal access, on an equal basis with others, to physical space, transport, information and communications, including computer systems, and information and communication technology and other open services and facilities.

Accessibility must be present throughout the tourism chain, links between all sites, services and activities must be well planned and tested.

The elements of the tourist chain include:

1. Tourist Destination Management. The concept of an accessible tourist destination in a

locality, region or area must have the necessary available facilities, infrastructure and transport in order to create an environment that is diverse, stimulating and easily accessible.

2. Tourism and Advertising Information - Preparation, information and reservations, Reservation systems should be available for each tourist to be able to communicate with them independently. To this end, websites and other booking systems should be designed to be accessible to all, following the Web Content Accessibility Guidelines (WCAGs) published at www.w3c.org¹¹. Entities responsible for receiving and dealing with consumer complaints should record and resolve, through an appropriate procedure, all complaints relating to deficiencies in the provision of services and facilities whose accessibility has been displayed or advertised.

3. Urban and architectural environments, and requirements to be met by tourist facilities and locations, in relation to the Parking lots, there should be separate parking spaces with appropriate identification for vehicles of persons with reduced mobility, as close as possible to the entry and exit points of buildings or tourist attractions. With regard to communication, the use of sign language, Braille and in additional and alternative ways, means and formats of communication and all other ways, means and formats of communication chosen by persons with disabilities should be accepted and facilitated. In terms of Marking, information counters, check-in and ticketing counters should be clearly marked and have an access area reserved for use by persons with reduced mobility located as close as possible to the entrance. Announcements should be both visual and audible. With regard to Horizontal Movement, effective measures need to be taken to ensure that persons with disabilities can move around the place with the greatest possible independence. Main corridors and crossings should be free of physical and visual barriers and have a width to allow two wheelchairs to pass next to each other so that they are not blocked in normal circulation, or otherwise provide crossing points. In terms of Vertical movement, it is regulated by elevators, stairs and ramps. Multi-storey structures should have an adequate number of elevators wide enough for a person using a wheelchair to enter and move easily. They should be specially designed and equipped for easy use by such persons and the blind (ie location of control buttons, Braille, written and audio information). They should be equipped with emergency systems accessible to the hearing impaired. In terms of public hygiene, according to these Recommendations, on the same place where the toilets are located, accessible toilets and sinks should be placed, taking into account the dimensional aspects and the necessary technical aids needed for the transfer between the wheelchair and the toilet. Attention should also be paid to the access area to the toilet and sink, as well as to the taps and activation mechanisms. In terms of prices, whenever possible, travel providers must provide adequate infrastructure and services for disabled visitors. Costs of implementing physical accessibility measures should be included in the items for maintenance costs or general works. The additional costs required to provide available services and facilities should not lead to an increase in prices for tourists with special needs.

4. Modes of transport and stations. Passenger vehicles, including private rental vehicles, buses, taxis, trams, cable cars, trains, passenger ferries, and cruise ships should be designed to provide safe, comfortable, and equitable transportation for people with disabilities or

¹¹ <https://www.w3.org>

reduced mobility. The information provided to passengers must be available in visual, acoustic formats, but also through websites or mobile applications. Passengers with disabilities should have easy access to stations, passenger terminals and related facilities. On main roads, and especially on toll highways, rest stops, equipped with toilets, and emergency telephones should be provided.

5. Accommodation facilities, catering services, conferences and conventions.

Accommodation facilities should have a reasonable number of rooms that are fully accessible without assistance, and should be designed so that users can move around, locate facilities and services, and communicate in a comfortable and independent manner. This applies to the bathroom as well as the terrace or the adjacent outdoor area. In terms of food services, an adequate number of restaurants, cafes, and bars in the area should be provided, with accessible facilities that take into account the existence of easy external access, furniture designed for use by persons with disabilities, accessible toilets, counters of various heights, menus with easy-to-read text, in Braille or in alternative formats - web or mobile applications. Menus should include additional options for people with different types of food intolerances, e.g. diabetics, people with various allergies, gluten intolerance, etc. Conference facilities should be equipped with special seats or areas reserved for wheelchair users and special headphones and / or audio induction devices for the hearing impaired.

6. Cultural activities - museums, theaters, cinemas. Museums and other buildings with historical, cultural and religious content suitable for the tourist interest should address horizontal or vertical access problems by providing ramps or lifts as appropriate. Information should be available to visitors who are deaf or blind, in both written and audio formats. Customer service staff should have the necessary training needed to properly treat and serve visitors with disabilities. Theaters and cinemas should be equipped with special seats or areas reserved for wheelchair users and special headphones and / or audio induction loop facilities for the hearing impaired.

7. Other tourist activities and events. It should be ensured that people with disabilities have access to sports, recreation and tourism facilities. Excursion buses should be equipped to accommodate tourists with physical disabilities and to provide auditory and visual information. Whenever possible, excursion companies should hire sign language interpreters for deaf tourists and / or provide printed descriptive material for all places visited. Green areas and natural environments should have accessible routes that run through the site, connecting areas of interest, toilets and other services and facilities. Long walkways should be equipped with adapted fountains and benches, with adequate access to allow wheelchair users and those using walking aids access. Drainage lids and bars around the trees should be level with the pavement and firmly attached to the ground. The beaches should be provided with access routes that provide access to information points, spaces, facilities or services. They should have access through footpaths and ramps, enclosed areas in the sun and shade, adapted changing stations and services, amphibious chairs and crutches for swimming in the sea, with the help of a team of professionals.

Tourist staff plays an important role in reducing potential access deficits or mitigating unforeseen difficulties, and disability awareness and customer care training can minimize the barriers faced by people with disabilities. Staff should include employees who know how to

communicate with people with sensory disabilities. Staff should be trained to treat people with disabilities with courtesy and efficiency, to provide complete information on available services and facilities, and to facilitate access.

Assistance to humans and animals should be provided, as well as specific and relevant information on hotel services and external services including guides, interpreters and professional sign language interpreters to facilitate access to buildings and other facilities open to the public.

Security staff accommodating and transporting persons with disabilities should, at all times and as a general rule, have a list of rooms or partition numbers occupied by those persons as a precautionary measure in the event of an emergency. Staff should be trained to evacuate persons with disabilities in an emergency.

1.3. Manual on Accessible Tourism for All

The Manual¹² on Accessible Tourism for All: principles, tools and good practices, adopted by the World Tourism Organization in 2016, is a reference document for the tourism sector, as it proposes guidelines for achieving accessibility to destinations in the most efficient and best planned way possible.

This Manual is part of the WTO Strategy for the Promotion of Responsible, Sustainable and Universally Available Tourism globally, encouraging key stakeholders to implement measures that result in greater participation of diverse groups in tourism.

The Manual **consists of 5 modules** that cover the main issues to be considered when implementing accessibility in tourism, as follows:

- Module I: Definition and Context
- Module II: Accessibility Chain and Recommendations
- Module III: Main areas of action
- Module IV: Indicators for studying accessibility in tourism
- Module V: Good Practices

Recommendations for Module I: Definition and Context

Module I establishes some theoretical foundations and discusses barriers to accessibility in tourism-related activities. It describes the wide range of users of inbound tourism, highlighting the emergence of "adult tourists", whose tourism activity is similar or even greater than other parts of the population and whose needs and requirements require accessibility measures. Provides analysis of the economic impact of accessibility on tourism, as well as through statistics, which confirm the fact that accessibility, in addition to being a right, is also a very important business opportunity.

Accessibility, sustainability and equitable participation of all make up what is known as "Tourism for All". These principles promote quality in tourist destinations and increase their competitiveness. Module I analyzes the different concepts and user profiles of Accessible Tourism and its wider social and economic benefits.

¹² World Tourism Organization (2016), Accessible Tourism for All: An Opportunity within Our Reach, UNWTO, Madrid

The concept of "Accessible Tourism" refers to the adaptation of environments and tourism products and services to provide access, use and enjoyment for all users, according to the principles of Universal Design¹³.

Everyone needs accessibility in tourism, because everyone is looking for accessible environments, products and services at some point in life, whether due to disability, illness, accident, pregnancy, old age or simply because people, for example, carry oversized luggage or because they are unfamiliar with the environment. These conditions can affect both tourists and locals in a particular destination.

As mentioned earlier, people with disabilities make up 15% of the world's population, which is a huge number. The world's population is aging. The data say that in 2019, the number of people aged 60 and older was 1 billion. This number is expected to increase to 1.4 billion by 2030, and in 2050 it is expected to be about 2.1 billion 60 years old and older¹⁴, it is a 100% increased opportunity for tourism development and should be used by all, because older tourists can have a stable income, more free time and greater availability, and therefore require accessible services to travel without difficulty.

It is in everyone's interest for the tourist product or destination to be accessible and available. Accessibility is a human right recognized by many documents, and the most important is the UN Convention on the Rights of Persons with Disabilities.

Accessibility is at the service of customers, recommendations and legal obligations are easier to perform when the destination understands the real needs of different customers and the reason for their requests.

Accessibility is an investment, if taken into account from the very beginning of the design or implemented through small changes, significant improvements are achieved that can lead to an increased share of market revenue.

Accessibility delivers great results, improves competitiveness and promotes customer loyalty. Destinations that do not meet the access requirements run the risk of being found outside the modern tourism market.

Accessibility generates customer satisfaction, it leads to improved quality of service and provides a better experience by the tourist.

Recommendations for Module II: Accessibility Chain and Recommendations

Module II presents recommendations in accordance with the specifications of the Universal Design based on the most current international standards, including ISO FDIS 21542 for Buildings¹⁵, Accessibility and usability of the built environment. According to the provisions of this Standard, which has its own version since 2011, but also an extension in June 2021, a series of requirements and recommendations are specified for the elements of construction, building assemblies, components, products related to the design and constructive aspects of usability and accessibility of buildings, ie. access to buildings, circulation in buildings, exit from buildings under normal conditions and evacuation in case of fire. This standard applies to new buildings and new works in existing buildings. It introduces the concept of "exceptional considerations and adaptation of existing buildings" to situations where it is extremely difficult to meet the stated requirements and, therefore, it is impossible to ensure full accessibility. With the help of "exceptional reviews of existing buildings", an acceptable, albeit limited, level of accessibility is determined.

¹³ Previously mentioned in Part 1.2.

¹⁴ https://www.who.int/health-topics/ageing#tab=tab_1

¹⁵ <https://www.iso.org/standard/71860.html>

The dimensions listed in this document, relevant to the use of wheelchairs, are related to the commonly used sizes of wheelchair users as specified in ISO 7176-5 of 2008, Wheelchairs - Part 5: Determination of dimensions, mass and space for maneuvering¹⁶ and ISO / TR 13570-2, 2014, Wheelchairs - Part 2: Typical values and recommended limits for dimensions, mass and maneuverability as defined in ISO 7176-5¹⁷, 800 mm wide and 1,300 mm long. These standards primarily apply to adults with disabilities, but also contain recommendations for the specific accessibility needs of children.

The recommendations in Module II form the basis for creating accessible tourist destinations and place special emphasis on the value chain of accessibility in tourism, analyze several key points: planning and information, transport, accessibility to the environment, accessibility to common areas and accessibility to certain spaces. Each of these sections meets the accessibility needs of different tourist environments, from hotels, tourist information offices and sports facilities, to natural environments, beaches and transportation.

Accessibility through the tourist valorization chain avoids the creation of "accessibility islands" that threaten the security and integrity of the tourist experience. One should make the journey with maximum independence and pleasure, starting from the planning stage until returning home. And then the dilemma arises whether it is beneficial to have a fully accessible hotel if the transport to get to it is not available, of course the accessibility must be in the whole chain of services.

Module II proposes several recommendations for creating accessible tourist destinations:

The information is crucial, it is essential to provide reliable and timely data on the accessibility conditions of the destination. The information should reach all users through the available documents and formats, which are discussed above.

Uninterrupted chain, destinations should create a comprehensive offer of tourism for all products and services - in which all elements of the supply chain - reservation systems, accommodation, transport, will be easily accessible.

The challenge of transport is to have adequate means of transport to reach the destination, but also to have movement in it. If a destination does not offer this, the tourist will decide not to take the trip.

Safety and security, when facilities are available, safety and security standards for all visitors should be considered, as well as safeguards to prevent possible harm to tourists.

Inclusiveness, it is necessary to provide appropriate services in an integrated way within the products offered at the destination.

The attitude is everything, it is crucial to provide specific staff training to provide people with disabilities with adequate access, through the so-called individualized services.

Recommendations for Module III: Main Areas of Action

Module III examines the areas of intervention that form the cornerstone of success in achieving accessible tourism, and is intended for those responsible for managing tourist destinations. Planning accessible destinations depends on strategic cooperation between the public and private sectors, together with civil society actors. These areas of intervention specifically include 5 key points:

1. Legislation that emphasizes the need for legislation on equal rights and prohibition of all forms of discrimination;

¹⁶ <https://www.iso.org/standard/46429.html>

¹⁷ <https://www.iso.org/standard/41687.html>

2. Supply and demand research, as a starting point to know the impact of accessible tourism on overall tourism;
3. Raising awareness. Cultural differences in how people with disabilities are perceived affect the awareness of accessibility. The introduction of appropriate training enables standardization and consideration of special needs by tourism professionals, and this should be included in the system of formal education.
4. Comprehensive implementation of accessibility. In addition to the implementation of the recommendations, it is desirable to have a strategic plan for accessibility in destinations, so that the activities will be structured in accordance with the identified needs for accessibility. The management with this strategic plan enables long-term continuity of the accessibility measures and prevents the making of initiatives for improvement of the destination, which would be isolated and arbitrarily implemented.
5. Promotion of tourism products and services through marketing strategies. It is not useful just to have an accessible destination, if the offered products and services are not communicated to potential tourists. Incorporating accessibility into the usual promotional channels should be part of the implementation of marketing strategies.

Recommendations for Module IV: Indicators

Module IV of the Manual describes a set of indicators, intended for use by national tourism organizations, to be able to assess the development of accessibility in tourist destinations. These indicators, accompanied by the appropriate methodology for their application, make a great contribution to the management and evaluation of accessibility in tourism.

Module IV proposes a number of indicators developed in order for tourist destinations to be able to assess, monitor and manage the availability of their accessible tourism offer. These indicators can answer the following questions:

What percentage of the country's official tourist websites contain information on destination accessibility? How many provide this information in accessible formats? What percentage of hotels or travel agencies have adequate access? How many of them have an accessibility certificate? How many hotels in the destination can be reached directly through adapted public transport? What percentage of parking spaces are available for customers who decide to use their own vehicles? How many train stations in the region have staff trained to attend to clients with disabilities?

These are really important things for every tourist, and giving answers to such questions provides a much greater understanding of the destination itself, its characteristics, as well as acquainting potential tourists with everything that is important for them to decide to realize their trip in such destinations.

Indicators help to assess the level of development and management of accessible tourism infrastructure, destination products and services; contribute to the preparation of objective comparative analyzes between the elements, products and services of the tourist infrastructure; are a useful tool for prioritizing activities in the field of accessibility; contribute to the standardization of accessibility in the sector; enable the adoption of appropriate policies and improved planning of the future based on the obtained results, justify the decision-making for planning and management of tourism in a given area.

Recommendations for Module V: Good Practices

The last section of the Manual - Module V - presents a selection of good practices that serve as relevant examples for stakeholders in implementing accessibility improvements in tourism.

It emphasizes the good practices in the implementation of concrete measures to make accessible tourism a reality. The good practices listed in the Manual provide successful examples in the following areas: Promotion, Research, Training, Travel Agencies, Accommodation, Transport, Destination, Tourism Information and Tourism Activities.

1.4. UN Resolution. Transforming Our World: the 2030 Agenda for Sustainable Development

One of the newer UN documents, which have a special significance and weight for the new times that are coming on a global level is the so-called Agenda 2030.

The Agenda is a global action for the coming years, and it is a document of crucial importance for the people and the planet Earth in the XXI century. It was adopted by a Resolution of the UN General Assembly on September 25, 2015, and is called “Transforming our world: the 2030 Agenda for Sustainable Development”¹⁸.

It promotes 17 main goals for sustainable development, developed through 169 targets and measures, which demonstrate the scale and ambitions of this new universal agenda. They are building on the Millennium Development Goals, and will try to accomplish what they have not achieved. They will enable the realization of the human rights of all. Goals are integrated and indivisible, and balance the three dimensions of sustainable development: economic, social and environmental. The peoples of the planet Earth are determined to nurture peaceful, just, and inclusive societies free from fear and violence. There can be no sustainable development without peace and there can be no peace without sustainable development.

UN member states want to create the conditions for sustainable, inclusive and maintainable economic growth, mutual prosperity and decent work for all, taking into account the different levels of national development and capacities. This should result in a comprehensive, far-reaching and focused set of universal and transformative goals for people, recognizing that the dignity of the human person is fundamental to all peoples and to all segments of society. These are universal goals and objectives that include the whole world, developed and developing countries, of course taking into account the different national realities, capacities and levels of development.

The vision of Agenda 2030 is a world with equitable and universal access to quality education at all levels, to health care and social protection, where physical, mental and social well-being is provided. A world of universal respect for human rights and human dignity, the rule of law, justice, equality and non-discrimination, respect for race, ethnicity and cultural diversity, as well as equal opportunities that enable the full realization of human potential and contribute to shared prosperity.

The common principles and obligations of Agenda 2030 are guided by the aims and principles of the UN Charter, including full respect for international law. It is based on the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the Millennium Declaration. Sustainable development recognizes that the eradication of poverty in all its forms and dimensions, the fight against inequality within and between countries, the preservation of the planet, the creation of sustainable, inclusive and maintainable economic growth and the promotion of social inclusion are interrelated and interdependent.

¹⁸ <https://sdgs.un.org/2030agenda>

Agenda 2030 through those 17 goals for sustainable development, with 169 related targets and measures, are integrated and indivisible. It should be trusted, because never before have world leaders promised joint action and effort through such a broad and universal political agenda. The new goals, targets and measures are formally entered into force on the 1st of January 2016 and lead the decisions that will be taken in the coming years until 2030. Everyone should strive to implement the goals of Agenda 2030, within their own countries, regionally and globally, taking into account the different national realities, capacities and levels of development and respecting national policies and priorities.

People who are vulnerable must be encouraged and empowered. Those whose needs are reflected in the Agenda include all children, young people, people with disabilities, of whom unfortunately more than 80% live in poverty, people living with HIV / AIDS, the elderly, indigenous peoples, refugees and internally displaced persons and migrants.

Inclusive and equitable quality education must be provided at all levels - early childhood, primary, secondary, higher, technical and vocational education. All people, regardless of gender, age, race, ethnicity and people with disabilities, migrants, indigenous peoples, children and young people, especially those in vulnerable situations, should have access to lifelong learning opportunities that will help them acquire knowledge and skills needed to seize opportunities and participate fully in society.

Together they should foster intercultural understanding, tolerance, mutual respect and ethics of global citizenship and shared responsibility. Sport is also a very important link, as an important promoter of sustainable development. It has a growing contribution to the realization of development and peace in its promotion of tolerance and respect and its contributions to the empowerment of women and youth, individuals and communities, as well as to the goals of health, education and social inclusion.

In terms of the implementation monitoring and review process, national authorities have a primary responsibility for this, at national, regional and global level, in terms of progress made in achieving the objectives. The High Level Political Forum, under the auspices of the UN General Assembly and the UN Economic and Social Council, has a central role to play in overseeing global monitoring and oversight. Indicators are being developed to help. This requires quality, accessible, timely and reliable data processing to help measure progress and ensure that no one is left behind. Such data are crucial for decision making.

Goals, targets and measures for sustainable development

Goals are defined as aspirational and global, with each government setting its own national goals guided by the global level of ambition, but taking into account national circumstances. Each country decides how these global goals should be incorporated into national planning processes, policies and strategies to achieve sustainable development. Planet Earth and its ecosystems are the common home of all peoples and should feel like "Mother Earth", which is a common expression in many countries and regions.

The main goals for sustainable development are:

- 1. End poverty in all its forms everywhere**
- 2. End hunger, achieve food security and improved nutrition, and promote sustainable agriculture**
- 3. To ensure a healthy life and promote well-being for all of all ages**
- 4. Provide inclusive and equitable quality education and promote lifelong learning opportunities for all**
- 5. Achieving gender equality and empowerment of all women and girls**

6. **Ensure accessibility and sustainable water and sanitation management for all**
7. **Provide access to affordable, safe, sustainable and modern energy for all**
8. **Promoting sustainable, inclusive and maintainable economic growth, full and productive employment and decent work for all**
9. **Building resilient infrastructure, promoting inclusive and sustainable industrialization and fostering innovation**
10. **Reducing inequality within and between countries**
11. **Make cities and human settlements inclusive, safe, resilient and sustainable**
12. **Providing sustainable consumption and production models**
13. **Take urgent action to combat climate change and its impacts**
14. **Conservation and sustainable use of oceans, seas and marine resources for sustainable development**
15. **Protect, restore and promote the sustainable use of terrestrial ecosystems, sustainable forest management, combat desertification and halt land degradation and halt biodiversity loss**
16. **Promote peaceful and inclusive societies for sustainable development, ensure access to justice for all and build effective, accountable and inclusive institutions at all levels**
17. **Strengthening the means for implementation and revitalization of the Global Partnership for Sustainable Development.**

Due to the relation of this Study, only those goals, targets and measures that are related in some way to the accessibility of persons with disabilities will be analyzed in the following section.

Goal 4. To provide inclusive and equitable quality education and promote lifelong learning opportunities for all

According to the Agenda, by 2030 Equal access for all women and men to acceptable and quality technical, vocational and higher education should be ensured. By 2030, the number of young people and adults who have relevant skills, including technical and vocational skills, that will be useful for employment, as well as having decent jobs and appropriate entrepreneurship, should increase significantly.

By 2030 Gender differences in education should be eliminated and equal access to all levels of education and vocational training should be provided for vulnerable categories of citizens, including persons with disabilities, indigenous peoples and children in vulnerable situations. To build and upgrade educational facilities that are sensitive to children, persons with disabilities, and persons according to gender, and to provide safe, non-violent, inclusive, and effective learning environments for all.

Goal 8. Promoting sustainable, inclusive and maintainable economic growth, full and productive employment and decent work for all

The measures to achieve this goal are: Maintaining economic growth per capita in accordance with national circumstances and, in particular, at least 7% GDP growth per year in the least developed countries. By 2030, the goal is to achieve full and productive employment and decent work for all women and men, including young people and people with disabilities, and equal pay for work of equal value. By 2030 policies should be designed and implemented to promote sustainable tourism, which creates jobs and promotes local culture and products.

Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization, and foster innovation

Quality, secure, sustainable and resilient infrastructure needs to be developed, including regional and cross-border infrastructure to support economic development and human well-being, with a focus on accessibility and equitable access for all. One of the goals is to significantly increase access to information and communication technology and to aim at providing universal and affordable Internet access in the least developed countries by 2020.

Goal 10. Reduce inequality within and between countries

By 2030, progressively achieve and maintain the income growth of the poorest 40% of the population, at a rate higher than the national average income.

During this period, to strengthen and promote the social, economic and political inclusion of all, regardless of age, gender, disability, race, ethnicity, origin, religion or economic or other status.

Ensure equal opportunities and reduce inequalities, including by eliminating discriminatory laws, policies and practices and promoting appropriate legislation, policies and activities in this area.

Goal 11. To make cities and human settlements inclusive, safe, resilient and sustainable

By 2030, access to adequate, safe and affordable housing and basic services should be provided for all and slums should be upgraded.

During this period, access to safe, accessible, affordable and sustainable transport systems for all should be provided, improving road safety, especially by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, people with disabilities and the elderly.

Strengthen inclusive and sustainable urbanization and the capacity for participatory, integrated and sustainable urban planning and management in all countries.

Strengthen efforts to protect and preserve world cultural and natural heritage.

Provide universal access to safe, inclusive and accessible green and public spaces, especially for women and children, the elderly and people with disabilities.

Goal 12. Provide sustainable consumption and production models

Development and implementation of tools for monitoring the impacts of sustainable development on sustainable tourism, which creates jobs and promotes local culture and products.

Goal 14. Conservation and sustainable use of oceans, seas and marine resources for sustainable development

In the envisaged period, to increase the economic benefits for the small developing island states, and the least developed countries, through sustainable use of marine resources, and through sustainable management of fisheries, aquaculture and tourism.

The goals mentioned above mean that the global partnership must be at the highest level, but also the cohesive national strategies for sustainable development, supported by the integrated national funding frameworks, occupy a very important place for the implementation of the goals.

In terms of monitoring and review processes at all levels, they should be guided by the following principles: Their voluntariness, leadership at the national level, taking into account different national realities, capacities and levels of development and respect for space policies and priorities. They should monitor progress in the implementation of universal goals and objectives, including the means of implementation, in all countries in a way that respects their universal, integrated and interconnected nature. They will maintain a long-term orientation, identify achievements, challenges, strides and critical success factors, and support countries in making informed political choices. They will be open, inclusive, participatory and transparent to all people. They will be people-oriented, gender-sensitive, respectful of human rights, and have a special focus on the poorest, most vulnerable, and the underprivileged. In that process, everyone will benefit from the active support of the UN system and other multilateral institutions.

Goals, targets and measures will be monitored and reviewed using a set of **global indicators**. They will be supplemented by indicators at regional and national level, to be developed by the Member States. National reports will provide an assessment of progress and identify regional and global challenges.

At the national level, all Member States are encouraged to develop national development and sustainable development strategies as soon as possible. National parliaments, as well as other institutions, can also support these processes. The goal is to support indigenous peoples, civil society, the private sector and other stakeholders, in line with national circumstances, policies and priorities.

At regional level, UN regional commissions are encouraged to continue to support member states in this regard.

Globally, the Senior Political Forum for Sustainable Development has the most important operational role. It plays a central role in overseeing the network of monitoring and review processes globally, working coherently with the General Assembly, the Economic and Social Council, and other relevant bodies and forums, in line with existing mandates.

The monitoring and review of information in the Forum will be done through an annual report on the progress of the Sustainable Development Goals, which will be prepared by the UN Secretary General in cooperation with other bodies of the UN system, based on the global framework of indicators and data produced by national statistical systems and information collected at the regional level.

There will be meetings every 4 years under the auspices of the UN General Assembly, where the Forum is to articulate high policy directions and views on Agenda 2030, and its implementation, identifying progress and new challenges, and mobilizing further action to accelerate its implementation.

2. European System for Ensuring Accessibility

In addition to the global accessibility system, mainly represented through the UN system, and the specialized bodies and agencies within the UN, there are also continental and regional accessibility systems, based on the geographical areas of the world. In general, such systems are in fact an extension and implementation of global standards at the regional level, although in the case of the European Continent, there are certain specifics.

The system of ensuring accessibility at the European level can be considered in two directions, namely: **through the activities of the Council of Europe**, as the oldest and leading organization at the European level for the protection of human rights, created in 1949, as well as **through the activities of the EU**, as an integrated system of several countries at the level of the continent, which has its beginnings since 1951 and is the most powerful socio-political and economically integrated community in the world.

2.1. System for Ensuring Accessibility within the Council of Europe

The Council of Europe is the oldest European political organization, established in 1949. It has 47 member states, from the European continent, 1 country is a candidate for membership - Belarus, and the other 5 non-European countries are observers - USA, Canada, Japan, Mexico and the Vatican, which means that it is a very important organization, which, although European, still has a wider influence in the world.

Of the 47 member states of the Council of Europe, all the current 27 EU member states plus the United Kingdom are part of the Council of Europe, which is a very significant fact of how important this organization is.

Republic of North Macedonia¹⁹ in 1995 became the 38th member of the Council of Europe. With regard to human rights and the rights of persons with disabilities, the Council of Europe has regulated this issue in its documents since its inception, because the importance of accessibility and the rights of persons with disabilities is indeed a fundamental human right. On this occasion, a review of 4 such fundamental documents will be given: European Convention on Human Rights, European Charter, Recommendation 1592: Towards full social inclusion of persons with disabilities and Recommendation 2064: Equality and inclusion for persons with disabilities.

1. The basic document of the Council of Europe is the **European Convention on Human Rights**²⁰, signed on 04.11.1950, and entered into force on 03.08.1953, and its subsequently adopted 16 Additional Protocols, up to 2021. This Convention is logically derived from the 1948 UN Universal Declaration of Human Rights.

The European Convention on Human Rights is composed of a Preamble and two parts - the first part refers to Rights and Freedoms, and the second part is the European Court of Human Rights. In the first part, all provisions can be related to persons with disabilities, but the most important are the provisions of Article 14 which refer to the prohibition of discrimination, on any grounds. The provision for Article 14 is supplemented by Protocol no. 12 to the Convention on Human Rights, dated 04.11.2000. According to Art. 14, the basic principle that all people are equal before the law and have the right to equal legal protection must be taken into account, reaffirming that the principle of non-discrimination does not prevent Member States from taking measures to promote full and effective equality, provided that there is an objective and reasonable justification for those measures. Article 14, which is entitled General Prohibition of Discrimination, states that the enjoyment of any right provided by law shall be guaranteed without discrimination on any grounds, such as sex, race, color, language, religion, political or other opinion, national or social origin, affiliation with a national minority,

¹⁹ <https://www.coe.int/mk/web/skopje/the-council-of-europe>

²⁰ https://www.echr.coe.int/Documents/Convention_MKD.pdf

property, birth or other status. No one should be discriminated against by a public authority on any grounds.

2. The European Social Charter²¹ adopted on 18.11.1961 and was revised on 3 May, 1996. Republic of North Macedonia, in addition to being part of SFR Yugoslavia, has also signed the revised Charter on 27.05.2009. This Charter is complementary to the European Convention on Human Rights, and it complements the respective social and economic rights of the human and the citizen. In this part, the provisions of Article 15 are important, which refer to the Right of persons with special needs to independence, social integration and participation in social life. According to its provisions, in order to ensure the effective realization of the right of persons with disabilities to independence, social integration and participation in social life, regardless of their age, nature and origin of their disability, the states undertake to:

- Take the necessary measures to provide for people with disabilities orientation, education and vocational training within the general program where possible, or where this is not possible, through specialized public or private bodies;
- Improve their access to employment using all measures aimed at encouraging employers to employ and retain people with disabilities in the usual work environment and to adjust working conditions to the needs of people with disabilities, or where this is not possible due to the type of disability, by arranging or creating protected employment according to the degree of disability. In certain cases, such measures include the use of the services of specialized services for special deployment and support;
- Promote their full social integration and participation in social life, in particular through such measures, including technical assistance, aimed at overcoming barriers to communication and movement and providing access to transport, housing, cultural and recreational activities.

Also, below in Part V of the Charter in Article E, Anti-discrimination is explored. Under the provisions of that article, the exercise of the rights set forth in the Charter shall be ensured without any discrimination on any grounds, such as race, color, sex, language, religion, political or other belief, nationality or social origin; health, ethnic minority, birth or other status. Different treatment based on objective and reasonable reasons will not be considered discrimination.

3. Recommendation 1592: Towards full social inclusion of persons with disabilities (2003)²² is a logical continuation of the previous fundamental documents. It was adopted because, in the trend of the new millennium, the Council of Europe wants to reaffirm the previously set rights and promote them.

Some of the basic rights contained in the European Convention on Human Rights, its protocols and the Revised European Social Charter were not sufficiently exercised for many persons with disabilities, e.g. the right to education, the right to work, the right to private and family life, the right to protection of health and social security, the right to protection from poverty and social exclusion, the right to adequate housing, etc.

Although essential to improving the quality of life of people with disabilities, the right to support and assistance has not been sufficiently fulfilled. Guaranteeing access to equal

²¹https://www.mtsp.gov.mk/WBStorage/Files/European%20social%20charter%20_revised_%20MKD%20translation.pdf

²² <https://pace.coe.int/en/files/17074/html>

political, social, economic and cultural rights should be a common political goal for the next period as well. Equal status, inclusion, full citizenship and the right to vote also need to be further promoted and implemented.

Granting and guaranteeing rights, although necessary, can never be fully realized. People with disabilities, like all people, seek the love and affection that most often provide for their families. Therefore, specific measures and assistance are essential to help families who have such persons, to overcome the threats of many renunciations, and to provide a home to care for such persons, which is a much better and more natural alternative than life in other larger institutions.

4. Recommendation 2064: Equality and inclusion for people with disabilities (2015)²³ also provides opportunities to improve the quality of life of people with disabilities in Europe for the period 2006-2015, as well as to develop national policies that take into account rights of such persons.

The Action Plan of this Recommendation has helped people to see disability as a human rights issue, and therefore a new roadmap for the period 2016 to 2020 has been provided, in close consultation with organizations representing persons with disabilities.

The new roadmap required a focus on priority issues, such as: the legal capacity of persons with disabilities and measures aimed at ensuring their dignity and their full inclusion in society.

With this recommendation, the Council of Europe called on the European Bank for Reconstruction and Development to set the requirements for accessibility as a condition for lending for construction and renovation projects, and appealed not to finance the construction of large institutions for individuals with a disability.

The Council of Europe calls for disability to be taken into account in the specific activities it implements, in particular in its activities and campaigns to combat violence and hate speech.

2.2. Accessibility System within the European Union - EU

According to EU estimates, it was expected that by 2020²⁴, 1/5 of the EU population will have some form of disability.

The system for providing accessibility for people with disabilities, of course, occupies a very important place and has special regulation within the EU, as one of the most developed socio-political and integrated economic organizations in the world. Republic of North Macedonia, as an aspirant for EU membership, should meet European standards, both in other areas and for people with disabilities. It is a very strong organization, which has a large democratic capacity, which is a leader in respecting human rights, both *de facto* and *de jure*, and therefore in this Study several basic documents related to this issue will be considered. Of course, the basic fundamental value for the protection of the rights of persons with disabilities in the EU is the UN Convention on the Protection of the Rights of Persons with Disabilities from 2006, which entered into force in the EU in 2011. The UN Convention on the Protection of the Rights of Persons with Disabilities also entered into force in the Republic of North Macedonia in December 2011, although North Macedonia signed it on July 29, 2009.

²³ <https://pace.coe.int/en/files/21554>

²⁴ <https://ec.europa.eu/social/main.jsp?catId=1137>

On this occasion, several EU documents will be reviewed, which provide appropriate standards for people with disabilities, which should be met by both EU member states and the Republic of North Macedonia, as a candidate country for EU membership for more than 15 years. The following documents are placed in chronological order of their adoption and entry into force, and not in order of importance. I think that all those documents are important in their own way and that is why they find a place in this Study.

1. The Charter of Fundamental Rights of the EU²⁵, (2000/C 364/01), adopted on December 7, 2000. is structured by a Preamble and 7 chapters. It reaffirms the fundamental principles on which the EU is based. The Charter is based on the indivisible and universal values of human dignity, freedom, equality and solidarity, on the principles of democracy and the rule of law. It puts the individual at the heart of its activities by establishing EU citizenship and by creating an area of freedom, security and justice.

2. The EU Directive²⁶ **2000/78/EC**, on establishing a general framework for equal treatment in employment and profession, dated 27.11.2000, in its general principles, recognizes the importance of combating all forms of discrimination, including the need to take appropriate actions for the social and economic integration of the elderly and persons with disabilities. The purpose of this Directive is to establish a general framework for combating discrimination based on religion or belief, disability, age or sexual orientation in relation to employment and profession, in order to enforce the principle of equal treatment in member states.

3. The EU Treaty, which is represented by the consolidated versions of the EU Treaty and the Treaty on the Functioning of the EU, Protocols, Annexes, Declarations attached to the final act of the Intergovernmental Conference that adopted the Treaty of Lisbon, signed on 13.12.2007²⁷ contains provisions significant to the subject of interest of this study. Article 10 states that in defining and implementing its policies and activities, the EU aims to fight against discrimination based on gender, racial or ethnic origin, religion or belief, disability, age or sexual orientation.

4. The European Disability Strategy 2010-2020²⁸: A renewed commitment to a barrier-free Europe, adopted by the European Commission of the EU, is a strategic document that considers issues, principles and recommendations related to disability. According to the Strategy, 1/6 of people in the EU have some kind of disability, ranging from mild to severe, with around 80 million people in the EU often prevented from fully participating in society and the economy due to spatial barriers, or attitudinal barriers. For people with disabilities, the poverty rate is 70% higher than average, partly due to limited access to employment. Regarding the Goals and Actions of the Strategy, its general goal was to empower people with disabilities so that they can enjoy their full rights and benefit fully from participation in society

²⁵<https://www.healthrights.mk/pdf/Pravnici/Regionalni%20dokumenti%20i%20mehanizmi%20za%20zastita%20na%20cov%20ekovite%20prava/Evropska%20Unija/1.%20D0%9F%D0%BE%D0%B2%D0%B5%D0%BB%D0%B1%D0%B0%20n%D0%B0%20D0%BE%D1%81%D0%BD%D0%BE%D0%B2%D0%BD%D0%B8%D1%82%D0%B5%20D0%BF%D1%80%D0%B0%D0%B2%D0%B0%20D0%BD%D0%B0%20D0%95%D0%B2%D1%80%D0%BE%D0%BF%D1%81%D0%BA%D0%B0%D1%82%D0%B0%20D1%83%D0%BD%D0%B8%D1%98%D0%B0.pdf>

²⁶ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32000L0078>

²⁷ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A12012E%2FTXT>

²⁸ https://www.base-uk.org/sites/default/files/%5Buser-raw%5D/11-06/european_disability_strategy_2010-2020_en.pdf

and the European economy, especially through the single market. Achieving this overall, as well as ensuring effective implementation of the UN Convention on the Rights of Persons with Disabilities, across the EU requires consistency. The strategy identified actions at EU level to complement national actions, and sets out the mechanisms needed to implement the UN Convention at EU level, including within the EU institutions. It also identified the support needed for funding, research, awareness raising, statistics and data collection. This Strategy focused on eliminating barriers.

8 main areas for action were identified, namely:

- Accessibility,
- Participation,
- Equality,
- Employment,
- Education and training,
- Social protection,
- Health care and
- External action.

Accessibility means that persons with disabilities have access, on an equal basis with others, to the physical environment, transportation, information and communication technologies and systems, ICT, and other facilities and services. At the time of carrying out the Strategy, there were big barriers in all areas. For example, on average in the EU, only 5% of public websites were fully compliant with web accessibility standards, although most were partially accessible. Many television broadcasters provided only a few programs with subtitles and audio support.

Accessibility is a prerequisite for participation in society and the economy, but the EU, like other parts of the world, still has a long way to go to achieve this. The European Commission proposed to use legislative and other instruments, such as standardisation, to optimize the accessibility of the built environment, transport and ICT in line with the digital agenda and innovation in the EU.

5. EU Directive 2016/2102²⁹ on accessibility to websites and mobile applications of public sector bodies, adopted on 26.10.2016. The trend towards a digital society provides users with new ways to access information and services. Information and service providers, such as public sector bodies, increasingly rely on the internet to produce, collect and provide a wide range of online information and services that are essential to the public.

According to this Directive, accessibility represents principles and techniques that should be respected when designing, constructing, maintaining and updating web pages and mobile applications, in order to make them more accessible to users, especially to people with special needs.

The purpose and scope of the Directive is to ensure that the websites and mobile applications of public sector bodies are more accessible based on common accessibility requirements. Convergence and approximation of national measures at EU level, based on agreed accessibility requirements for websites and mobile applications of public sector bodies, is necessary in order to end the fragmentation of the internal market. It would reduce uncertainty for developers and encourage interoperability. Using accessibility requirements that are technology neutral will not hinder innovation and may even stimulate it.

²⁹ https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2016.327.01.0001.01.ENG

The provisions of this Directive do not apply to websites and mobile applications of:

- Public broadcasting services and their subsidiaries, and of other bodies or their subsidiaries that fulfill the competence of a public broadcasting service;
- Non-governmental organizations, which do not provide services that are of essential importance to the public, or services that specifically refer to the needs of persons with disabilities or are intended for persons with special needs.

This Directive does not apply to the following content on websites and mobile applications:

- Office file formats, published before 23.09.2018, unless such content is required for active administrative processes relating to the tasks performed by the public sector body concerned;
- Pre-recorded media content published before 23.09.2020;
- Media content that was broadcast live;
- Online maps and mapping services, as long as the essential information is provided in an accessible digital way for maps intended for navigational use;
- Third-party content, which is neither funded, nor developed, nor under the control of the relevant public sector body;
- Reproductions of objects in heritage collections that cannot be fully accessible due to: the incompatibility of accessibility requirements with either the preservation of the object in question or the authenticity of the reproduction (eg contrast); or the unavailability of automated and economical solutions, which will easily extract the text of manuscripts or other objects in heritage collections and will transform them into content compatible with accessibility requirements;
- Content on extranets and intranets, i.e. websites, which are accessible only to a closed group of people and not to the general public as such, published before 23.09.2019, until such websites undergo a significant revision;
- The content of websites and mobile applications that qualify as archives, which means that they only contain content that is not required for active administrative processes, nor has it been updated or edited after 23.09.2019.
- Member States may exclude from the application of this Directive the websites and mobile applications of schools, kindergartens or nurseries, except for their content relating to basic online administrative functions.

The right of persons with disabilities and the elderly to participate and be integrated in the social and cultural life of the EU is inextricably linked to the provision of accessible audiovisual media services. However, that right can be better developed in the context of EU sector-specific legislation focusing on accessibility as it relates to private broadcasters in order to guarantee conditions of fair competition without undermining the public interest role they perform audiovisual media services. This Directive should therefore not apply to the websites and mobile applications of public broadcasting services.

4 principles of accessibility are:

- Noticeability of information and user interface components;
- Operability of the components of the user interface and navigation;
- Comprehensibility of information and operation of the user interface; and
- Robustness, meaning that the content must be extensive enough to be reliably interpreted by a wide variety of user agents, including assistive technologies.

6. EU Directive 2019/882 on accessibility requirements for products and services, the so-called European Accessibility Act

The purpose of the European Accessibility Act³⁰ adopted on 17.04.2019, is to contribute to the proper functioning of the internal market, by approximating the laws, regulations and administrative provisions of the member states regarding accessibility requirements for certain products and services, in particular by eliminating and preventing barriers to the free movement of certain accessible products and services, resulting from different accessibility requirements in member states. This will increase the accessibility of available products and services in the internal market and improve the availability of relevant information.

The demand for accessible products and services is high and the number of people with disabilities is predicted to increase significantly. An environment where products and services are more accessible enables a more inclusive society and facilitates independent living for people with disabilities. In this context, it should be taken into account that the prevalence of disability in the EU is higher among women than among men.

Other persons who have functional limitations, such as the elderly, pregnant women, or persons traveling with luggage, also benefit from this directive. The concept of "persons with functional limitations", as referred to in this Directive, includes persons who have any physical, intellectual or sensory impairment, age-related impairment or other reasons related to the performance of the human body, permanent or temporary, which, in interaction with various barriers, result in their reduced access to products and services, leading to a situation that requires those products and services to be adapted to their special needs.

Accessibility requirements should be introduced in a way that is least burdensome for economic operators, and for EU Member States.

Business entities will benefit from those common EU accessibility rules, which should lead to: Cost reduction; Easier cross-border trading; More market opportunities for their available products and services.

People with disabilities and the elderly will benefit from:

- **More accessible products and services on the market,**
- **More accessible products and services at more competitive prices,**
- **Fewer barriers to access to transport, education and an open labor market,**
- **Availability of multiple jobs where accessibility expertise is required**

The European Accessibility Act covers the products and services identified as most important for people with disabilities, which were likely to be regulated by different accessibility requirements across EU member states. These products and services include:

- **Computers and operating systems,**
- **ATMs, ticketing and check-in machines,**
- **Smartphones,**
- **TV equipment related to digital television services,**
- **Telephone services and related equipment**
- **Access to audio-visual media services such as broadcast television and related consumer equipment**
- **Services related to air, bus, rail and water transportation of passengers, except for urban, suburban and regional transport services, which includes: websites; services**

³⁰ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32019L0882>

based on mobile devices including mobile applications; electronic tickets and electronic ticket services; delivery of information about transportation services, including real-time travel information; and interactive self-service terminals located within the territory of the EU, except those installed as integrated parts of vehicles, aircraft, ships and rolling stock used to provide any part of such passenger transport services.

- **Banking services**
- **E-books and related software**
- **E-commerce**

3. Union of Equality³¹: Strategy for the Rights of Persons with Disabilities in the EU 2021-2030

This new EU Strategy on the rights of persons with disabilities for the period 2021-2030 was prepared by the European Commission and issued in March 2021. The EU is based on the values of equality, social justice, freedom, democracy and human rights. And the new EU Strategy reaffirms and refers to the UN Convention for the Protection of the Rights of Persons with Disabilities from 2006, and calls for its proper and more complete implementation in all member states at the national level, as well as at the level of the EU, which only confirms the value of the UN Convention as the most fundamental instrument for the protection of the rights of people with disabilities in the world.

The previous European Disability Strategy 2010-2020 paved the way for a Europe without barriers, encouraging actions supported by EU funds to make a difference to the lives of the approximately 87 million people who have some form of disability. In the EU, 24.7% of the population over 16 years of age are limited in their activities, 17.7% have moderate, and 7% have severe limitations. The evaluation shows that that Strategy has contributed to the improvement of the situation in several areas, especially accessibility for persons with disabilities and promotion of their rights, putting disability high on the EU agenda.

However, people with disabilities still face significant barriers in access to: health care, education, employment, recreational activities, as well as participation in political life. 28.4% of people with disabilities have a higher risk of poverty or social exclusion, compared to people without disabilities where that percentage is 18.4%. Over 50% of people with disabilities declared that they personally felt discriminated against in 2019.

The pandemic caused by COVID-19 and its economic consequences puts even more pressure on this issue, as it has amplified obstacles and inequalities. People with disabilities living in residential and institutional care settings experience higher rates of infection and at the same time suffer from isolation due to social distancing rules. Those living at home are affected by limited personal service delivery, which can jeopardize independent living. Limited availability of ICT tools necessary for teleconferencing, remote work arrangements, distance learning, online shopping and access to information related to COVID-19 are also a major challenge for these individuals.

The EU has taken swift action to mitigate the socio-economic consequences of the pandemic to ensure a fair and inclusive recovery, in terms of disparities and inequalities. In May 2020 The European Commission has proposed a major recovery plan for Europe. The next long-

³¹ Union of Equality: Strategy for the Rights of Persons with Disabilities 2021-2030, March 2021
Brussels, 3.3.2021 - COM(2021) 101 final

term budget of the EU, together with the Plan for the so-called The EU's Next Generation represents the largest stimulus package ever adopted, as it has secured funds amounting to €750 billion.

This Strategy aims to improve the lives of people with disabilities in the third decade of the XXI century, in the EU and beyond. The goals can only be achieved through coordinated action at both national and EU level, with strong commitment from Member States and regional and local authorities.

Therefore, it remains the primary responsibility of Member States to design their national disability policies in accordance with their obligations to implement the UN Convention and in accordance with applicable EU rules.

The strategy supports green and digital transitions and a healthy Europe, thus contributing to a sustainable, resilient, innovative and fair Union. The strategy should help achieve the EU as a Union of Equality and strengthen the role of Europe as a global partner in the fight against inequalities, the achievement of the UN Sustainable Development Goals, foreseen by the UN 2030 Agenda, as well as the promotion of human rights.

The EU strategy 2021-2030 focuses on several aspects of this problem, namely:

- **Accessibility,**
- **Enjoying EU rights,**
- **Decent quality of life and independent living,**
- **Equal access and non-discrimination,**
- **Promoting the rights of people with disabilities on a global level,**
- **Effective implementation of the Strategy,**
- **Leading by example,**
- **Awareness, management and measurement of progress, and**
- **Conclusion.**

In the following, a review will be given of the most relevant parts of the Strategy related to accessibility.

1. Accessibility, as an enabler of rights, autonomy and equality. Accessibility to built and virtual environments, to information and communication technologies-ICT, goods and services, including transport and infrastructure, is an enabler of rights and a prerequisite for the full participation of persons with disabilities on an equal basis with others. Millions of people with disabilities unfortunately experience barriers to use transportation, access facilities, and receive appropriate information. 64.3% of persons with disabilities over the age of 16 have an internet connection in their homes, in contrast to other persons without disabilities, where this percentage is 87.9%.

During the first and second decades of the 21st century, a number of EU rules were adopted in various areas to make the EU more accessible to people with disabilities, the most important of which are dealt with in the above lines of this Study. Those rules include: accessibility of products and services, accessibility of the Internet, electronic communications, audiovisual media services, copyright. European policies promote digital transformation and digital public services that are inclusive and accessible to people with disabilities.

Passenger rights guarantee the right to non-discrimination in access to transport and to receive free assistance for passengers with disabilities and reduced mobility traveling by air, rail, sea transport or buses. The Access City Award stimulates a coherent, cross-sectoral approach that goes beyond the minimum standards established by legal norms. Also, the

European Commission recommends that in the context of renovation of buildings to improve the level of energy efficiency, the removal of accessibility barriers should be ensured.

To make the EU barrier-free, Member States should include accessibility in all relevant policies and activities, and professionals should receive accessibility training.

At the EU level, great attention will be paid to the correct implementation and evaluation of all EU rules governing accessibility, and gaps and the need for further normative action will be identified. Action at the EU level will also include further work on standardization and technical specifications. The European Commission until 2023 should examine the functioning of the internal market for assistive technologies to identify the need for further action as different rules in Member States on product certification may harm price competitiveness.

A leading initiative. In 2022, the Commission will launch a European resource center to increase coherence in accessibility policies and facilitate access to relevant knowledge. This cooperation framework will bring together national authorities responsible for implementing accessibility rules with experts and professionals from all areas of accessibility, to share good practices, to inspire policy development at national and EU level, and to develop tools and standards to facilitate the implementation of EU law.

The European Commission should:

- Provide, in 2021, practical guidance to Member States to support the implementation of accessibility obligations under the Public Procurement Directives and promote training for public procurers to purchase accessible products and services;
- In 2021 to include accessibility and inclusiveness in a strengthened EU digital government strategy, focusing on user-centred digital public services, affordable across Europe, that respond to the needs and preferences of European citizens, including the needs of people with disabilities;
- In 2022, assess the application of the regulation on internet accessibility, whether it should be revised to address any identified shortcomings, such as scope, technological progress and coherence with other relevant EU legislation;
- To review, in accordance with the Strategy for Sustainable and Smart Mobility, a regulatory framework for passenger rights, including rights for persons with disabilities and reduced mobility in air, water and bus transport;
- To begin, by 2022, with a review of the assets of the railway infrastructure, that is, of the accessible parts of the railway stations, in order to identify the existing obstacles and barriers to accessibility;
- Review, in 2021, the EU guidelines for the development of the Trans-European Transport Network to strengthen accessibility provisions;
- Revise, in 2021, the urban mobility package to strengthen sustainable mobility planning, which requires Member States to adopt local mobility plans taking into account the needs of different groups, including people with disabilities.

Improving access to facilities for arts and culture, recreation, leisure, sports and tourism.

Accessible and inclusive arts and culture, sports, leisure, recreational activities and tourism are essential for full participation in society. They increase well-being and enable everyone, including people with disabilities, to develop and fulfill their potential. Accessible tourism for people with disabilities is crucial for supporting their participation in all spheres of life, as well as for the socio-economic development of countries.

- The EU will strengthen the participation of persons with disabilities in all these areas by continuing cooperation with the main sports organizations and specific sports organizations at all levels.
- It will promote and raise the visibility of artworks by persons with disabilities and strive to make cultural heritage and all art accessible and inclusive for persons with disabilities with the support of EU funding.
- The European Commission will deal with disability stereotypes, e.g. in media and film, by requiring commercial communications to respect human dignity and not involve any discrimination, including that based on disability.
- The commission will assess the accessibility of printed works for persons with disabilities.
- The Commission will start a study to evaluate the implementation of Article 30 of the UN Convention, to support member states in policies to increase the participation and support of people with disabilities in sports, culture and leisure activities.
- The Commission will partner with the International Paralympic Committee to encourage inclusion in sport and combat stereotypes.
- The development of accessible tourism, especially in cities, will be further promoted through the European Capital of Smart Tourism award.
- Member States are urged to promote and encourage the art of people with disabilities and to raise awareness that makes them visible through exhibitions and performances, and to make more art collections and museums accessible to people with disabilities.

5. Promoting the rights of persons with disabilities globally. The EU will continue to support the human rights of persons with disabilities and support their social inclusion in all international relations, as part of all external activities, policy planning, programs and funding activities. Attention must also be paid to children and young people with disabilities, especially in conflict and post-conflict societies or developing countries, where protection, access to school and basic services are often lacking. This implies paying particular attention to engagement with third countries within the framework of the EU's enlargement and neighborhood policies and its broader development cooperation agenda.

With this Strategy, the EU will strengthen its role at the global level as an advocate for the rights of persons with disabilities through cooperation, humanitarian action and dialogue with the international community of countries that have acceded to the UN Convention on the Rights of Persons with Disabilities. The EU will also continue to deliver humanitarian aid and protection in accordance with humanitarian principles. The EU calls on all states to respect, protect and fulfill the rights of persons with disabilities, and this will be reflected in all political initiatives that will shape the third decade of the XXI century.

It is essential that external action respects and implements the principles of the UN Convention, together with the UN 2030 Agenda, including the so-called approach. universal design for better accessibility and provision of reasonable accommodation for persons with disabilities in all activities. The EU will do this using all its tools, starting from political, human rights and trade dialogues, to cooperation with third countries in the EU's neighbourhood, enlargement and international partnership, policies that include humanitarian actions and aid, as well as cooperation with multinational organizations.

It can be concluded that with this Strategy, the EU aims to ensure further significant improvements in all areas of the lives of people with disabilities in the EU and beyond. During the third decade of the 21st century, this Strategy will support both Member States and EU institutions in their efforts to implement the UN Convention. The implementation of the initiatives foreseen in the strategy will contribute to the reduction of discrimination, inequalities and support for persons with disabilities, for the full enjoyment of their basic human freedoms and rights, as well as the rights of the EU, on an equal basis with others by 2030, for to maximize their independence, participation and decent life.

The objectives of this Strategy will need to be achieved through a strong commitment by Member States, by promoting policies and actions that will bring about accessible environments, inclusive education systems, as well as high quality health care systems, and effective pathways to fair employment for people with a disability.

Ensuring that persons with disabilities fully participate and contribute to the transition to an inclusive, green and digital economy and society, as well as to democracy, will affirm the EU values contained in many EU acts, and make a strong contribution to the EU for equality, and will strengthen the rights of people with disabilities globally.

The Commission invites the European Parliament and the Council to work together and lead by example in achieving the implementation of the UN Convention, both at EU and national level.

3. International accessibility standards

Standardization plays a major role in the recognition of the rights of persons with disabilities, and through their unification and standardization helps to establish equal treatment in global frameworks. The standards, of course, arise from practice, but they include a multitude of technical characteristics and norms of natural laws, which must be met during the design, construction, as well as the use of various facilities and services by persons with disabilities.

For the purposes of this Study, the following standards will be considered in this section:

1. *ISO 14785:2014* Tourist information offices — Tourist information and reception services — Requirements³²
2. *ISO 13009:2015* Tourism and related services — Requirements and recommendations for beach work³³
3. *ISO 17049:2013* Accessible design — Application of braille to signs, equipment and appliances³⁴
4. *ISO 23599:2019* Assistive products for the blind and visually impaired - Indicators for tactile walking surfaces³⁵
5. *ISO 21902:2021* Tourism and related services — Accessible tourism for all — Requirements and recommendations³⁶

³² <https://www.iso.org/standard/55038.html>

³³ <https://www.iso.org/standard/52329.html>

³⁴ <https://www.iso.org/standard/58086.html>

³⁵ <https://www.iso.org/standard/76106.html>

³⁶ <https://www.iso.org/standard/72126.html>

3.1. ISO 14785:2014 Tourist Information Offices — Tourist Information and Reception Services — Requirements

The most logical thing when traveling is that when we go to a new destination, as an unwritten rule, the first thing to look for is always the tourist information office, desk, or center, in order to make a plan of where, what and how to visits.

The international standard, *ISO 14785:2014* Tourist information offices — Tourist information and reception services — Requirements, establishes minimum quality requirements for the services provided by tourist information offices, of any type and size, regardless of whether they operate under public or private management, and in order to meet the expectations of the visitors. Many tourist information offices are managed by the public administration. There are also those that are managed by private entities, but they ideally work in partnership with the relevant tourism authorities. Through this standard, the goal is to help make such offices more accessible to everyone, taking into account things like e.g. entrance and accessibility through the door, parking, as well as the ability to access the information they distribute, taking into account voice, visual and other capabilities. Tourist offices should aim to help people with disabilities get the most out of their visit by providing a list of the best accessible hotels, activities and adapted transport.

The standard *ISO 14785:2014* Tourist information offices — Tourist information and reception services — Requirements, also contributes to the achievement of the Sustainable Development Goals foreseen by the 2030 Agenda of the UN, specifically goal 12, which is the provision of sustainable models of consumption and production.

This standard uses the terms tourist information office and visitor.

A tourist information office or tourist information center is responsible for receiving and advising visitors, as well as promoting activities related to tourism in a given destination, through brochures, leaflets and also through various types of electronic means.

The visitor is a client who contacts the tourist office, personally or with other means.

Regarding the location and access of the Tourist Information Offices, the most suitable location of the facilities and types of services are determined according to the characteristics of the destination and the requirements of the visitors, and they should be located where there is the greatest flow of tourists, which means the center of the city, the tourist spots, the arrival terminals through the different types of transport, as well as the main access roads to the destination. It is important that the office can be easily found, and of course free access should be provided for all persons, including persons with special needs. The office should be identified by visible signs or banners, placed on or in front of the building, in accordance with local regulations, and should also have direct road signs for motorists, cyclists and pedestrians. Maps and brochures, which are published by the offices, should indicate the location, designate information about parking spaces.

Regarding the opening hours, this should be defined, according to the number of visitors, tourist activities and seasons, and it should be available in as many places as possible to know, but emergency contacts should also be designated, clearly visible from the outside for visitors. A local map, a list of accommodation facilities with telephone numbers, should be visible from the outside, as well as an indication of where this list can be obtained, if possible. An automated telephone message left for response should be in at least two languages, local and one international, and it will inform visitors of the website's opening hours and address.

In terms of contact, the Office should establish rules for the ethics of the behavior of the staff, who should be professional, provide an efficient service and show that they are available. That hospitality should be present from the very beginning of the conversation in a friendly and polite tone; to be patient; to prioritize visitors over administrative work or any other task; to clarify visitors' questions in order to ensure a satisfactory answer. The staff should be easily recognizable, whether through appropriate uniform clothing or through appropriate marking, whether badges, hats, or similar recognizable objects unified for the given destination. The local language and at least one international language is used most often in the offices, depending on the estimates of the visitors. The more languages the information is available, the better it is for the center itself, for the visitors, and for the destination itself. Staff are expected to communicate with visitors in the language chosen by the visitor, if possible.

Regarding the provision of information to visitors, it should be accurate and regularly updated, be available on a wide range of topics, and only consider tourism entities that provide products and services that meet the relevant legal and regulatory requirements.

Information should relate to accommodation, travel agencies, food, transport, cycle routes, shopping, local products and crafts, walks, cultural activities, holidays, heritage, sporting activities, outdoor activities, banks, currency exchange, chambers of commerce, local customs, religion and places of worship, libraries, medical services, police and post offices, real estate agencies, local and regional attractions and weather forecasts. They should contain general and specific information about the destination and tourist attractions, with the necessary details of the visit: location, description, characteristics, conditions and working hours, taking into account the interests of children and the needs of persons with disabilities. Information about health services, security should also be available in order to avoid risks for visitors, adequate information about drinking water, tides, the presence of poisonous plants and other local hazards that may be encountered should be provided.

Nationally relevant tourist information should be provided, or indicate how to obtain it. It is good to offer information in several forms, trying to avoid unnecessary printing.

Visitors should ensure their specific requirements, e.g. diet, accessibility, medical care, allergies, to be fulfilled before deciding to travel. It is good to know and learn as much as possible about the destination, and its customs, norms and traditions. Behavior that may offend the local population should be avoided. Tourists must be aware of the laws so that they do not commit any criminal offense according to the law of the country to be visited. Tourists should refrain from any trade in illegal drugs, weapons, antiquities, protected species and products or substances that are dangerous or prohibited by national regulations.

Tourist office staff should have access to information on: local service telephone directories and emergency contact information; transport information, arrivals and departures and timetables in the various modes of transport in the destination; destination maps; contacts with tourist guides; information on the size of distances and the time required for travel; accommodation information; newspapers and magazines; updated tourist information guides and websites; dictionaries of the most common languages used by visitors.

Tourist offices should establish a regular dialogue with all service providers in the destination, and keep appropriate records for public and private tourism service providers, and update the information at least once a year, and for those offices that operate throughout

the year, at least twice a year. The offices also maintain calendars of events taking place at the destination and surrounding areas.

Tourist info centers can also provide **commercial activities**, through an appropriate procedure, which is in accordance with the appropriate legal requirements for such activities. Before providing any service, offices must clarify which services are to be paid for. They can provide services for:

- Reservation and sale of services;
- Purchase of entertainment services;
- Sale of local products, handicrafts and souvenirs, food and drinks, publications or other requested products;
- Provision of basic services, such as: internet, currency exchange, transport tickets, public telephones, mail, SIM cards;
- Assistance with legal or health services;
- Guided tours and bicycle rental.

In terms of infrastructure, facilities and equipment, Tourist Offices should comply with the relevant legal requirements for accessibility and safety. They should know the accessibility limits of their facilities and inform visitors accordingly.

Facilities should meet all requirements set out in existing legislation for emergency systems and fire precautions. Equipment and facilities will be adapted to the needs of visitors and staff. Premises, equipment and related facilities, heating and cooling systems, should be kept clean and serviced according to a defined schedule. Offices should have a periodic maintenance plan for IT equipment and programs, including updates and renewals.

The offices use **IT equipment**, which enables telephone communications, Internet access, e-mail, a system for compiling and portability of documents, autonomous information systems and content compatible for mobile applications. Such technologies may include: DVD, CD, USB, touch screens, QR code or BIDI code.

What is very significant for this Study is **Annex D** of this standard, which deals with **Accessibility**.

According to the recommendations, **priority should be given to groups with special needs**, such as: pregnant women, parents with small children, the elderly and people with special needs.

Offices should be accessible to persons with disabilities and those with special needs. Aspects related to movement access should be taken into account: entrance, parking and suitable barrier-free accessible rooms. Adequate accessibility must also be provided for hearing and sight-related problems, e.g. large print or Braille.

Access entrances should have no architectural or natural restrictions and should avoid obstacles to movement circulation. Doors should contrast with the surrounding walls and should be wide enough to allow comfortable wheelchair circulation. Special attention should be paid to adequate access lighting, design, contrast and access signage. **Access signs** should be located near the main access and they should be clear, visible, concise and not an obstacle to free circulation.

Tourist offices should have **accessible documents** with the possibility of self-service, as well as with easy-to-understand road signs and directions.

3.2. ISO 13009:2015 Tourism and Related Services — Requirements and Recommendations for Beach Work

Before the adoption of this standard in 2015, there were no specific beach management standards and guidelines to help operators determine and plan beach management. As a result, many beaches have not been developed or managed in a sustainable manner, resulting in a certain loss of the natural beauty of the site, and with it the negative experience of beach users. The examples with the Ohrid and Prespa Lake beaches, unfortunately, represent such negative examples of how adequate sustainability and high environmental standards are not ensured, but there must be hope that in the coming period it will be improved. The concept of Beaches for All means that it is important that beach operators consider the needs of those for whom access to such places may be a challenge.

ISO 13009:2015, Tourism and related services — Requirements and recommendations for beach work, emphasizes **the importance of making beaches accessible to all**. Briefly, that standard **outlines recommendations for beach accessibility**, such as the design of accessible ramps and walkways, as well as site facilities, including restrooms, showers, and drinking fountains.

The objectives of this standard are to provide **guidance to help establish international benchmarks for beach management and safety, and to assist beach operators to make better informed beach management decisions**. It also includes: beach safety education and information, signage, access and zoning, surveillance and rescue, water quality and beach facilities.

Each beach is unique and has its own characteristics. A certain beach may be defined as a low activity beach for most of the year, but be classified as a high activity beach for two weeks of the year, e.g. during peak season or periods of some events, thus requiring a different management approach. This standard applies to both high and low activity beaches.

The purpose of the standard is to establish a comprehensive risk management process that highlights the risks and hazards present at each beach and identifies the appropriate control measures needed to reduce the likelihood of the risk occurring. The type of beach is also determined from the risk assessment, i.e. whether it is a beach with high or low activity.

The ISO 13009 standard is in accordance with the development of 4 Strategic Goals for sustainable development defined in **the 2030 Agenda** of the UN. And that, for the purposes with no. **8,11,14 and 15**, that is:

8. The promotion of sustainable, inclusive and sustained economic growth, full and productive employment and decent work for all;

11. To make cities and human settlements inclusive, safe, resilient and sustainable;

14. Preservation and sustainable use of oceans, seas and marine resources for sustainable development;

15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainable forest management, combat desertification and halt land degradation and halt biodiversity loss.

The scope of this international standard establishes **general requirements and recommendations for beach operators offering services to tourists and visitors**. It provides guidance to both operators and users on sustainable beach management and planning, sustainable infrastructure and service provision needs, including beach safety, information and communication, cleaning and waste disposal. This international standard applies to beaches during the season when they are visited by tourists, depending on the geographical

location of the destination and the time of year. This standard uses elements of previously established standards that are compatible and related to beaches, namely: ISO 7001:2007, Graphic symbols — Symbols for public information; ISO 20712-1:2008, Water safety signs and beach safety flags - Part 1: Specifications for water safety signs used in workplaces and public areas; ISO 20712-2:2007, Water safety signs and beach safety flags - Part 2: Specifications for beach safety flags - Colour, shape, meaning and performance; and ISO 20712-3:2020, Water safety signs and beach safety flags - Part 3: Guidance for use.

For the purposes of this standard, several terms and definitions are used, namely: an accessible beach, which meets a number of requirements that make it safe for use by people with specific needs. Then: bathing season; beach; beach operator; collection capacity; emergency services controller; environment; First aid; beach with high activity; beach with little activity; organization; rescue service; service; supplier; an observation tower or observation point; user.

General requirements and guidelines for beach management. Coasts around the world face increasing demands to cater for a wide range of recreational activities, with millions of tourists visiting coastal areas each year. Tourism is the third largest industry in the world and the primary economic sector in many regions. As a result, there is increased competition for the use of resources in coastal waters and beach areas. The activities on the beaches are becoming more diverse, starting with boating, scooters, swimming, sailing, sailing, horse riding, tasting barbecue on the beach, etc. Many of such activities, especially those involving more active participation, require some form of governance to reduce potential conflict between different user groups. Not only do conflicts between different users need to be resolved, but differences between local people and tourists need to be taken into account.

Beaches can have multiple uses, including:

- **Recreation and free time;**
- **Coastal protection;**
- **Educational, socio-cultural, religious or sports activities and events;**
- **Preservation of nature;**
- **Fishing and shell collecting;**
- **Military activities.**

Safety and security are increasingly important issues in the world, and beach operators and local authorities are paying more attention to the physical safety of individuals and the protection of the natural environment. It is not possible to have easy access to every beach, but all beaches should be as accessible as possible. Where practicable, all beach equipment and facilities should be accessible to all users, including people with specific needs, e.g. by providing adequate parking, sanitary services, first aid services, bars and restaurants, and practical information at the very entrance to the beach.

In addition to building regulations, examples of good practice are a recommended way of helping designers to manage beaches appropriately for specific recreational needs.

The beach operator should develop a **code of practice**, which may include recommendations and guidelines for:

- Designing access to the beach;
- Construction and design of beach facilities as well as comfort services;
- Development control of the beach from the back;

- Protection of the beach;
- Establishment and regulation of beach zones;
- Installation, maintenance and management of public rescue equipment and facilities;
- Information on beach safety;
- Efficient management and maintenance of the beach.

In accordance with the defined scope, a **work plan and organization of the beach** should be established. It should include at a minimum the following:

- Definition of the different bathing and non-bathing seasons;
- Use and organization of the beach in different seasons, with an emphasis on the bathing season;
- Use and organization of the bathing area, e.g. buoys, motorboats and floating platforms;
- Identification, use and organization of access points;
- National and local regulations, which define the possible uses and conditions in which an activity of the type will be carried out, e.g. prohibitions, various signs, bars, outdoor eating places;
- Zonal studies for tourist use and the capacity of the beach

The beach operator should have a **maintenance and monitoring plan** that should:

- Include all beach installations and equipment, whether mobile or fixed, and to ensure that they are in good condition for their purpose;
- Foresee their adjustment to the expectations of the users;
- Include methods and periods of maintenance, daily, weekly, monthly and yearly, and the process of verification of those performed operations.

Communication with stakeholders. The beach operator determines a responsible person for communication, who will establish the necessary communication channels, in order to:

- Provide information about the services offered to users;
- Informs competent authorities and users about possible emergency situations;
- Responds to complaints, suggestions and consultations from users;
- Provide information on limitations related to legislation that may affect the user;
- Provide information on water quality and provide information on the environment.

The beach operator should be aware of the applicable national building and coastal regulation, as well as respect the minimum requirements for services and infrastructure according to this standard.

Permanent infrastructure. According to the standard these sanitary services should be available: Toilets, Showers and places to wash feet. At the same time, any waste water from the toilet facilities should be treated separately and should not be discharged into the bathing area. All sanitary services that exist on the beach should be available to users during the working hours of the beach. If the beach is adapted for accessibility, it should have sanitary services adapted for people with special needs.

Sanitary services should be marked and marked on the main accesses to the beach, and on the map the design of the sanitary services should correspond to the natural or urban environment in which they are located. All installations and equipment provided for sanitary services should be included in the beach cleaning and maintenance plan.

Toilets. In accordance with the capacity of the beach, the operator should define a sufficient number of toilets to cover the demand of the users, which should have appropriate equipment, namely:

- Toilet;
- Hard non-slip floor;
- Trash can with lid;
- Toilet paper;
- Coat hanger or hook;
- Natural or artificial ventilation;
- Sinks for hygienic washing, and if that is not possible, to have liquid for disinfection.
- If the beach is accessible for people with special needs, it should have at least 1 toilet adapted for such people.

Showers and foot washing facilities. There should be fresh water showers on the beach unless there are legal provisions to the contrary, or water resources are scarce in the city or region to which the beach belongs, and in both such cases described above, there should be places to wash the feet.

The water flow in the showers should be adequate. In accordance with the capacity of the beach, there should be a sufficient number of showers and places to wash feet, which will satisfy the demand for it. Shower and foot washing cubicles should have suitable devices, where possible, for saving water and for supplying waste water.

When using the showers and washing feet, these prohibitions and recommendations should be displayed: regarding the appropriate use of soap, the wasteful use of water, as well as the prohibition of consuming water that is not potable. If the showers and foot washes are located on platforms, this surface should be above the sand to allow water to run off, and it should be clean and kept free of various fungi. If the showers are installed directly on sand, the growth of vegetation in the sand around the showers should be controlled.

If the beach is accessible for people with disabilities, it should have showers or places to wash feet adapted for this category of people.

Lockers and changing cabins. If there are cabins for changing clothes on the beaches, they should have: a non-slip floor, clothes hooks; natural or artificial ventilation, as well as chairs or benches.

The temporary infrastructure includes, among other things, adequate conditions to have a suitable form of shade on the beach, which will be to protect the users of the beach from the sun. Where possible, and preferred by both tourists and locals alike, such shade is best emanated from the natural terrain.

Beach infrastructure may include:

- **Sunbeds;**
- **Toilets,**
- **Showers and**
- **Surveillance towers.**

They should be well integrated into the natural and built environment and meet appropriate environmental and aesthetic criteria. That infrastructure needs to be regularly maintained and inspected to ensure that it is safe to use. The operator should check: the cleanliness and serviceability of the equipment; the environmental effects of paint and other materials used to maintain equipment and infrastructure, as well as any potential risk associated with

equipment deterioration and malfunction. Whenever possible, environmentally friendly products should be used.

Access to the beach. The beach operator should plan each vehicle's access to the beach and develop a method to ensure that the accesses are maintained in a suitable condition for use. The operator shall designate a person tasked with ensuring that access points and areas are maintained at the appropriate level of quality defined by this standard. Namely:

- All beaches should be accessible as much as possible;
- If the beach is categorized as public, it should be publicly announced by the operator. In that case access to public beaches should be free, although some beaches may be provided with public access by charging a small and reasonable price for it;
- The access paths to the beach should be safe, clean and maintained at all times;
- Most of the beach should be designated completely vehicle-free. No vehicles should be allowed except those used for cleaning, security, and emergency vehicles. The beach operator should plan vehicle access to the beach parking lot.

General requirements regarding accessibility. Access to the beach should be facilitated by accessible ramps, adapted for users with special needs. If possible, access to water should also be facilitated. If the beach is accessible for persons with special needs, it should provide access to the dry surface, to the bathing area and to all existing installations and equipment adapted for such persons. Where locally permitted, entrances to accessible beaches should be clearly marked and display the graphic accessibility symbol.

Parking lot. On those beaches where there is parking, it should be maintained in proper working conditions and well guarded. Parking lots should have designated places for people with special needs.

Unauthorized camping, driving and littering on the beach is prohibited, and there should be appropriate information displayed on the beach. Vehicles should not be allowed on the beach, except those used for cleaning and safety, eg to move rescue equipment or for emergencies. For cases where vehicles cannot be completely banned, their use should be properly justified and used correctly. Driving and parking areas should be designated, as well as car-free zones, and whenever the situation calls for it, the police or security should control the beach. Most of the beach should be designed for full vehicle-free use.

Provision of services. Information services. Information about the services provided at the beach should be given to all users. The beach operator will appoint a person who has the duty to ensure that the user is adequately informed about all matters related to their safe and enjoyable use of the beach and its facilities and that of the beach operator, codes of conduct, safety, as well as sanitary, medical and environmental issues.

The information is provided on information boards, tourist information, flags or any other. an asset that can be understood by the beach user. The operator announces the duration of the bathing season, clearly indicating when the period of high activity is expected, i.e. the maximum presence of users. He is obliged to define and inform the users about the minimum service offered during the bathing season and outside of it, specifying the schedule.

The beach operator should unify the style and design of all signs. **The information provided in the map** should include at least the following:

- Location of access points, including those for people with special needs;
- Location of the various services provided;

- Seasonal dates and hours for using the services;
- Code of conduct for the beach;
- Security information;
- Sanitary and environmental information;
- Location of toilets.

Tourist information. The beach should have an information point that displays tourist information about the local area, and the wider environment that may be of benefit and interest to the beach user. Users should be warned in advance of any events that are planned in the beach area. It can be done in the form of posters or other information on the beach, through announcements in local media, or on the websites of local authorities or beach operators.

Tariffs and charges. The local authority or beach operator should consider collecting a fee from the organizers of events that are organized in the beach area, and this income should be used to improve the beach or the local area.

Safety information. At the main access points to the beach there should be information boards, including information about the lifeguard services on the beach and recommendations for the health of users and as a minimum:

- Map or plan of the beach;
- The boundaries of the supervised bathing area;
- Flags and their meaning;
- Location of security, surveillance and rescue services;
- Methods of contacting the controller of emergency services;
- Seasonal dates and hours for use of rescue services;
- Location of first aid service and emergency phone number.

The beach operator should establish a **procedure for coordination and response for lost and found persons**, according to the appropriate recommendations of Annex E of this standard. It is likely that lifeguards and other beach personnel will need to know how to handle lost and found accidents.

A "missing person" situation occurs when: a family member, friend or guardian approaches a lifeguard or other beach staff and reports a missing person; one person has been identified as missing as a result of a water incident.

A "found person" situation occurs when: a lifeguard or other beach staff is approached by a user who has lost their group; a lifeguard or other beach staff encounters someone who appears distressed and lost; the user finds a child or a person and hands them over to a lifeguard or other staff on the beach.

Procedure. Lifeguards or beach personnel should immediately contact the appropriate external authorities in the following situations if:

- There is concern that the person was last seen in, or near, water if they were paddling;
- The missing person has special medical needs;
- There is a reasonable suspicion or evidence that the person may have criminal activity;
- There is some circumstance that suggests the person may be at immediate risk.

Although there is a high degree of anxiety when it comes to searching for missing children, incidents of lost children on beaches that have had a negative outcome are extremely low.

Research shows that most children walk in one direction. In general, the search area should expand by 1,000 m in each direction for every 15 minutes after the child goes missing. However, if there is an early report of missing children, they are usually found within a relatively short time.

Missing persons in the coastal environment are reported to the appropriate authorities, and they should request the following information:

- Rescuer data, name, phone number, location;
- Name of missing person or persons, address, telephone number, vehicle registration, if any;
- Date, time and location when the person was last seen;
- Description of the missing person, gender, age, clothing, footwear, physical and mental condition, medications, whether they are accompanied by a dog, etc.;
- Known intentions or probable actions of the missing persons, whether they have friends or relatives in the locality;
- The weather conditions at the place of the event;
- Knowledge of the area, as well as the experience in open space of the missing person;
- Actions already taken, and police informed;
- Other relevant information based on the given facts.

Preventive measures. Many beach operators have designed and implemented successful missing child schemes to help reduce the chances of a child becoming lost or to help speed up the location of a child once they have gone missing. Such measures include:

- Bracelets for giving information, e.g. a phone number in case the child goes missing, or information about the parent, to help rescuers or staff locate them if their child is found;
- Unique features of certain points along the beach, eg. cartoon characters, which will help inform children about which part of the beach they should stay in if they get lost;
- Clear points to find, eg. the lifeguard towers.

Methods should be provided to inform beach users about safety aspects related to the beach. Public education campaigns conducted before the main holiday or swimming season can be an invaluable way to educate users and raise awareness of the dangers present on beaches. Also useful are: information at the point of entry; tourist publications; safety campaigns, e.g. talks, posters, leaflets, prize projects, role play led by life saving organisations, swimming courses; information printed on maps, e.g. an explanation of the beach flag system; advertisements in newspapers or local bulletins.

The beach operator shall designate a person or persons who will be responsible for ensuring that the quality of services is maintained, monitored and reviewed in relation to beach safety provisions.

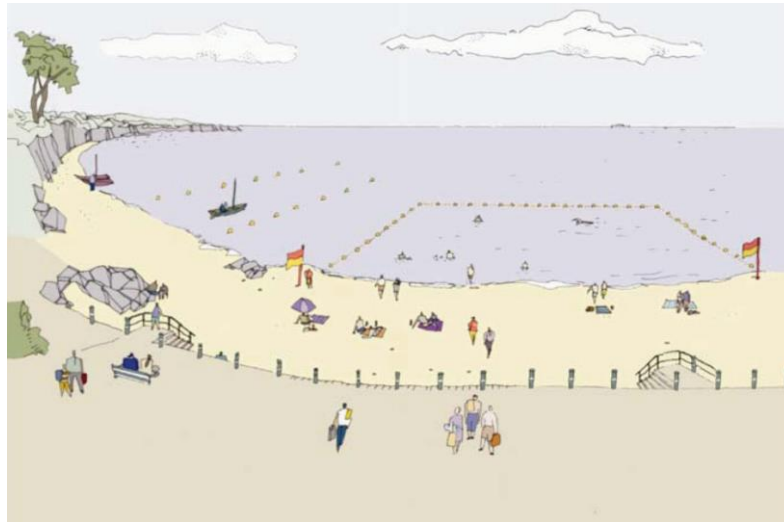
In the interest of swimmers' safety, certain areas within **the beach should be zoned** for swimming. The size of the swimming area should be at least 100 m wide and extend out of the water at least 50 m.

If an area has been identified as suitable for the departure and return of vessels to shore, then this area should be marked. The lane marked with buoys should be located within 100 m of the shore and should be at least 30 m wide to allow vessels to use the buoy lane safely.

The floats should be spaced no more than 2 m apart. The floats should be attached with a floating line and painted **yellow**. The flotation system should be secured to the bottom of the

water and free from entanglement. Figure 1 shows an example of a marked swimming area and boating channel.

Figure 1. Example of a marked swimming area and boating channel



Rescuers. Water lifeguard services are provided by appropriately trained personnel and sufficient rescue resources, as identified through the risk assessment. The team should provide an immediate response from the moment the incident is reported to rescue in less than 4 min.

At least these services should be provided:

- Duties for supervision, rescue and assistance of persons in difficulty;
- Proactive approach to ensure the safety of swimmers/beach users, in order to prevent accidents and incidents on the beach;
- Management of the application of the identified security measures;
- Monitoring and ensuring effective management of all conflicts between beach and water users;
- Monitoring and ensuring compliance with local laws and reporting to the appropriate competent authorities if there is a need for it;
- Keeping the areas designated for bathing free from activities that could be dangerous to those who use them;
- Management of any type of activity that may endanger users.

The minimum staff present on the beach should be: service coordinator, who can be together with other beaches and duties; and lifeguards in accordance with the risk assessment, in which case they should not undertake other duties.

Where permitted by regulation, **minimum beach equipment**, subject to appropriate risk assessment, should include:

- **Red** and **yellow** flags to identify each surveillance point or other designated observation areas;
- First aid equipment;
- Communication equipment;
- Rescue equipment, binoculars, back board, whistles, and other appropriate tools;
- Watchtowers located at appropriate distances, linked by radio, mobile phone or equivalent electronic means with the lifeboat and service personnel;

- Sufficient number of rescuers to be able to provide adequate response time, if there is an opportunity they can be shared with other beaches.

The equipment should be easy for people to use and without compromising the safety of the rescuer. For beaches where public lifesaving equipment is identified as an appropriate control measure, the following equipment should be considered:

- On a shallow beach, a life-saving ring with dimensions of 46-61 cm;
- On a beach with medium and greater depth: a life-saving ring with dimensions of 46–61 cm;
- In an area of the beach with fast-moving water, where there is a river entrance: throwing a rope with a float;
- In rocks and rocky areas: life-saving ring with dimensions of 46-61 cm;
- In man-made areas - harbor walls, bollards: 61–91 cm life-saving ring.

Public rescue equipment should be: clearly positioned and in **red**, **orange** or **red** color at an optimal height for access; located at appropriately determined distances; to check the correctness regularly during the year, with recorded inspections, and to replace where necessary.

Annex C of the standard normatively refers to the Verification of the list of minimum requirements for services and infrastructure.

The minimum infrastructure requirements are:

- Buildings and temporary infrastructures on the beach should be well integrated into the natural and urban environment in which they are located and meet ecological and aesthetic criteria;
- Sanitary services include toilets, showers and foot washing facilities;
- There should be a sufficient number of sanitary installations to cover the demand of users in accordance with the capacity of the beach;
- Any waste water from the toilets should be treated separately and should not be discharged into the bathing area or other. any water that supplies the water main;
- There should be a sufficient number of first aid stations to ensure that users receive adequate medical assistance;
- Access points should be clearly marked and access paths to the beach should be safe.
- There must be some form of shade on the beach;
- Containers or waste collection bins should be placed on sand;
- All installations, equipment and access should be kept in good condition for use, clean and well maintained.

The minimum service requirements are:

- All personnel providing sanitary services, beach safety services, leisure services and maintenance services and who are in contact with beach users should have: appropriate qualification, sufficient material means for the correct performance of activities, uniformed and easily recognizable, be polite and attentive to customers.
- The information provided to the user should include a map and useful information on the main access points to the beach. Information should be complete, periodically updated and available in official local languages and at least one foreign language, including: location of access points, including those for people with special needs; location of the various services provided, toilets and use of the bathing area;

- Information for the beach operator: period of the bathing season; service offered during the bathing season and outside it; a schedule for using the services and any applicable tariffs for each service for which payment is required; advance warning of any events or activities planned for the beach area and its duration; motions and procedures for complaints and appeals; indicators of services and obligations undertaken by the beach operator; the set goals for the current period and the results of their achievement in the previous period;
- Legislation and regulation that may affect the user; Codes of conduct for beach users, communication using graphic symbols; safety information, including emergency situations; results of indicators of relevant health and safety risks; indicator results on environmental issues, including water quality.
- An established system of indicators that provides relevant information regarding the evolution, the impacts on the environment, the health and comfort of users and the level of quality of the services provided.
- Existence of a system for responding to complaints and suggestions submitted by users, as well as instructions for their resolution and identification of the responsible person.

For free time services, at least:

- The beach should have an appropriate type of service for creating shade;
- To have the necessary mechanisms to prevent sports and recreational activities from disturbing other users of the beach.
- Food and beverage vendors should maintain high standards of hygiene.

Security and safety services:

- Necessary security cover will be provided to users, in accordance with the risk assessment, by a security service coordinator, rescuers and appropriate qualified personnel to provide medical assistance at each first aid point.
- The beach operator shall update the identification of direct or indirect health risks annually, maintain a documented procedure and establish an emergency plan for emergency situations.
- Rescue services should ensure an immediate response time.
- Safety flags are used on beaches where lifeguards work.
- Public lifesaving equipment should be suitable for the characteristics and conditions of the coast and water.
- There is a procedure for coordinating and responding to lost and found persons.
- There is a daily record of the activities undertaken within the security services.

Cleaning and maintenance services:

- The removal of waste from the water and the collection of waste from the sand, the cleaning of all installations and equipment on the beach and activities to ensure the necessary levels of cleanliness after special events and other unusual situations, should be in accordance with the plan for cleaning and selective collection of waste.
- Cleaning and maintenance of installations and equipment includes those provided in sanitary services, waste bins and containers, access to sand and water, infrastructure for security and customer care, as well as other recreational equipment and

installations, in such a way as to ensure that they are in good working order and are always clean and well maintained.

- An effective communication mechanism will ensure that any anomalies detected by beach users or any person involved in the provision of services will lead to the implementation of a process to repair or replace the necessary element.
- The maintenance service will include preventive and corrective actions, monitored and provided in accordance with a maintenance and cleaning plan, ensuring that corrective maintenance is posted and marked, offering users alternative uses during high activity.
- Keeping records of the checks performed during the cleaning and selective collection of waste.

3.3. ISO 17049:2013 Accessible Design — Applying Braille to Signs, Equipment, and Appliances

For blind and visually impaired travelers alike, the universally known and useful Braille is an essential part of life, wherever they are. In accordance with the commitment that tourism should be for all senses, a standard has been developed for the use of Braille.

ISO 17049:2013, Accessible design — The use of braille in signs, equipment and appliances is a standard that provides requirements for the use of Braille as a universal tool worldwide, enabling visually impaired passengers to access information wherever they are.

The scope of this International Standard specifies **the basic requirements for Braille used on signs, equipment and appliances, including the dimensional parameters of the Braille and the characteristics of the materials used, as well as guidelines for practical implementation.**

This standard is in line with 2 sustainable development goals from the UN 2030 Agenda, goal 10 and 11, ie: Reduce inequality within and between countries, and Make cities and human settlements inclusive, safe, resilient and sustainable.

3.4. ISO 23599:2019 Assistive Products for the Blind and Visually Impaired - Indicators for Tactile Walking Surfaces

Along with the previous standard, this standard is aimed at improving the conditions for the blind and visually impaired.

The ISO 23599:2019 standard, Assistive products for the blind and visually impaired - Indicators for tactile walking surfaces, helps such people to adopt new paths much more easily and safely.

This standard provides **product specifications for tactile walking surface indicators and recommendations for their installation in order to assist in the safer and independent mobility of the blind or visually impaired.**

This document **specifies 2 types of tactile indicators on the walking surface:**

- **Warning models and**
- **Direction models.**

Both types of models can be used indoors and outdoors throughout the built environment, where there are insufficient wayfinding signs or specific hazards.

Some countries have adopted other designs of tactile walking surface indicators based on the consolidated findings of science, technology and experience, ensuring that they can be more

easily detected and distinguished by most users. It is important that this standard is not intended to replace the requirements and recommendations contained in such national standards, regulations or guidelines, but to provide assistance and some uniformity.

This standard is correlated with 6 sustainable development goals from the UN Agenda 2030, namely:

1. To end poverty in all its forms everywhere;
3. To ensure healthy living and promote well-being for all at all ages;
8. Promoting sustainable, inclusive and sustained economic growth, full and productive employment and decent work for all;
9. Building resilient infrastructure, promoting inclusive and sustainable industrialization and fostering innovation;
10. Reducing inequality within and between countries;
11. Making cities and human settlements inclusive, safe, resilient and sustainable.

3.5. ISO 21902:2021 Tourism and Related Services — Accessible Tourism for All — Requirements and Recommendations

Tourism is one of the fastest growing sectors of the global economy. Over 1.5 billion people travel around the world, and the tourism sector employs 1 in every 11 jobs, that is, 9% of the total number of employees worldwide. However, travel can be a challenging process throughout the tourism supply chain, as mentioned above, for the 15% of the world's population who live with some form of disability and have appropriate access requirements. Improving accessibility in the tourism sector will equally benefit older people, especially considering that the participation³⁷ of people aged 65 and over is predicted to increase by 9% in 2019 to 16% in 2050.

Persons with disabilities may face physical, sensory, cognitive and cultural barriers in the tourism sector. It is difficult to find clear and accurate information about the availability of the offer, service or destination. That is why there should be consistently applied standards and better training of tourism professionals.

The public sector has a responsibility to promote universally accessible tourism environments and services for citizens and visitors. This can be achieved by establishing procedures to require accessibility for every project that receives public funding. It is estimated that public procurement accounts for between 15% and 20% of global GDP. Thus, public authorities can demonstrate leadership in tourism development by requiring universal design in public procurement tenders and in awarding contracts for infrastructure, buildings, transport and equipment. In this way – where public investment is directed towards tourism development – planners, designers, producers and tourism suppliers will be encouraged to create accessible tourism environments and destinations, benefiting visitors, businesses and local communities.

There is still relatively little supply of accessible services in the tourism supply chain worldwide, while the demand for such services is growing. Most, if not all, tour operators want to make their experience enjoyable and accessible for all customers.

It is very important to ensure accessibility at every step, at every stage of the journey!

ISO 21902:2021, Tourism and related services — Accessible tourism for all — Requirements and recommendations, is a standard that provides appropriate guidance and

³⁷ <https://population.un.org/ProfilesOfAgeing2019/index.html>

recommendations to assist accessibility provisions, covering a wide range of information: from policy-making, strategy, infrastructure , products and services, which is relevant to the entire tourism supply chain. It is applicable to all types of stakeholders in tourism.

ISO 21902:2021 is a new standard. It is written by more than 85 experts from 35 countries of the world. It was adopted in July 2021, after nearly five years of work on it. Until its adoption, there was no such comprehensive standard for accessibility in tourism, and there were certain standards for architecture, urbanism, cultural heritage, which have points of contact with tourism, but there was no special standard for accessibility in tourism. The intention of this standard is that it can be applied in any legal system, worldwide, and its application is on a voluntary basis.

Shown through examples, accessible tourism means that, for example, in order for a beach to be considered accessible, it must offer showers, toilets and a route that can be used by everyone. Also, accessible walking routes in the natural environment must provide, among other requirements, a continuous, firm and stable floor and signage and must offer route details before the start of the route. In general, in their written communications, tourism entities must use clear and simple language in a logical sequence, with pictures and graphic symbols where appropriate, and with contrasting colors and easy-to-read fonts.

The goal is for the standard to become a key tool for enforcing everyone's right to enjoy tourism and leisure. Despite progress in recent decades, there is still a long way to go in many countries before the tourism sector can take into account the needs of more than 1 billion people with disabilities worldwide.

During 2021 and 2022, the WTO, together with partners and experts, is in the process of an awareness campaign to highlight the harmonization of accessible tourism at the global level through standards.

This standard **fulfills 3 sustainable development goals** promoted by the UN Agenda 2030, namely **8, 9 and 10**, that is:

8. Promoting sustainable, inclusive and sustained economic growth, full and productive employment and decent work for all
9. Building resilient infrastructure, promoting inclusive and sustainable industrialization and fostering innovation
10. Reducing inequality within and between countries.

ISO 21902:2021 sets out the requirements and provides guidelines for "accessible tourism for all". **Its purpose** is to ensure through it:

- **Equal access and enjoyment in tourism;**
- **From the widest range of people;**
- **Of all ages and abilities.**

The standard **contains:**

- **Basic requirements;**
- **Policies and strategies;**
- **Transportation:**
- **Urban and rural tourist areas;**
- **Free activities;**
- **Meetings, initiatives, conventions and exhibitions;**
- **Accommodation;**
- **Food and beverage services;**

- **Tour operators and travel agencies;**

There are **8 Annexes** of the Standard that refer to:

- **The 7 principles and 29 directions of Universal Design;**
- **Tables for using principles and guidelines for universal design in the design of communications in tourism;**
- **Color contrast;**
- **The reception;**
- **Accessible public toilets;**
- **The port of guest rooms in accommodation facilities;**
- **Information about the property;**
- **International Air Transport Association-IATA codes.**

There is a **wide range of stakeholders that are included** in this standard, and despite those listed in it, there is no restriction that it can also be applied to other stakeholders in the future.

The stakeholders listed in it are:

- **National tourism bodies;**
- **Public administration;**
- **Entities that provide accommodation services;**
- **Subjects that provide catering and restaurant services;**
- **Transport entities;**
- **Tour operators and travel agencies**
- **Entities that provide services for organizing meetings, initiatives, conventions and exhibitions, as well as leisure activities;**
- **Service providers from other economic sectors related to tourism, travel and destination management;**
- **Including contractors and service providers in tourist destinations;** and
- **End users, i.e. tourists and local population** with or without specific access requirements.

For the purposes of this standard, the following **terms and definitions** are used:

- **Accessible tourism**, which involves a collaborative Universal Design process with stakeholders that enables people with access requirements, including mobility, sight, hearing and cognitive dimensions of access, to function independently and equitably through the delivery of accessible products, services and environments
- **Accessibility;**
- **Accessible guest room;**
- **Accessible tourist observatory;**
- **Alternative format;**
- **More presentation tools, assistance dog;**
- **Destination management organization;**
- **Disability;**
- **Hearing improvement system;**
- **Damage;**
- **Organization;**
- **Participation;**

- Reasonable adjustment;
- Reasonable accommodation;
- Request:
- Rest area;
- Interested party;
- Tourist destination;
- Universal design;
- Usability;
- Verbal communication.

As can be seen in Figure 2, in order to achieve accessible tourism, cooperation and interaction between as many tourism stakeholders as possible is needed, starting from the various tourism operators, travel planning, entities in international transport, as well as local entities in transportation, providers of accommodation services, food services, shopping and medical services, the management of certain tourist sites and destinations.

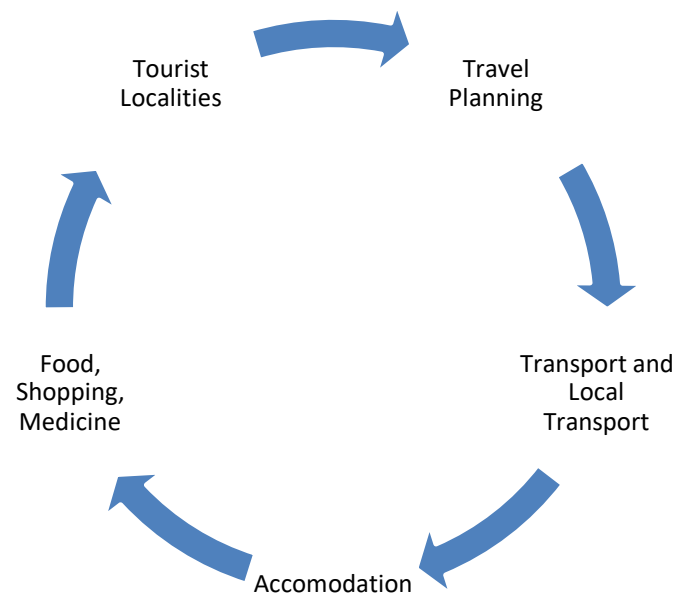


Figure 2. Cooperation between different stakeholders for accessible tourism

Approach to ISO 21902 Standard based on Why-What-Who-How-Where-When questions

This approach allows clarifying the role, objectives, and implementation of the standard in a concise manner.

When asked **WHY**, the answer is because there is not enough legislation, and the goal is to have a harmonized system in the world.

To the question **WHAT** - the answer is that it is a voluntary standard, and it applies to the entire tourism chain in every country, in every part of the tourism sector, transportation, accommodation, and it can also be suitable for almost the entire public sector.

To the question **WHO** - the answer is that it was created at the request of the World Tourism Organization-WTO, together with partners, ONCE-Foundation for Cooperation and Social Inclusion of Persons with Disabilities from Spain, as well as the Spanish Association for Standardization-UNE, associations of persons with special needs, elderly people, families with children, and has a very broad approach in its creation.

To the question **HOW** – the answer is that the first draft of the standard was made as a sum of the different experiences of customers from different countries, and was written by experts from all over the world. Each chapter addresses different stakeholders. The standard has so-called checklists and each entity can see if it fulfills the conditions stipulated in it, it is done as a simplified procedure, and also the travel agencies can ask the hoteliers to fulfill those respective standards and in that case they themselves travel agencies are evaluators of the application of the standard.

To the question **WHERE** - the answer is that the International Organization for Standardization ISO, together with the WTO, includes over 100 experts from 35 countries, and the goal is to be valid in as many countries as possible, that is, over 100 countries on all continents of the world.

To the question **WHEN** - the answer is right now, because the world is in the post-COVID19 era and in this third decade of the XXI century. this standard should be implemented, and thus it will help on a global level in meeting the previously mentioned sustainable development goals of the UN 2030 Agenda.

The chain of accessibility, universal accessibility, must be implemented in the wider tourism chain of valorization, i.e. in:

- **The reservation;**
- **Tickets;**
- **Transportation;**
- **Food and drinks;**
- **Accommodation;**
- **Excursions.**

The big brands of tourist facilities in the world collide daily with the need to satisfy the demands of each visitor, and therefore it is good to have accessibility in the whole process of tourism. For example from the entrance, check-in, elevator, rooms, reservation, check-in, in the rooms, e.g. are the doors very difficult to open, is there room for maneuvering in the rooms for a person using a wheelchair. However, if it is about people with visual disabilities, that such people know the places of their things and orient themselves accordingly, and therefore maids should know that although they should do their job in terms of hygiene, in such a case after cleaning they should return things to the way they were before in the room. These are very everyday examples, but very significant, and therefore the meaning of the provisions of this standard will still gain even more weight. That is why major brands have developed an adequate awareness and understanding of the care and inclusion of all persons with disabilities.

The standard has easily applicable norms and is subject to constant improvement. The best approach is its gradual application, and not to force it completely, suddenly without the countries being sufficiently prepared!

Regarding the certification process, there is no supranational authority, body that will control the implementation process, it is based on a voluntary basis.

3.5.1. Basic Requirements and Recommendations of ISO 21902

The requirements and recommendations are applicable to all tourism service providers. Travel service providers will make the necessary changes in order to make their offer inclusive and accessible to all, keeping in mind the principle of reasonable adjustment.

In the entrances to the places where leisure activities are undertaken and in other places where people are waiting, priority should be given for access to people with reduced mobility and all those who have other needs that create difficulties in waiting, e.g. people on the autistic spectrum, people with mental health problems.

Design of accessible services. Tourism service providers should adopt a holistic approach, ensuring that in all parts of their operations they use a universal design approach in all processes, in order to be inclusive and accessible to all. So from the initial stage, which includes customer information and booking processes, the preparation and execution of the trip, the design and organization of the services offered at the point of travel, and the overall management of customer relations.

The essence of designing accessible services, with universal design, is to ensure that each supplier adequately meets the customer's access requirements and that the suppliers cooperate with each other, and through the tourism valorisation process, to ensure an uninterrupted chain of accessibility for the customer .

The design of accessible tourism services should: take into account the different access requirements that meet the needs of tourists, including people with disabilities; ensure a fair way of performing the services or to do so through reasonable adjustments where necessary; take into account the safety and security of users.

Accessible tourism services should:

- **Enable flexibility and choice;**
- **Have enough stock for the number of customers, e.g. accessible menus, accessible areas in seats, headphones;**
- **Be available without extra charge wherever reasonable.**

Providing a paid service may be better than no service at all.

Accessibility plan. The tourism service provider shall develop an access plan and integrate accessibility into its work plans and customer service plans for places and activities within its ownership, management or control, to which the public has access.

Accessibility should be an integral feature of customer service action plans and, where applicable, strategic plans or strategic statements through:

- Provision of personnel from the so-called first line, to give them training on raising awareness about disability, in order to be able to provide adequate information and assistance to persons with disabilities;
- Identifying accessibility barriers that may be experienced during the visit, e.g. by using tools such as access control to places and activities, and highlighting such barriers in the information they provide.

Information and communication

The information provided should be:

- **Clear and concise;**

- **Updated and reliable;**
- **Available in different formats, including alternative formats, eg, not only in text form, but also in audio, Braille and other formats;**
- **Free.**

Travel service providers should:

- **To ensure the availability of information about the accessibility** of own facilities and services offered within the framework of general tourist information;
- Identify **communication channels**, general or specific for tourists with special needs;
- Make information about the accessibility of facilities and services **available to the relevant staff** and intermediaries;
- State in **the advertising material** whether it is possible to contact the travel service provider using available means, e.g. telephone, fax, e-mail;
- Provide **objective, descriptive data on the accessibility** of facilities and services that are advertised for tourists with disabilities, in order to inform them correctly and facilitate the desired reservation;
- Have **procedures for dealing with complaints and appeals** regarding dissatisfaction with the provision of services where accessibility is advertised.

Specific requirements apply to information provided through:

- Written communication;
- Face to face, telephone and video communication;
- Electronic and web-based communication.

Written communication, e.g. brochures, menus, receipts, text based on images, graphics, symbols and signs should:

- **Use plain language** keeping in mind the following: using useful headings to break up the text; providing clear and concise content; explanation of abbreviations and acronyms used; using short and simple words; writing short sentences and paragraphs; omission of unnecessary words; using the same term for a particular thought or object; avoiding legal, foreign and technical jargon; covering only one topic in each paragraph; using examples; using lists, where appropriate; using tables to facilitate the understanding of some complex material.
- Provide **relevant information** in a logical sequence;
- Have **customer support for easy access**, understanding and use of information;
- Provide customers with a simple way for additional clarification;
- Use **images, illustrations, photographs or graphic symbols** where appropriate;
- Provide **information in alternative formats**;
- Mark the option to receive information through other devices, e.g. information transmitted via Bluetooth, WiFi, 4G, infrared rays to the mobile device;
- Use **affirmative phrases** instead of negative phrases;
- Write the text in small letters, with appropriate use of capital letters when necessary and minimal distance between words;
- Display the **text in readable fonts**, *sans serif*, e.g. Verdana, Arial and be of appropriate size, avoid italic or bold letters, texts arranged on all sides, as well as texts written only in capital letters;

- Use **color contrast**, ie. using different and contrasting colors between the background and the written words, on a plain background ie. without images or watermarks, as shown in Figure 3, while following these recommendations.
 - When the background color of the sign does not contrast significantly with the surrounding surface, a contrasting border should be used around the sign, e.g. there are colors that have a contrast of more than 70%, such are: dark blue with matte white color 95% contrast, **apple green** with white 72%, silver with **brown** 70%.
 - **Color combinations to avoid** are:
 - **yellow/gray**
 - **yellow /white**
 - **yellow /green**
 - **blue/ green**
 - **blue/ black**
 - **turquoise/ green**
 - **red/ green**
 - **red/ orange**
 - **purple/ black**
 - **gray / black**
 - **red/ black**
 - **Avoid using similar colors together:**
 - Pastel colors against white or gray;
 - Dark colors together or against black;
 - Placing bright colors together or against white.
 - **Using paper color with a tint of 10%–15%.** Using paper with a tint such as pale yellow can help reduce paper glare, which some people find uncomfortable.

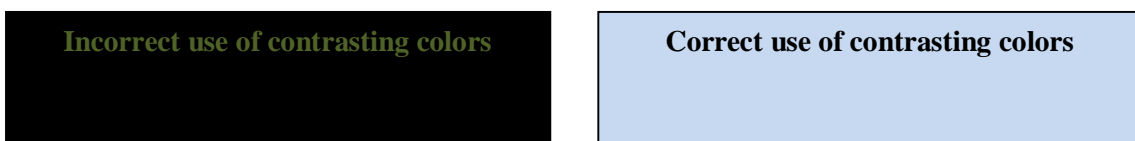


Figure 3. Examples of using correct and incorrect color contrast

Face-to-face communication. Effective verbal and non-verbal communication contributes to better service for all customers. When engaging in verbal communications, e.g. conversations, presentations, speeches, machine voice recordings, sound-based signals such as alarm announcements and public announcements, travel service providers should:

- **Communicate verbally in clear language;**
- **They speak slowly and clearly;**
- **They offer the possibility of written communication,** i.e. using paper and pen for those who cannot hear or speak;

- Provide **relevant information** in a logical sequence;
- **Support customers for easy access**, understanding and use of this information;
- **They listen carefully** to what customers say;
- Confirm that **customers have understood** the given information;
- Provide a **good acoustic environment ie. construction, materials** and technical equipment;
- Provide **good lighting** so that gestures and facial expressions can be seen clearly;
- Offer **translation from verbal information into sign language** when needed, eg. public presentations or speeches;
- They understand the ways in which the body communicates non-verbally, the so-called **body language**. Nonverbal communications refer to the ways the body communicates through gestures, posture, appearance, eye contact, physical contact, facial expression, proximity, and orientation.

Telephone and video communication. When engaging in telephone and video communications, e.g. telephone calls, video calls, travel service providers should:

- **Also consider non-verbal communication;**
- **Promote the use of subtitles and subtitles** on videos to improve communication for customers with hearing, language or learning disabilities;
- Propose **call center connectivity** to provide sign language via video.

When a travel service provider uses an interactive voice response system, or call routing system in their **call center**, the following requirements shall apply:

- The call routing system should be as simple as possible, should not have more than 3 levels, with no more than 4 options per level, and the number of options should be indicated at the beginning of each question.
- The call system to indicate languages for selection if any, during the first interaction with the customer.
- At the beginning of the automated options to provide only essentially relevant information.
- Options to be presented in order of priority based on the number and types of calls the supplier receives, eg if booking requests generate the highest number of calls, this will be the first option presented to the customer.
- When a customer fails to make a recognized selection, they will automatically be redirected to speak live with a call center agent.
- When a customer is placed on hold by the system, music or other signal will be provided to indicate that the customer is on hold, informing them of their progress or position in the queue, if possible.
- Callers will be informed when they successfully complete a transaction.
- When it is necessary to transfer a customer to another agent or department during a call, repetition of unnecessary information collection should be avoided.

Tactile communication in environments and buildings can facilitate orientation and navigation for all people, but especially for people who are blind or visually impaired. Specific tools such as **tactile maps and models**, positive relief writing and drawing, are very useful for tactile recognition and general understanding of the organization and structure of space. Tactile models and representations should be accompanied by additional formats, Braille or audio information.

Acoustic communication.

All content, as well as the most relevant information conveyed by visual means, should also be provided in an **audio format with description**. A hearing enhancement system should be provided, e.g. induction loop, FM system, to enable users of cochlear implants and other assistive devices to access information and communicate effectively.

Audiovisual panels. Digital panels, screens or boards used to display information should follow the following recommendations:

- Be placed at an **appropriate reading height** for people of all sizes and users of mobility aids, e.g. wheelchair users, and should be free of any obstacles;
- Screens should display **relevant information** and be regularly updated;
- All information should be complemented visually, using text and audio, so that relevant information is conveyed both ways. In this regard, speakers should not be placed close to other sound sources that prevent messages from being heard;
- The screen should not have reflective glass, should be protected from direct light and avoid flickering;
- Dynamic content, text line and text in progress should be displayed with enough time to facilitate reading;
- Illuminated signs with **red**, **green** or **blue** lettering should not be used on a **black** background.

Web-based communication. Electronic content provided by the travel service provider, including: websites, billing information, email in applications such as marketing, reservations, should be designed to conform to ISO/IEC 40500:2012 (W3C) Information technology — Guidelines for W3C Web Content Accessibility (WCAG) 2.0.

The informational content in the website or web application, including e.g. text, images, shapes, sounds should:

- Be **noticeable**, be able to be used regardless of the person's ability to see, hear or touch;
- Be **usable**, forms, controls and navigation that are usable;
- Be **comprehensible**, the content and interface should be clear and easy to understand;
- Be **robust**, content can be reliably used by a wide range of devices.

Access to offline documents. Digital documents that can be used to convey information should be preserved in formats that make them easily accessible to the widest range of users, including those who can use screen readers or other assistive technologies to navigate and access digital content. When creating accessible formats, images and data tables should be labeled with alternative descriptions, and other interactive elements, such as form controls or links. Most often it is done in pdf or doc formats.

Text-based digital communications. It is considered best practice for the design of text-based digital communications, eg, email notifications and newsletters, to provide a choice between plain text and Hypertext Markup Language (HTML). This includes both automatically generated and individually written e-mail messages, as well as clarification and confirmation messages sent to the customer.

Trainings. Staff should be aware of the specific needs and difficulties associated with a range of conditions that clients may have, whether their condition is visible or not. Based on their professional role, all staff should be trained to assist and accommodate all tourists, with equal

attention, respect and support. Raising staff awareness plays an important role in minimizing the impact of potential deficiencies in access or addressing contingencies. Training should provide appropriate knowledge appropriate to the needs of clients with a range of ages and functional abilities.

Depending on the work area, **training content** and learning outcomes should include:

- **Raising awareness and knowledge about the meaning of human diversity, inclusiveness, universal design and accessibility;**
- **Identification of users of accessible tourism** and how to improve the way staff will communicate with people with disabilities, especially how to: communicate with hearing-impaired and deaf guests; the persons who are blind or visually impaired are guided; assist people with mobility impairments who use assistive devices, e.g. wheelchair users; communicate with people with cognitive, mental or intellectual disabilities.
- **Understanding the principles of universal design** and their application in the provision of facilities and services, theoretical and practical knowledge;
- **Strategic development of accessibility**, e.g. accessible tourism as a business opportunity; handling complaints and objections from customers with disabilities and turning them into opportunities;
- **Knowledge of the level of available offer of accessibility services** and awareness of existing barriers;
- **Marketing and promotion** of available tourist destinations, products and services;
- Knowledge of **safe use and maintenance of technical aids or access equipment** provided at the site of visit;
- Recognizing and responding appropriately to people who use personal support, guide and assistance dogs, or assistive technology;
- Travel service providers will have **protocols in place** to address the management and use of assistance dogs. For example, if there are interactions with wild animals and how to respond to the situation?!; What to do if an assistance dog is misbehaving?!; What if one of the tourists is allergic to the assistance dog?!;
- **Training evaluation.**

Training can be held in cooperation with persons with disabilities or associations representing the interests of persons with disabilities and be led by trainers with adequate knowledge of accessibility and tourism.

3.5.2. Common Functional Requirements for the Built Environment According to ISO 21902

When the delivery of accessible tourism services³⁸ takes place in a particular building, facility or environment, the associated built environment should be designed, constructed, maintained and managed to ensure accessibility for the widest range of users, to enable people to access, enter, use, exit and evacuate the facility in an appropriate manner.

The main reference for achieving this goal is the standard **ISO 21542 Building construction — Accessibility and usability of the built environment**, which establishes requirements and

³⁸ The relevant legislation of the Republic of North Macedonia regarding these parameters is elaborated at the end of this Study, in Section 4.7. at p.136

recommendations for creating a sustainable and accessible built environment. It addresses the accessibility of buildings and associated common spaces, including:

- **Places for picking up or dropping off passengers and parking;**
- **The sidewalks and paths of the approaches to the building;**
- **Access areas for reception and information for visitors, corridors and spaces in buildings, doors** and elements that allow horizontal circulation on each floor and use of all its spaces;
- **Stairs, ramps, elevators** and other mechanisms that facilitate vertical circulation; as well as
- Elements relating to **safety and fire protection and evacuation.**

Access to building. The service provider should follow the main recommendations with information:

- **Arrival by motor vehicle, with passenger drop-off points located close to the entrances,** allowing convenient access for passengers arriving by taxi, public transport or private vehicles, having appropriate dimensions and design to facilitate access for all users;
- **Accessible main entrances,** which are easily identified;
- **Orientation and wayfinding systems** for guiding all users; and
- **Adequate signaling** and adequate **lighting.**

Designated accessible parking spaces. The service provider should follow the recommendations for:

- Placement of **designated accessible parking spaces** close to the main entrance, with **access paths** to allow easy access to the building or facility;
- Ensuring a **sufficient number** of designated accessible parking spaces for people with mobility disabilities;
- **Adequate dimensions** and adequate **areas and design** of parking spaces, including parking for long vehicles, vans with auxiliary ramps, cranes or elevators to accommodate persons with mobility impairments;
- **Marking for direction from the entrance** of the location or the parking lot to the designated parking spaces and the appropriate marking of the designated parking spaces;
- **Continuity of the access route** to and from the parking spaces to the facilities, including the provision of sidewalk ramps;
- Provision of accessible parking control systems.

Paths to buildings. The service provider should follow the recommendations for:

- Provisions for **wayfinding** or other physical support of information, eg. tags, to **facilitate identification,** and ensure access to all users;
- **Avoiding obstructions** on the path or route and providing hazard warnings where necessary to ensure safe use by all users, including the visually impaired;
- Design parameters to ensure a **continuous access route,** including: cross-fall slopes, smooth and slip-resistant surfaces, sufficient surface drainage and unobstructed width consistent with traffic flow to allow users to diverge between themselves, including persons using wheelchairs for mobility;

- Provision of **adequate space and height for the head**;
- Provision of **stepped walkways**, in addition to ramps, for ambulatory persons who may have difficulty using a ramp;
- Provision of **suitable slopes** for stairways and ramps;

Ramps. The service provider should follow the recommendations with information on:

- **The percentage of slope and length** to ensure safe and independent use of the ramps by all users, including persons using wheelchairs;
- The design **parameters for width, slopes and fences** to support and direct users;
- **Drainage and surfacing materials** to ensure safe use;
- **Edge protection by protecting** users from injury as a result of falling from a ramp or a slope.

Building entrances. The service provider should follow the recommendations with information on:

- **Easy location** identification to designated parking access points, wayfinding facilities, and limited exposure to rain and snow to ensure safe and convenient use;
- **Level or flat access**, with entrance doors with low thresholds, to allow convenient access for all users including people using wheeled mobility devices;
- **Entrance doors that are easy to operate and of adequate width**, clear height and circulation space to allow unhindered passage;
- Provision of **alternative access/es, entrance/s**, which are clearly marked, in the case of the presence of stairs or a revolving door at the main entrance, to ensure unhindered access;
- **Entrance lobbies and halls with adequate space for maneuvering** between the doors;
- **Conveniently located information relating to fire protection and evacuation procedures**, including in **alternative formats** to enable all users to understand them.

Receptions, counters, desks and ticket offices. The service provider should follow the recommendations with information on:

- **Easy identification** and access from the entrance of the building;
- Provision of a **hearing enhancement system**, e.g. an induction system, to help users with hearing aids;
- Provision of **sufficient lighting** and uniform illumination without glare, to facilitate lip reading;
- Providing **accessible surfaces for communication**, including writing or transactions, with adequate maneuvering space to accommodate advanced access by persons using mobility wheelchairs.

Access routes in buildings. The service provider should follow the recommendations with information on:

- Providing a **horizontal circulation design** that ensures that the building is accessible to all people;
- **Provision of ramps or lifts** where level differences cannot be avoided;
- **Easy circulation** by providing **wide and unobstructed corridors** that allow a person using a wheelchair to pass another person and turn;

- **Circulation paths that are free of obstacles** and dangerous bumps to ensure the safety of everyone, especially the visually impaired;
- Provision of **tactile indicators** of the walking surface to warn of any changes in level, e.g. stairs, ramps, platforms, or to facilitate orientation and circulation for routes that are part of large open spaces;
- Provision of **internal ramps where necessary**, with the lowest practicable percentage gradient and with adequate lighting levels to facilitate safe and comfortable circulation for all;
- **Use of an elevator** whenever the change in vertical height is greater than one floor.

Floor and wall surfaces. The service provider should follow the recommendations with information on:

- Provision of floor surfaces that are resistant to slipping when dry or wet, to ensure the safety of users;
- Providing solid and stable floor surfaces that do not pose a hazard, e.g. avoiding loose or raised corners;
- Provision of continuous visual and/or tactile surfaces for warning of dangers or directing visually impaired persons;
- Provision of floors and wall surfaces that do not affect perception and orientation, e.g. to have no glare, contrast with the furniture and walls;
- Design parameters that contribute to an acoustic environment that supports the orientation of the visually impaired.

Doors and door devices. The service provider should follow the recommendations with information on:

- Design parameters for doors of **appropriate width and height and with easy-to-operate door devices**, e.g. doorknobs and thresholds, at a level to facilitate use for all users;
- Provision of **adequate space for maneuvering** at a convenient level on both sides of the door;
- **Visual contrast between doors**, door frames, adjacent walls and floors to facilitate navigation and circulation;
- Use of **visual panels** in doors to facilitate security;
- Provision of **visual indicators** on glazed doors and panels to aid orientation and prevent collisions for all users, especially the visually impaired;
- Providing an **additional access door** where there is a revolving door;
- Recommendations for **fireproof** doors.

Windows and window handles. The service provider should follow the recommendations with information on:

- Windows that are **easy to operate**;
- With **appropriate positioning and design** of the handles, which can be used only with one hand or a remote control;
- **Adequate height** of the lower edges of the glazing to allow the person sitting to be able to see through the window.

Stairs. The service provider should follow the recommendations with information on:

- **Even stairs and stair height**, without open risers or cavities that could be a tripping hazard;
- **Visual markings to identify the edge** of each step and tactile markings at the top of entrance slopes;
- Stairs of **adequate width** between railings to support regular use and pedestrian flow, and in case of fire to allow evacuation of persons using evacuation devices, e.g. an evacuation chair, while allowing emergency services access;
- **Minimum lighting levels** to facilitate safe circulation.

Fences and Railings provide a means of support, stability and guidance to the user when ascending or descending stairs or a ramp. The service provider should follow the recommendations with information on:

- **Provision of continuous handrails** on both sides of stairs or ramps to support and guide users;
- Design parameters for mounting heights and horizontal **extensions**;
- Fences with a **size, shape and surface that is easy to grasp**, with visual contrast and tactile information to support the guidance of visually impaired people.

Elevators. The service provider should follow the recommendations with information on:

- **Lift door widths and cabin dimensions** that can accommodate a range of manual and powered wheeled mobility devices and walking aids;
- Provision of **handrails, a mirror** in the cabin and, where provided, a folding seat;
- Design parameters for **floor and wall surfaces, materials, lighting** and controls to accommodate all users;
- **Emergency warnings**;
- Provision of **alarm devices** which is a two-way communication system, permanently connected to a manned security point.

Vertical and inclined lifting platforms are used to ensure accessibility in a building, when it is not possible to implement solutions such as ramps or lifts. Vertical and inclined lifting platforms are designed to be used alone and also with an attendant. The service provider should follow the recommendations with information on:

- **Platform dimensions** that can accommodate a range of hand-held and powered wheeled devices;
- **Access** to control devices;
- **Location** relative to adjacent firefighting elements and rescue areas.

Escalators and moving walkways cannot be used easily and safely by many people, including people with mobility or sensory impairments, as well as older people and young children. However, they can be installed as a way to supplement access routes in larger buildings and public use facilities with a high density of users. Some people with mobility aids can feel comfortable and able to use them independently.

Lifts are more convenient for most people with disabilities, and especially for people who use mobility aids, e.g. users of wheelchairs, crutches, and people with assistance dogs. The service provider should follow the recommendations with information about:

- **Safety warnings** at the top and bottom of the escalators;

- **Design parameters for inclined** moving walks corresponding to those for ramps.

Toilets and sanitary facilities. When providing public toilets for general use, consideration of accessibility in the design can benefit many users who may not have specific access requirements or impairments. For example spacious toilet spaces benefit people who are obese; good visual contrast between walls, floors, doors and orientation for fixed support of all users, especially the visually impaired; wall-hung urinals of different heights are suitable for people who are tall or short; providing grab rails next to the sink is beneficial for people who are elderly and people with poor balance; single lever taps are easy to operate for users with temporary injuries or arthritis; and sufficient lighting contributes to the practical and safe use of toilets by all users. The service provider should follow the recommendations with information on:

- Provisions for the **minimum number of accessible toilets** according to the type of tourist facility, where it is not specified in the national or local legislation;
- **Design parameters** for the toilet cistern, for ambulatory disabled people, e.g. **height of the toilet seat**, clear **space for maneuvering**, **type of door**, **provision of grab rails** and independent water supply beside the toilet;
- Design, layout, dimensions and fittings for different types of **toilets accessible to wheelchair users** with room to maneuver to allow frontal, oblique and lateral transfer to and from the toilet seat, independent water supply beside the toilet, suitable toilet and sink, handrails, emergency systems, including visual alarms and monitored emergency call devices;
- Design parameters of wall-mounted **urinals** for wheelchair users and standing users, where provided;
- Design parameters, layout, dimensions and fittings for level access **showers** suitable for wheelchair users and ambulatory disabled persons, e.g. adequate space for maneuvering, providing shower seat and grab rails, shower controls and shower head, easy to reach and use;
- Design parameters, layout, dimensions and connections for **bath tubs**, where provided, with a transfer surface, grab rails and provisions to enable the use of a mobile or ceiling mounted hoist.
- Bathrooms, toilets and sanitary facilities may also include facilities such as **baby changing rooms and cupboards**, sinks and sanitary facilities should be provided in both male and female toilets.

Lighting. Having adequate lighting is especially important for the visually impaired, and it also ensures that the hearing impaired can read lips or see a sign language interpreter properly. The service provider should follow the recommendations with information on:

- **Coordination of artificial lighting with natural** light;
- The role of artificial and natural lighting and the potential **problems associated with glare, reflections**, shadowy areas and pockets of light, and excessive dark contrasts;
- **Lighting levels for areas** with different functions, e.g. access routes, counters, desks, toilets.

Equipment, controls and switches. Controls and switches installed along the access route, at a height accessible to people sitting in a wheelchair or using a wheeled mobility device, allow

people to operate them safely and independently. The service provider should follow the recommendations with information on:

- **Installation location and maneuvering** provisions to facilitate access and use;
- **Mounting heights** of equipment, controls and switches, e.g. thermostats, door locks, light switches, to facilitate operation for persons with disabilities;
- Provision of **visual contrast**, tactile and Braille characters;
- **Lighting levels** to facilitate work and reading where necessary;
- **Distance** between adjacent bodies;
- **Functional design** and activation mechanisms;
- Layout, mounting heights and reporting of waiting systems, e.g. barriers for guides, devices, e.g. ticket dispensers and controls, e.g. service counter, service location identification;
- **Accessibility and usability of public telephones**;
- **Location and accessibility** of devices and controls of **ticket machines, automated ATMs and other machines**.

Furniture. Seating facilities and furniture in public buildings provide people with a place to wait, rest, or simply receive service. The service provider should follow the recommendations with information on:

- Provision of **seating areas with different types of seating furniture**, e.g. with or without backrests, armrests, fixed seats, to facilitate sitting and standing for a large number of users, e.g. obese persons, elderly people, pregnant women;
- Design **parameters of tables, desks, counters, displays** and similar furniture so that they are accessible and usable by everyone, including people who use wheelchairs;
- **Seating areas in the waiting rooms**, for users of mobility devices with wheels, so as not to disturb the general circulation;
- **Care for people with guide dogs** or other assistance dogs.

Marking. The design of the signs, which takes into account the access needs of a diverse range of visitors with different functional requirements, allows tourists to locate places and possible dangers and to orient themselves in an unfamiliar environment.

3.5.3. ISO 21902 and Public Sector Accessibility Policies and Strategies

Tourist destinations that aim to position themselves as inclusive and open to all visitors should base their activities in the context of the requirement for "Accessible Tourism for All", which enables appropriate and well-coordinated planning, implementation, monitoring and regular improvements. Strategies for accessible tourism represent concrete activities for the implementation of adopted policies and for accessible tourism to be sustainable, profitable and competitive. The scope of these policies and strategies will depend on a number of factors, including: the level of tourism development, the number of visitors and socio-economic factors. Recommendations aimed at public administration can be implemented by a **wide range of stakeholders**, namely:

- **The national authorities responsible for tourism**, in charge of creating policies and regulatory instruments;

- **National tourism organizations**, Destination Management Organizations, which are in charge of marketing and promotion at different levels, national, regional and local, which can be with different management models, public or public-private;
- **Legislators** at the national and local level;
- **Other national, regional and local bodies**, including municipal departments in charge of: leisure and tourism, infrastructure development, education, culture, industry, trade, health and social affairs and other bodies that make agreements for interventions related to tourism through procedures for public acquisitions.

Proposals for public administration. National authorities responsible for tourism, National Tourism Organizations, Destination Management Organizations, and other public bodies in charge of tourism at national, regional and local levels, play an essential role in creating an accessible environment for the consultation process between the various stakeholders in designing and adoption of policy frameworks relevant to accessible tourism. In order to implement such goals, public administration bodies should undertake the following activities:

- **Application of universal design** either within general tourism planning or as a specific strategic action, or a combination;
- **Developing normative instruments** that ensure the application of the principles of universal design in tourism infrastructure, products and services.
- Developing mechanisms that will enable **the public administration to monitor compliance with the implementation of relevant legislation on accessibility** by tourism sector stakeholders and apply sanctions, when necessary;
- **Encouraging investments for reconstruction or adaptation** of existing tourist infrastructure, products and services, and development of new ones;
- Developing an **accountability mechanism for the public administration** regarding the payment of funds intended for the promotion of accessibility, as well as monitoring instruments to assess the results of their use;
- **Gathering systematic visitor feedback and statistics** on numbers, satisfaction, behaviour, spending and other variables in order to measure and monitor the results of accessible tourism policies and actions and to improve the overall performance of destinations.
- **Qualitative questions related to accessible tourism should be included in visitor satisfaction surveys**, e.g. number of persons with disabilities, type of disability, number of traveling companions, bearing in mind that disabilities are diverse in nature and cannot always be easily quantified;
- **Providing relevant information to service providers** on all available training instruments and schemes that enable them to respond to the diverse needs of clients.
- **Consulting with various organizations for the protection of persons with disabilities** and interested parties in the tourism industry during all stages of planning and development of accessible tourism;
- **Encouraging, rewarding and spreading the best practices** in accessible tourism;
- **Providing information about the accessibility** of facilities and services. This information should be provided in an accessible manner.

These actions can be developed or promoted by public administration bodies within the following frameworks:

- **Legislation, policies, standards or guidelines;**

- **Awareness raising and training;**
- **Research and innovations** in accessible tourism;
- Strategies for **marketing and promotion;**
- **Accessibility management in tourist destinations.**

Legislation, policies, standards or guidelines. Public administrations should be encouraged to adopt policies or an appropriate normative framework relevant to accessibility in tourism. Policies, standards and guidelines for accessibility legislation should be adopted based on the principles of equal opportunities for all, without discrimination against persons with disabilities. Such instruments should respect the following basic principles:

- **Access to the infrastructure, products and services** for persons with any form of disability, physical, sensory and intellectual, or a specific access condition;
- **Eliminating physical, informational, cultural** and attitudinal barriers to achieve accessibility;
- Ensuring the **integrity of the accessible tourism value chain**, so that all elements are adequately covered by a legislative framework;
- Consideration of the principle of **reasonable adjustment;**
- **Consultations** with stakeholders.

Policies and normative instruments in the area of accessibility should cover environments and services used by tourists and local people, especially those directly related to the tourism sector, namely:

- **Built environments;**
- **Public and urban spaces;**
- **Cultural goods;**
- **Infrastructure;**
- **Transport;**
- **Communication and information;**
- **General and special services;**
- **Training.**

The accessibility regulation should be developed in one of the following ways:

- **By adding the legislation on accessibility to the general tourism legislation;**
- **By passing a special law on accessible tourism;**
- **By developing general accessibility legislation** that covers the entire tourism value chain, taking into account the specifics of the sector;
- **By developing other legal or regulatory instruments** depending on the governmental and administrative structure of each country in order to provide a normative framework and respond to the inclusion of persons with disabilities in tourism.

After the normative framework is adopted, the public administration should proceed with the following activities:

- **Dissemination of specific requirements** that allow different stakeholders to assess the degree of accessibility;
- **Setting priorities for the application** of normative instruments;

- **Coordinating the implementation of specific actions and projects** aimed at improving universal accessibility;
- **Applying regulations that define the minimum requirements for accessibility;**
- **Adopt technical standards and indicators** to assess accessibility levels in destinations and promote consistent uniform assessment schemes based on universal design principles;
- Establishing **economic and fiscal incentives** for tourism companies to apply accessibility requirements;
- Promoting **training programs;**
- Developing **support programs that encourage the labor inclusion of persons with disabilities.**

3.5.4. Elements of Traffic Circulation According to ISO 21902

Transport stops on the quay, intermodal transfer, bus stop. When the place of departure or arrival of the means of transport is not urban, e.g. bus stops, taxis, and other small transport vehicles, tourist buses, this should be applied:

- To have a **mark for the exact location** from where the means of transport departs or arrives;
- To **provide space for safe boarding and alighting** of passengers, at the height of the floor of the vehicle, to enable boarding and alighting from the vehicle;
- In the case of buses, or road transport, the associated infrastructure should be located on the pavement or **include standardized sidewalks with curbs equipped with curb ramps**, to achieve better positioning of the ramp next to the vehicle or for safer boarding of passengers;
- **Shelters, at bus stops**, should be provided with a **minimum distance from obstacles** from side or central access to the structure of the stop or awning. The space in the shelter should be sufficient to accommodate a certain number of people and wheelchair users;
- The shelter should have elements that **provide shade** or shelter from the sun, rain and wind. It should also have well-designed seats and supports;
- The design of the shelter or stop should facilitate its location and **provide information about the transport service** within it, e.g. number of stops, lines, timetables, in an accessible way, ie. visual, acoustic and in alternative formats using different technologies;
- **The tactile floor of the stop** can be used to facilitate its location and indicate a warning in the gap between the fixed surface and the vehicle
- On platforms, bus stops or taxi stands or other waiting areas for small public transport vehicles, where the wait is usually shorter, should have **support elements at different heights;**
- For taxi stands, there is often only one **location signal with information, such as a telephone number.** If so, they should adhere to all directions given regarding their location, signage and provision of information to ensure accessibility.

External horizontal circulation. Horizontal circulation should comply with national road regulations and street accessibility regulations:

- **Pedestrian areas** should consider **at least 1 accessible pedestrian route** to reach any point of tourist interest or tourist service, e.g. access to accommodation, transport;
- **Streets** should contain all detailed requirements for **accessible routes, and circulation spaces**.

Circulation spaces and accessible pedestrian routes. Access pedestrian routes should be of **sufficient width and height** to guarantee the possibility of circulation, crossing and maneuvering for all pedestrians, e.g. visually impaired people who use guide dogs, people who use wheelchairs. The urban elements of the accessible pedestrian route should be aligned in an orderly manner and without obstructing the clear passage of the pedestrian path. In commercial areas, **obstructions should be avoided**, e.g. signs, merchandise, tables and chairs, bar umbrellas, awnings, which obstruct access routes.

Surface materials and pavements. Unfavorable weather conditions, e.g. rain, ice, snow, should be considered in the accessibility of the pavement in terms of slip resistance and ease of walking. Therefore, the pavement should be non-slippery in dry or wet conditions and kept free of snow, ice, leaves or any other element that makes walking difficult. Also, the arrangement of grates and drains should have a size that does not hinder passage with a wheelchair, cane, etc.

The following requirements and recommendations according to the standards apply to **Pedestrian Crossings**:

- They should be of **adequate width** to allow two people to cross the carriageway together, or to pass each other easily and safely and without undue delay or obstruction;
- They should be **properly located and clearly marked** and without obstacles, be visible to all pedestrians;
- Should have **level access with a pavement ramp** or raised road crossing, eg. with adequate lateral and longitudinal slopes to enable all individuals, including people using pushchairs, parents with pushchairs and those with walking difficulties to cross the carriageway independently, easily and safely;
- To have a **tactile warning** for visually impaired people across the entire width of the flat surface where there is a drop in the pavement or a raised road;
- Where necessary, **sound signals** for the status of traffic lights should be provided for the visually impaired;
- Where **visual crossing signals** are provided, they should be supplemented by audible signals.

Cycle paths should have a separate part of the pedestrian path and they should not prevent the use of available additional works and facilities, e.g. bus stops, curb ramps. Although there are different priority criteria, in different countries and systems, accessibility and pedestrian safety should be ensured in any case!

Regarding **Stairs and Ramps**:

- External ramps and their approaches **should have adequate drainage**, to avoid water flowing down the ramp or collecting water on slopes and approaches;

- **The drainage grid** that is within the limits of the ramp should be placed at the same level with the surface and have narrow openings, perpendicular to the pedestrian path of movement, to avoid discomfort or jamming;
- **Surface materials** used for the external ramp should be durable and easy to maintain, and should be slip resistant when wet;
- Railing material provided for external stairs or ramps **should have low thermal conductivity properties** to avoid discomfort when users get hold of them.

Public services in pedestrian tourist routes include:

- **Seating area**, rest areas with appropriate seating will be available along the tourist routes, e.g. height, backrest, armrest, and protective zone, e.g. from rain, sun, wind, snow;
- **Public toilets**. Public toilets should be promoted to facilitate their use by tourists. These toilets should be accessible, ie. easy to locate and use, and should have dimensions and features to facilitate use by any person, regardless of their capabilities
- **Tourist information centers**, there should be tourist information points in the main points of the city. These spaces should be accessible, eg location, maneuvering space, counter, visual and acoustic information.
- **Accessible urban wayfinding systems for tourists**. The use of specific accessible elements in the urban environment should be promoted, such as urban maps, directional signage for pedestrians from points of interest, light and lighting, pedestrian routes, etc. Accessible mobile applications that provide information on the accessibility of toilets, restaurants, etc. can also be used. Location maps of specific points on the route should be provided with indications of footpaths, spaces, distances, available services or specify available routes and current location.

3.5.5. Special Requirements of ISO 21902 for Special Tourist Areas

The surroundings of places of tourist interest. The environment of the tourist attractions, ie. nearby museums, monuments, stations, hotels, beaches are areas with a greater influx of tourists who may not be familiar with the city, so the accessibility of such elements and spaces should be taken into account, in particular:

- **Reservation of parking spaces and reserved spaces** for persons with reduced mobility and continuous and safe routes for pedestrians;
- **Public transport connections and provision of connection areas** to and from public transport should have simple and precise information about the services provided there eg. destinations and schedules;
- Outdoor **signposting of pedestrian routes** to and from points of interest in the city, e.g. from the urban center.

Tourist routes in localities with cultural-historical heritage and historical city centers. In many tourist destinations, the historic city center is one of the most visited areas, but accessibility difficulties are encountered for some visitors. For this reason, the following specific requirements and recommendations should be met:

- Sidewalks should have **sufficient clear width for an ordinary person and a wheelchair user to pass**. If this is not possible, the possibility of walking should be considered, i.e. limiting street access to pedestrians only;
- **The accessible footpath should be level**, avoiding the use of cobblestones or individual pavements with separate pieces. If this is not possible, one solution may be to provide a level path with the joints between the cobbles leveled to facilitate the passage of wheelchairs, prams, etc., so that there are no trips and falls. It should also be ensured that the surface is not slippery, in dry or wet conditions;
- In **complex routes, directional marking and signaling of main points of interest and reference points should be strengthened**, in order to facilitate the orientation of tourists and prevent people from getting lost;
- It is necessary **to facilitate the accommodation of means of transport** for persons with mobility impairments, especially when the entire center is very difficult to pass. The passage of adapted vehicles, which provide services for persons with special needs, should be allowed, even in limited spaces. In addition, proximity to public transport stops should be facilitated without having to walk long distances.

Archaeological sites. When excavating archaeological sites, the visitable area should be accessible in its entirety by an accessible itinerary, but care must be taken not to damage the very features that make the site attractive in the first place. They should consider:

- **The accessibility of the route, and stairs and ramps with a steep slope should be avoided.** The route should have **adequate width for the passage of two people or for the maneuvering of a wheelchair**, and in addition there should be side guards, when necessary without obstructing the view of the archaeological remains;
- **Flooring materials and gratings** that are steel should be avoided as canes, crutches, shoe heels can become stuck or caught, resulting in potential falls. In addition, such a floor can cause problems with vertigo;
- **The place should be well lit** throughout during working hours, regardless of whether it is day or night.

Tourist routes in shopping streets and leisure and hospitality areas. In the streets or commercial areas of tourist destinations, a large number of people and elements can hinder accessibility, so in these areas special consideration should be given and should be:

- Provide signage, so that there is always a **reference for guiding tourists**, despite the number of people and elements;
- **Commercial elements**, including in-store elements, e.g. information about menus, product samples, should be arranged so that they are easily noticeable and do not represent an obstacle for tourists;
- **Access to shops is important for everyone**, and shops with stairs should be avoided. Additionally, stores with confusing or difficult identification should be avoided.

Cultural tourism. Museums, exhibition halls, performance centers and buildings of tourist interest, including: stadiums, factories, skyscrapers, theme parks, monuments, city centers or any attraction where there is something to experience, discover or learn have always been desired cult centers for the tourists. In addition to ensuring accessibility to the built environment, it should be ensured that the content is accessible and that it is presented in

different formats, in order to convey information and sensory experiences to each person in a way that they can be understood and perceived.

The service provider will offer an alternative to persons with disabilities that will allow them to enjoy an experience through activities and services that are provided periodically or at their request.

To ensure accessibility of content, the following measures should be taken into account:

- **Ads should appeal to a wide range of people, using different formats**, e.g. easy to read, sign language videos;
- **Reservation services** should be provided **in a manner that is accessible to persons with disabilities** and ensure a fair level of service;
- **Available and diverse educational programs** should address the different senses;
- **Intellectual, cultural and language barriers should be avoided**;
- **Museums should take into account multiple intellectual levels and share their knowledge in different ways**;
- **Information** should be provided in **alternative formats**, eg. acoustic, visual, tactile;
- **Museums should allow artifacts to be touched whenever possible, or should make scale models, 3D replicas** or educational sheets in relief that identify the content of the original. For the position of tactile objects, e.g. plans, exhibits, in the much-visited museums it should be taken into account that experiencing them requires time and a quiet environment. Brief information should also be provided in raised tactile letters and Braille;
- **High contrasts between the exhibits and their backgrounds should be used**, as well as the possibility of viewing from a short distance;
- **Information in the text of the exhibition label should be appropriate and accessible** in terms of its location and design, e.g. height, text size, contrast, raised tactile letters and Braille;
- The provision of a **hearing enhancement system** to assist hearing aid users during travel, workshops or events, eg. induction loops, FM systems, or headphones with receivers;
- **Sign language services** should be provided. Sign language videos can be used in permanent exhibitions;
- **Furniture, especially glass showcases or cases, should be ergonomic**. People standing or sitting at different heights should have a good view of the artifacts;
- Technology resources, such as **audio and video guides**, should be offered that are also accessible in terms of their mode and operation and their communication resources with audio description, closed captioning and sign language where appropriate. It may also include content available over the Internet;
- The development of information technologies, information panels, interactive screens and internet applications, e.g. infrared rays, two-dimensional codes, **QR codes**, should be equally accessible to all people, and therefore should meet the technical requirements of ISO 9241- 20:2008 Ergonomics of human-system interaction;
- If interactive games for children are offered, they should be accessible;
- **Guides should receive awareness training** and have knowledge of the use of devices for persons with disabilities;
- **Cooperation with organizations or experts representing the interests of persons with disabilities should be established**;

- **Adequate lighting** should be guaranteed, and reflections and disturbing glare should be avoided at different eye heights and viewing angles;
- **Information about the exhibition and artefacts**, in brochures, publications, should be offered in different formats, e.g. simplified itineraries, simplified and concise description of the exhibition and artefacts, guides in large letters, with high contrasts, publications in audio format;
- In places that are expected to be crowded or have a noisy background, there should be **a quiet area or a rest room** for people with disabilities, and other people who may need to rest.

Cinemas, theaters, concert halls and auditoriums. Information about cinemas, theaters and auditoriums as well as their programs should be provided in different and **accessible formats**. To ensure **accessibility of ticket bookings**, various options should be provided, e.g. through websites or in person, and their accessibility should be guaranteed, e.g. website available, physical access to the ticket shop, access to main information.

For these spaces to be accessible, service providers should ensure the provision of accessible reserved spaces in all rooms and provide alternatives to access content, in order to enjoy the experience. The specific location of reserved spaces should be determined based on equality criteria, without reserving areas with low or zero visibility or areas with restricted circulation, nor obstructing the visibility of other people behind them.

The service provider should **integrate the available seats**, ie. those used by persons in wheelchairs, with other seats. Two wheelchair users should be able to sit together. To enable wheelchair users to transfer to a seat, the armrest of the seats at the end of the row should be movable.

If inside the cinema, the theater, the auditorium are provided other services, such as cafeterias or parking, in addition to dressing rooms and toilets behind the scenes of theaters and other places for entertainment, for use by persons who may be involved in the play, whether as a performer, director, backstage staff, the requirements, recommendations are to be able to ensure accessibility.

Accessible hiking trails in natural environments. Access routes should have **stable and continuous solid ground, i.e. space free of obstructions** to circulation, by providing affordable alternatives to existing uneven sections, e.g. paths, crushed gravel. Access routes should also provide **sufficient signaling and lighting, warning systems** and protection of crossings and guiding elements, especially when there is an alternative access route for some sections.

In natural environments, where there have been interventions to make them accessible, there cannot be inaccessible parts once the person starts along the route, so accessible routes and their continuity should be guaranteed. Although this should always be done, in this case, every detail of the route will be communicated, before starting the route, to avoid any risks or accidents.

The recreational path should have, on a certain section of the path, a sign that provides information about: the length of the path, the type of surface on which the path is built, the average and minimum width of the path and the average and maximum transverse slope and slope, and a warning of possible hazards or dangerous spots along the track.

Camping. This form of accommodation is characterized by its connection with the natural environment and can be done through different options: camping tents, camper vans, caravans, cabins, bungalows, etc. In camping, there is a wide range of related services, such as cafes, supermarkets and shops, sports areas and other activities. In that case, accessibility should be ensured in all sleeping places or at least in some of them, and the same applies to toilets and changing rooms, and other activities in the camp.

Access to beaches. This issue was discussed in more detail above in the processing section of ISO 13009, however, a review is given here of the beach accessibility provisions contained in ISO 21902.

City beaches or beaches with a large number of visitors should have **accessible public transport to get there** and sufficient parking spaces reserved for people with reduced mobility.

Along the promenade by the sea quay, **at least 1 access route should be provided**, exclusively for pedestrians, with a ban on bicycles, scooters and other means of personal mobility. It should have enough places with seats, preferably of different types, and if there are different height levels, they should be connected by ramps.

Beach access point. At least 1 access point should be provided on city and beaches with a large number of visitors. The beach access point should have at least:

- **Information about the facilities and available services** on the beach;
- **Accessible shower;**
- **Accessible toilet;**
- **Access route from the entrance to the water;**
- **Rescue station** near the beach;
- **Rest area with shade** and solid pavement;
- **Accessible drinking water;**
- **Personal assistance services for bathing and swimming;**
- **Mobility equipment** available for bathing and swimming such as amphibious chairs, amphibious crutches or beach wheelchairs.

Accessible walking paths on the beach. They should **extend continuously from the sea promenade to the water's edge, have suitable slopes and be without stairs.** The surface should be **wide enough, with a stable pavement** and without projections that make walking difficult. Edges should be contrasting so they can be easily identified and should take into account the change in water level at high and low tides.

Bathing and swimming accessibility services, which if available in abundance can improve the attractiveness of the beach for a variety of visitors. Such services are:

- Bathing and swimming services **for people who are blind or visually impaired**, e.g. audio beach services;
- Services **for the loan of amphibious crutches or wheelchairs** for the beach;
- Information about the **accessibility of personal assistance services** for bathing and swimming, including timetables and times of the year in which this service is provided.

Accessibility in Shopping Facilities applies to the whole range of retail outlets, **from small shops to large department stores, supermarkets, shopping centers and retail parks.** All retail premises and associated exterior areas shall **be universally designed** to facilitate equitable customer access and provide access to employment for persons with different access requirements or disabilities.

Physical access to the premises. Retail stores should provide **equal and safe access for all customers**, including people with disabilities, allowing them to enter, find their way around independently and safely, and locate desired products and services on offer.

Where entrances for one customer only, or one-way gates at the entrances, are installed, consideration should be given to the range of users who may pass through them. Where such single-person, or ticketing control devices are not available, an adjacent opening gate of adequate width should be provided to allow free and clear passage for persons using a wheelchair, scooter or other mobility aid on wheels, such places must be marked with the international symbol for accessibility.

Internal circulation. An efficient layout should aim to make the **best use of the sales area and provide adequate access routes for internal circulation**. Customers should have **independent access to all areas, including merchandise, displays, changing rooms, cashiers, customer service points and toilets**. Circulation routes should have a minimum clear width to allow people to move in both directions easily and comfortable to spend with each other. All access routes should be well maintained, free of obstructions and have adequate headroom.

Display areas and storage areas. Display areas in accessible stores should be **as conveniently located as possible for customers using mobility devices**. As far as possible, display shelves should be on an accessible route with adequate space to allow customers using mobility devices to access merchandise.

Counters and cash registers. Where a series of checkouts are provided, at least **1 of them should be marked for priority for persons with reduced mobility** and consideration should be given to having a double-height counter or a series of counters at different heights wherever possible. Consideration should be given to providing seating near counters and cash registers.

Equipment for storage and sales. Where **vending machines, large refrigerators** or other similar storage units are provided, they should be **designed to enable their use by all customers**. For example, refrigerators and freezers that open with sliding doors should be used instead of those that open by pulling towards the person.

Changing rooms. In clothing stores, **at least 1 changing room should be accessible to persons with disabilities**, and be of sufficient clear width inside to provide adequate maneuvering space for people using wheeled mobility devices. There should also be a bench that allows rest and transfer from the wheelchair.

Sanitary facilities, baby changing areas and toilets. Larger retail stores, shopping centers and retail parks should provide toilets that are accessible to people with special needs. Baby changing, washing and sanitary facilities should be provided in both men's and women's toilets.

Information and signs. Orientation and wayfinding information should be universally designed to benefit all customers. Customer information and announcements should be delivered by audio and visual means whenever possible.

Provision of a wheelchair on loan. Larger retail outlets should provide wheelchairs or shopping scooters on temporary loan for use by customers with walking difficulties while inside the establishment.

Parking facilities. An adequate number of parking spaces should be required depending on the size of an event. **A sufficient number of designated accessible parking spaces** should be provided for the expected number of participants arriving in private cars or vans.

Where a venue provides its own private parking space, it should follow the following recommendations:

- Confirming that they will have **stewards to monitor** the use of accessible parking spaces, which will be used only by people who need them;
- Consideration of whether there are **staff prepared** to assist people from their cars to the entrance of the venue, especially if the car park is not on level ground;
- If parking is provided at the basement level, check if there is an **accessible elevator** to the venue.

3.5.6. Accessibility in Accommodation Facilities According to ISO 21902

Within the tourism sector, accommodation can be defined according to the different types of: hotels, hostels, self-catering accommodation, bed and breakfasts, campsites, guest apartments, log cabins, cottages, apartments, holiday homes. Accessible accommodations are one of the main concerns for people with special needs.

Accessibility is not standardized in the accommodation industry. However, accommodation requirements to provide different elements to guests with different access needs are often subject to national standards or regulations.

For the Services, these requirements and recommendations should be met:

- The accessibility of the services offered by accommodation facilities should be described and made available to clients and staff working with clients, e.g. in the form of an **Accessibility Guide**;
- The accommodation facility's **reservation management system** should be designed to allow staff to check if there is an accessible room that meets guest accessibility requirements;
- The accommodation facility should **provide the guests with various audio and visual means**, with which they can communicate in the common areas or in the rooms;
- **Hearing enhancement systems** should be available at reception. They should also be available to other public areas as appropriate, e.g. meeting rooms to help deaf or hard of hearing people;
- **An alternative two-way communication system will be available in guest rooms** upon request to guests who are deaf or hard of hearing, e.g. an app, a text message on a phone, a smart TV program. There should be other systems such as visual or vibrating alarm, wake-up service; visual doorbell; hearing enhancement systems for the TV receiver in the guest room;
- **Features and equipment that benefit guests who are blind or visually impaired** should be available in guest rooms as needed, such as electronic door key with tactile noticeable marking; a do not disturb sign, in large letters and/or tactile font; switches with tactile markings; equipment for guide and assistance dogs, ie. bed and water bowl; tactile indicators for hot and cold water taps; hygiene products that are easy to manipulate with wet fingers and easy to distinguish with contrasting colors and easy-to-read fonts;
- **A range of assistive devices and equipment**, eg. wheelchairs, toilet seat covers, shower chairs, bath seats, adjustable beds, hoists, should be available for loan, upon prior request for guests with impaired mobility;

- **Events and activities for guests** in the accommodation facility should be organized and designed based on the **Universal Design Principles** to enable the participation of persons with different accessibility requirements or disabilities.

Accessibility in guest rooms. Accessibility is important in the design, layout and equipment of all types of guest rooms, as all guests can benefit from an accessible, comfortable and safe environment. Guests with disabilities, other than mobility impairments, e.g. such as people with sensory or cognitive impairments, as well as the elderly, children, people with temporary injuries or impairments, or people of tall or short stature, will benefit from using guest rooms that are designed and furnished with considerations for accessibility, following the principles of Universal Design.

The "accessible guest room" serves the needs of all users with any impairment and its specifications should be considered. Standard room types should be suitable for all other guests, but not necessarily for wheelchair users.

Guest rooms should have elements and features that improve accessibility, as many guests do not use the accessible room, but need design equipment that facilitates the accessibility of the room, e.g. people who are elderly, deaf people, visually impaired people. All the considerations that are described in detail below are desirable to be considered for all guest rooms, but of course mandatory for a certain number of rooms, and their implementation will depend on each specific case.

- **Visual contrast between elements and surfaces in the room should be provided** to facilitate orientation for all customers;
- **Elements, devices and controls**, e.g. switches, air conditioning controls and TV controls, should be **easy for any user**, without the need for wrist rotation or fine motor skills, e.g. firm grip;
- At the person's request, the guest room should have a **system that allows to see if a person is calling or knocking** on the door;
- **Floor surfaces should be solid**, e.g. a hard floor or carpet with a low height, to allow easy movement and avoid tripping, and also to alleviate allergies or breathing problems;
- **In guest room bathrooms, the floor surface should be slip resistant** when dry or wet;
- **In shower cabins and bathtubs, grab rails should be provided at an appropriate height**, for support when standing and to enable the safe transfer of persons;
- **Assistive devices for the hearing impaired**, e.g. vibrating or flashing alarm clocks, vibration pads, shall be provided upon request by persons, and shall be compatible with telephone and fire alarm systems. Additional electrical outlets for these devices should be provided near the bed;
- **Visual and audible alarm systems** should be available to warn people with hearing and sight impairments;
- **An accessible system should be in place to identify the various elements in the guest room** that may be difficult for the visually impaired to perceive, e.g. various control devices, hot and cold water tap;
- To organize **adjustments for the stay of the guide and assistance dog** in the guest's room;

- **The rooms identified as the quietest**, ie. on the upper floors, at the end of the hall away from elevators, amenities and common areas, should be **available to certain guests at their request**.

Accessible guest room. Many countries have regulations that require a certain percentage of guest rooms in hotels and other accommodation facilities, to be designed in a way to be accessible for guests with special needs, and especially for guests using wheelchairs. Such guest rooms, and the bathrooms therein, may be subject to certain specific requirements regarding their size, layout and provision of equipment, which are intended to ensure accessibility, comfort and safety for such guests. According to the standards, the following requirements and recommendations are important for such rooms:

- **An adequate number of accessible guest rooms should be provided**, e.g. at least 1 accessible room, with space for 2 suitable beds and a suitable accessible en-suite bathroom for persons using wheelchairs;
- The required percentage of accessible rooms for hotels or other accommodation may be subject to **national, regional or local legislation**,³⁹
- **When** in an accessible room, **it cannot be** ensured that there is accessibility in its own bathroom, such an **accessible bathroom should be located** a short distance from the guest room and on an **accessible route**;
- In accommodation facilities that have **rooms of different types and categories**, there should be a possibility to **ensure the accessibility of such rooms** in these different categories, e.g. accessible suites or accessible family rooms;
- Accessible rooms **should have an average character** and not be too exclusive, because if there is no specific request for the use of the room by guests with disabilities, that room should be available for use by other guests without disabilities. In that context:
 - **It is recommended that during the reservation process, such rooms are the last to be booked and filled** with non-disabled guests;
 - In some cases, accessible guest rooms **should be able to remove certain equipment, such as rails, handrails in the toilet**, to offer more comfortable use to guests without disabilities;
 - If hotels in certain areas have a limited number of accessible rooms for guests, and have a higher demand than what they can provide, they should, through cooperation with other hotels, or tourist information centers, to find out what accessible rooms they have, or other hotels, in order to make it easier for tourists to get such alternative accommodation.

Design and equipment of accessible guest rooms. Accessible guest rooms are designed with appropriate equipment, especially to meet the needs of users who use certain mobility devices. In addition, they require the following specific requirements and recommendations:

- **Adequate maneuvering space** should be provided to allow easy and convenient use of all facilities, including mini-bars, safes, coffee and tea making equipment, wardrobes and luggage and bathroom access;

³⁹ Regarding the regulation in the Republic of North Macedonia regarding this issue, a review will be given below in the text, p.136

- **Furniture**, including tables, seats, shelves, luggage bench, hanger, counters, should be accessible, in order **to facilitate access**, that is, have **adequate height and free space** for knees under them;
- Adequate clear space for maneuvering should be provided, if it is a double room, it should be on at least one of the long sides of one bed, and it should also be provided on the lower part of the beds;
- **The height of beds**, measured from the floor to the top of the mattress, whether or not it is padded, should be suitable to facilitate transfer from a wheelchair or other wheeled mobility device to the bed;
- **Beds should have clear space underneath to allow the use of a portable hoist.** Where possible, at least one accessible room, should be equipped with a hoist placed on the ceiling, which serves the bedroom and the bathroom;
- **Some accessible rooms, where possible, should be connected to a standard room**, in order to facilitate the assistance of the guest with a disability, providing separate **accommodation for the personal assistant in close proximity** to the person with a disability.

Bathrooms in accessible guest rooms and rooms with private bathrooms. In addition to the accessibility requirements for public toilets, in this case for bathrooms in accessible rooms, the following requirements and recommendations also apply:

- **At least 1 accessible room** should have access to its own accessible bathroom;
- Where no more than 1 accessible room with en-suite bathroom access can be provided at all, **the bathroom should be located a short distance** from the guest room and on an access route;
- If only 1 accessible room with its own bathroom is provided, it should have a **shower with a drain without a fence**;
- The provision of showers or bathtubs in accessible bathrooms of hotels and other accommodation facilities may be subject to national or local building regulations;
- If a bathtub is installed, **there should be enough space under the bathtub to operate a portable and or overhead hoist to transfer the guest in and out of the bathtub.** A suitable sitting edge should be provided on the long side of the tub, or there should be a larger area at one end to provide transfer support for any other user who needs to sit. **Grab rails are provided in shower cubicles** at an appropriate height for support when the guest is standing, to enable safe transfer;
- In the bathroom, **there should be enough space for approaching and maneuvering**, the taps, faucets, controls, etc., should be at an appropriate height. bathroom accessories;
- The accessible bathroom should **be provided with an emergency call system** that can be activated when the person is sitting or lying on the bathroom floor.

If the tourist accommodation also provides additional services, such as auditoriums, conference rooms, restaurants, shops, swimming pools, baths, hairdressers, entertainment, these public areas should be connected by an access route as indicated above for those elements.

Food and beverage services, catering facilities. In addition to accommodation, catering spaces such as restaurants, bars or other food and beverage outlets are an essential component of any tourist destination. For these spaces, accessibility should be considered in

terms of access to appliances, circulation spaces, toilets, equipment, furniture, communication and security.

Places of service. If there are special spaces that are used as places, service points for communication between the staff and the client, e.g. counters in bars or restaurants, they should comply with the requirements and recommendations described for reception areas, counters, desks and ticket booths

Type of service. When table service is not provided, or customers are required to make self-service food, beverage, condiment, and/or cutlery selections, **staff should be available to assist.**

Provision of information. The facility should provide information about its products, e.g. food, drinks, etc. in **accessible formats** in a way that allows everyone to browse the menu or products independently, e.g. with easily readable text in large print, Braille or other alternative formats such as web or mobile applications, images of dishes in the menu, etc. Where food is exposed, e.g. self-service restaurants, bars, cafeterias, showcases should allow people standing or sitting at different heights to have a good view of the products. Alternatively, a sample of the products may be requested to be presented to the customer. Displayed products should be clearly labeled and marked.

Provision of specific services. The offer in the facilities should include options **for people who have certain food intolerances**, e.g. with diabetes, with celiac disease, allergies to lactose, to crabs, etc. The restaurant should offer:

- **The possibility for staff to describe the menu** and its content;
- Possibility for the staff to describe the **presentation of the dishes**, ie. to facilitate orientation towards food for people who are blind or visually impaired;
- **Cutlery, glasses and glassware to be adjusted** according to requirements.

Dining room or utility room. Dining rooms, bars, lounges, restaurants or other areas where customers eat at a table or at counters should comply with the standards. **Accessible tables should be placed on the access routes** within the facility. If **toilets** are provided in the facility, **at least 1 should be accessible.** Where **self-service food areas are used, there should be adequate space to access what is on offer.** Most of the food selection, including condiments, as well as crockery, cutlery, glasses and glassware should be accessible to all people, including wheelchair users or people of short stature, etc., and of course should be offered and help. Table decorations and elements that hinder good visual communication should be removed at the tourist's request, e.g. vases, flowers, candles.

Tour operators and travel agencies can play an important role in helping all customers to choose travel arrangements that suit their accessibility needs. In addition to the basic requirements and recommendations related to the built environment, the relevant parts for transport and accommodation, the following requirements specifically apply to tour operators and travel agencies:

- **Sale places;**
- **Collecting and transmitting information before departure.** Tour operators and travel agencies should collect information about the specific needs of customers to help find a holiday destination or make travel arrangements that meet customer requirements and help the customer make an informed choice. A "Customer Care Requirements Form" can be used to obtain this information. Information should be transmitted securely, including to key personnel, transport suppliers and destination employees. Tour operators and travel agencies should consider the relevant data protection

implications, in terms of not keeping data longer than necessary and only using it for the purpose for which it was collected. Information regarding disability can often be seen as sensitive data and should therefore be treated with greater care.

- **Information about accommodation facilities.** To enable customers to make an informed choice of accommodation, travel agencies and tour operators should make all reasonable efforts to provide customers with information about the accessibility of accommodation. This can be done by contacting the hotel directly or if appropriate, by collecting data, including relevant measurements, e.g. within the Accessibility Guide, Property Information Form.
- **Other services.** To enable customers to make an informed choice about any other service provided, travel agencies and tour operators should make all reasonable efforts to provide customers with information about the accessibility of those services, e.g. excursions, transfer services, equipment rental, etc.

3.5.7. Annexes That Are Integral Parts of ISO 21902

Annex A refers to 7 principles and 29 guidelines for universal design

Universal design is based on 7 principles. Each of the principles has 4 or 5 descriptive guidelines. They are applied to evaluate existing designs, guide the design process, and educate designers and consumers about the characteristics of more usable products and environments.

The 7 principles of universal design and the 29 directions are:

Principle 1: Fair use, and includes:

- To provide the same means of use for all users, identical whenever possible, and equivalent when not possible;
- To avoid segregating or stigmatizing any users;
- Provisions for privacy, security and safety should be equally accessible to all users;
- To make the design attractive to all users.

Principle 2: Flexibility in use, covers:

- To ensure the choice of the methods of use;
- To provide access and equal opportunity for use with both right and left hands;
- To facilitate accuracy and precision of the user;
- To provide adaptability to the user's pace.

Principle 3: Simple and intuitive use, covers:

- Eliminating unnecessary complexity;
- Consistency of users' expectations and intuition;
- Ensuring the wide use of literacy and language skills;
- Sorting of information according to their importance;
- Providing effective, prompt and feedback during and after the completion of the task.

Principle 4: Perceptible information, covers:

- Using different ways of presenting the essential information without unnecessary superfluous things, eg. pictorial, verbal, tactile;
- Ensuring adequate contrast between essential information and its environment;

- Maximizing the "readability" of essential information;
- Distinguishing the elements in the easiest ways they can be described, ie. facilitating the giving of instructions or directions;
- Ensuring compatibility with different techniques or devices used by people with sensory limitations..

Principle 5: Fault tolerance, covers:

- Ordering elements to minimize hazards and errors: the most used elements, the most accessible; hazardous elements that have been eliminated, isolated or protected;
- To have warnings about dangers and errors;
- Ensuring safe functions in case of failure;
- Discouraging unconscious action in tasks that require attention.

Principle 6: Low physical effort, covers:

- To allow the user to maintain a neutral body position;
- Rational use of operational forces and opportunities;
- Minimizing repetitive actions;
- Minimizing constant physical effort.

Principle 7: Size and space for access and use, covers:

- Ensuring a clear line of sight of important elements for each user sitting or standing;
- Ability to have all the comfort components available for each user sitting or standing;
- Adapting to hand or handle size variations;
- Providing adequate space for the use of assistive devices or personal assistance.

Annex B. Tables for using the principles of Universal Design and Guidelines for designing tourism communication

Tourism service providers should use universal design principles and guidelines when designing and developing their products and services to communicate with customers. This Annex provides tables that link key universal design principles to communication design requirements for tourism products and services.

This set of 4 guide tables was developed to provide assistance to travel service providers in applying Universal Design principles and guidelines to their product and service development. The tables provide the key questions for the travel service provider's behavior through the basic usability design evaluation process. **The tables present the most relevant universal design principles in the following order:**

- **Principle 4: Perceptible information;**
- **Principle 2: Flexibility in use;**
- **Principle 3: Simple and intuitive use;**
- **Principle 5: Tolerance for error.**

Such an order is made, structured based on the steps that a customer would naturally follow to successfully use a product or service. By following the questions in the order given, the travel service provider ensures that they have considered the relevant usability of their products and services

There are two columns in each table. Column 1 outlines the guidelines for the Universal Design principle, and Column 2 asks questions about how the key Universal Design principles are incorporated into the relevant products and services. The answer to these questions helps

to evaluate how well universal design is integrated into the products and services provided by the entities.

The steps customers typically go through when interacting with information are:

Step 1: Perception: The client perceives the content with their senses: sight, hearing or touch, as seen in Table No. 2. Universal Design Principle 4 and its guidelines help identify how to present content in a way that can be easily perceived by customers.

Table No. 2. Guidelines for Principle 4 of Universal Design

Guidelines for Principle 4	Do the features of your product or service make the information easy to perceive?
4a. Use a variety of ways (visual, verbal, tactile) to successfully present essential information without clutter	Does your product or service offer the same content in different formats such as text, image and sound or on touch?
4b. Maximize the "readability" of essential information	Does your product or service offer the same content in different formats such as text, image and sound or on touch?
4c. Differentiate elements in ways that can be most easily described (ie, make it easy to give instructions or directions)	<p>Are instructions, help and support available in written and audio format?</p> <p>Is the help written in plain English?</p> <p>Is the document structured in a way that help topics to be easily found?</p> <p>Whether the functional elements can be easily described in written or audio format in order to provide assistance in use, for example instructions or help?</p>
4d. Ensure compatibility with different techniques or devices used by people with sensory limitations	<p>Can your customer easily change text, image size and volume to the extent that your product or service can be perceived by people with sensory limitations?</p> <p>Does your product or service offer ways to interact with assistive technologies or assisted communication devices?</p>

Step 2: Discovery: The customer finds relevant information. Universal Design Principle 2 and accompanying guidelines, as seen in Table 3, help identify how to present content in a way that allows the customer to easily identify the relevant content necessary to achieve their intended goal and task.

Table No. 3. Guidelines for Principle 2 of Universal Design

Guidelines for Principle 2	Do the features of your product or service make it easy for your customers to find information?
2a. Provide choice in methods of use	Does your product or service offer different routes (audio, visual, and tactile) to find and identify content that enables effective use of the product or service?
2b. Facilitate user accuracy and precision	Is the content presented in a clear, concise and well-structured manner? Does the way the content is presented make it easy for your customer to understand and use it the way it was designed?
2c. Provide customization at the user's pace	Does your product or service give the user enough time to complete a task or, if necessary, allow them to easily increase the time allowed?

Step 3: Understanding: The client interprets and understands how to use this content. Universal Design Principle 3 and its guidelines, as seen in Table no. 4, help identify whether their content is presented in a way that helps the customer understand how to use this information.

Table no. 4. Guidelines for Principle 3 of Universal Design

Guidelines for Principle 3	Do the features of your product or service make the content understandable?
3a. Eliminate unnecessary complexity 3e. Provide effective prompts and feedback during and after task completion	Are all options and functions required for use presented in a clear and concise manner? Are all the options and functions needed to use them easy to find or find?
3b. Be consistent with user expectations and intuition	Are the symbols and wording familiar to all users and internationally recognized so that the customer of the product or service understands them and can use them easily and promptly?
3c. Accommodating a wide range of literacy and language skills	Does the product or service offer a language selection or change feature? Does your product or service express content in plain English?
3d. Sort information according to its importance	Does the way the content is presented make it easy for the customer to identify the main features of the product or service?

3e. Provide effective prompts and feedback during and after task completion	Does your product or service provide effective prompting and customer feedback during use?
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Step 4: Use: Customers decide how to act on the information presented. According to Table no. 5, Universal Design Principle 5 and its guidelines help identify how to present information in a way that allows the user to make a decision about how to take an action.

Table No. 5. Guidelines for Principle 5 of Universal Design

Guidelines for Principle 5	Do the features of your product or service allow all customers to act on the information?
5a. Arrange the elements to minimize hazards and errors: the most used elements; most accessible; eliminated, isolated or protected hazardous elements	Are the most used and important elements (icons, images, buttons or text) the most obvious and accessible?
5b. Provide warnings about hazards and errors	Does your product or service provide warnings when the customer uses the content in a way other than intended, for example, if they make a mistake?
5c. Provide fail-safe functions	Does your product or service offer routes or options during its use to allow the customer to easily recover from errors?
5d. Discourage unconscious action in tasks that require attention	Does your product or service provide instructions and require confirmation before the customer commits to actions that are critical to safety or security, such as when it requires the customer's full attention? For example when entering an account number or credit card details

Annex C refers to **Color Contrast**⁴⁰ and has been elaborated on above.

Annex D refers to the Reception Counters

In hotel reception counters, bar counters, shop counters, ticket counters, information desks, etc., these parameters can be considered as a reference so that the counters can be used by as wide a range of people as possible.

Table no. 6 – Dimensions of an accessible counter

Main considerations	Dimensions (mm)
The width of the counter surface at the lowest height	≥ 1 000 mm
Minimum free height for the knees	700 mm
Free floor background for footrests	600 mm

⁴⁰ Pages 60-62

Counter height:	
— General area, for standing people	950 – 1000 mm
— Lower area	740 – 800 mm

What the parameters of Table no. 6 show, are visually shown below in Figure 4, which provides a possible solution for an accessible counter.

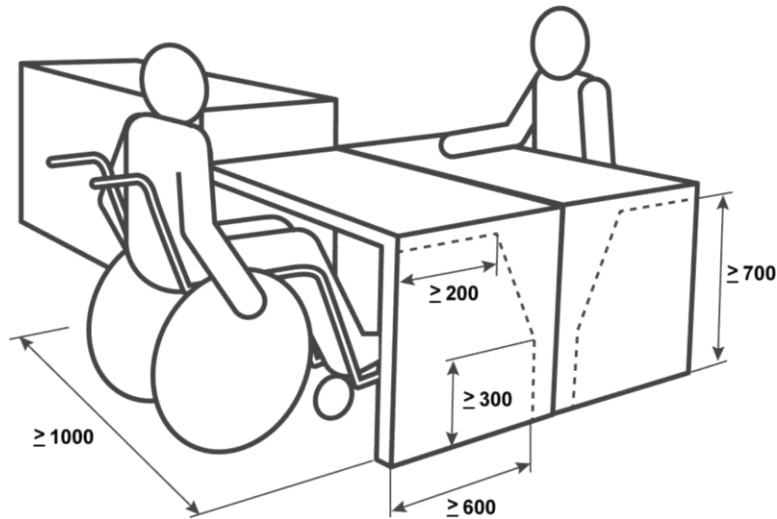


Figure 4. Example of an accessible counter

Annex E. Accessible public toilets

Although universal accessibility should be considered in all types of public toilets, this annex develops some specific considerations relating to the dimensions of toilets accessible to wheelchair users.

The maneuver that needs the most space is the access to the various elements: sink and toilet. For the sink, access should be frontal. For the toilet, the transfer access should be frontal, diagonal and lateral on at least one side.

Figure 5, the following examples of different possible solutions are shown graphically. It is recommended that the lateral approach be performed from both sides, but it can be done only from one side, when the former is not possible. In addition, different solutions are considered according to the location of the front door, on the smaller side of the toilet or on the larger side of the toilet.



Figure 5. Examples of distribution and maneuvering spaces in accessible public toilets

Annex F Accessible bedrooms in accommodation facilities

Maneuvering spaces

- **Access to the bathroom.** It should be possible to get in and out of the bathroom easily. The door opening space is not a good room to maneuver. To enable turning, there should be a free circular space, with a minimum diameter greater than 1.20 m, it is recommended equal to or greater than 1.50 m.
- **Access to the bed.** To allow for approaching and transferring to the bed, there should be a free space, at least on one long side of the bed, which is equivalent to a circular free space with a diameter equal to or greater than 1.20 m, it is recommended equal to or greater than 1, 50 m.
- **Access to other elements.** Easy access to other elements should be taken into account. important elements in the room, such as the wardrobe, the window, the table, the minibar, etc. For this, a free space of at least 1.20 m in diameter should be left.

- **General room to maneuver.** In any case, it is recommended to have at least one general maneuvering space in the guest room of 1.50 m, to facilitate full turning of the wheelchair, when necessary.

Spaces for access and transfers

Lateral space should be maintained to allow transfer from the wheelchair to the bed, shower or toilet. For this, a free space of at least 0.80 m x 1.20 m should be kept. It is important to have space in front of some elements, e.g. toilet, sink, shower chair, to allow access or frontal transmission.

All these requirements are graphically shown in Figure 6 below.

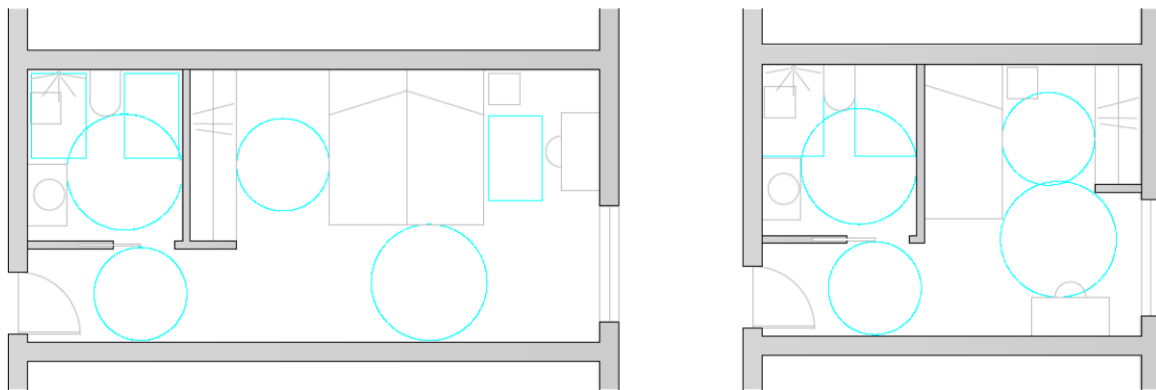


Figure 6. Examples of distribution and maneuvering spaces in double and single guest rooms

Access to elements and devices

It is important to have a physical and visual range of all the elements and devices of the room. For this, the following heights given below in Table 7 should be considered.

Table no. 7 - Recommended height of elements and devices in the guest room

Elements and devices	Height (mm)
Bed/toilet/shower seat	450 – 500 mm
Luggage bench	450 – 650 mm
Plugs and switches	800 – 1.200 mm
Cabinet shelves and drawers	800 – 1.200 mm
Toilet accessories: soap dish, toilet paper holder, hand dryer, etc.	800 – 1.200 mm
Holding bars	750 mm
Mirror and windows, bottom edge)	< 0,9 m
Lower free space, table, sink, etc.	> 0,7 m

Annex G. Information about the type of property where the accommodation is made

This Annex G takes the form of a kind of **Guide** with prescribed requirements.

Lodging properties should communicate the accessibility of available features in their properties.

General information

- Information relating to the **suitability of the property for customers with walking difficulties**;
- Information relating to the suitability of the property for customers who use a **wheelchair**;
- Information regarding modifications for **sensory impairment** and available provisions.

Reservation

- **Clear information on how to reach** the hotel by public transport, walking, driving and a description of the entrance area, e.g. a picture of the facade;
- **Details of any obstructions outside** the entrance to the accommodation which could obstruct wheelchairs, customers with mobility impairments or visually impaired customers;
- **Information regarding access to the hotel**, e.g. number of entrance stairs, ramp access, automatic entrance doors, width of entrance doors;
- **Parking for cars and availability of parking for people with disabilities** and charging facilities for electric mobility scooters;
- **Access to the reception** – number of steps, ramp access, elevator service;
- **Is a communication system available** at the reception, to improve hearing, e.g. hearing loop or mobile equipment;
- Are the reception and other common areas **non-smoking areas**;
- Are the reception and other common areas **free of plants that can cause allergic reactions**;
- Are no pets allowed, except guide and assistance dogs.

Elevators

- **Number of elevators** serving guest rooms, restaurants and other public areas;
- **What floors** do the elevators have;
- **Size of elevators, dimensions** to ensure wheelchair access;
- **Accessibility of elevator controls** for customers using wheelchairs;
- **Accessibility of elevators for the visually impaired**, controls with good contrast and Braille, or tactile markings and audio announcement on the floor where the elevator stops.

Public Toilets

- **Availability of wheelchair accessible toilets** and details of where they are located;
- **Width of doors**;
- Information on whether a **wheelchair can be placed next to the toilet** to enable transfer;
- **Availability of audio systems** that provide information for the visually impaired about the design of the toilets;
- If available, **the location of the toilet for assistance and guide dogs**;
- Are **emergency alarms linked to visual alarms** in toilets.

Pools

- **Location and accessibility of the pool area**;

- Access to the pool and **various means and options of entry**, e.g. via stairs or ramps;
- Do **the stairs have railings?**;
- **Is there a lift** to assist customers with special needs?;
- Information about the **location of showers and changing rooms**;
- **Availability of staff** to guide or show the way.

Restaurants, bars, lounges, entertainment venues

- **Accessibility to these areas**, especially for wheelchair users;
- Accessibility to the restaurant and bar areas;
- **Convenience of the restaurant for wheelchair accommodation**;
- **Number of stairs and/or ramps**;
- **Width of doors and entrance**;
- **Availability to assist visually impaired guests**, e.g. when there is a buffet;
- **Availability of menu**, price list in accessible formats, including large letters, Braille, available on website;
- Can the restaurant accommodate a **specific type of service** upon request, e.g. gluten-free, lactose-free and other restricted diet foods.

Other hotel facilities

- **Accessibility of the areas** in which the facilities are located, wheelchair access, etc.;
- Accessibility to facilities for **children's clubs and playgrounds**;
- **Fire safety, evacuation procedures** for customers with disabilities.

Sleeping accommodation – specially adapted guest rooms

- **Number and locations with information** on which floor they are on, of rooms accessible to wheelchairs;
- **Widths of all doors, heights** of sockets and switches;
- **Bed heights and available space** between the floor and bed base to accommodate a hoist;
- **Transfer space for a wheelchair** next to the bed;
- **Availability of bathrooms or showers**, and whether they are equipped with hand shower spray, reach controls, etc.;
- **Heights of toilet, bathroom, sink**; are grab rails installed next to the toilet, the bathtub, the transfer area in the toilet, bathroom, shower;
- **Wheelchair access to the balcony** or terrace from the guest room;
- **Accessibility to the floors** of the accommodation:
- **Are emergency alarms installed** in the guest room and bathroom?
- Availability of reliable **refrigerators for storing medicines**;
- **Height of cooking appliances** in accommodation where there is the possibility of own cooking;
- Can a **wheelchair fit under the sink?**
- **Evacuation procedures** for persons with disabilities from the room and whether visual alarms are linked to the building's emergency alarm
- Are **beds and bowls available for guide and assistance dogs?**
- **Are staff trained to orient a person who is blind or visually impaired** to the room and its amenities?
- Are visual alarms and/or vibrating alarms available for rent?
- Are guest rooms and common areas non-smoking?
- Are guest rooms free of plants that can cause allergic reactions?

Sleeping accommodation – standard rooms

- **Width of all doors;**
- **Information about stairs and floor surfaces;**
- **Availability of rooms on the ground floor;**
- **Availability of reliable refrigerators on the premises,** e.g. for storing medicines;
- **Fire safety and availability of audible or vibrating alarms** and evacuation procedures.

Hotel grounds and beach

- **Terrain contours,** e.g. level or hilly;
- **Open viewing areas or seating and meeting areas.**
- **Details of paths and lighting;**
- **Accessibility to and from the beach,** e.g. are there stairs, ramps, walkways, beach mats?
- Staff are instructed to allow guide and assistance dogs on the beach and offer them shade, a bowl and water.

Evacuation

- Availability of **accessible evacuation routes;**
- **Availability of help in emergency situations;**
- **Training of staff** to provide assistance.

Accessibility information for key areas close to the hotel

- **Nearby parks, pedestrian boulevards or footpaths,** and whether they are accessible for walking to and from them back to the hotel.

Annex H. International Air Transport Association-IATA codes

Airline systems transmit information about assistance needs using **4-letter codes**. Each code can cover quite a wide range of assistance and provide information outlining the different types of assistance covered. The codes can be used by travel agencies in determining the correct codes and can be given to consumers so that they can check the code that was previously used. In some cases, more than one code may be required, e.g. if a wheelchair user is also visually impaired.

4. The Regulation of the Republic of North Macedonia in The Area of Accessibility, and The Relevant Regulations for Accessibility in Tourism

It must be emphasized that the regulation of the Republic of North Macedonia in this area is very comprehensive, and that *de lege* meets all the prescribed criteria, at the global, European level, and to a large extent from the international standards. No miracle will be said if it is repeated that what is missing the most in the Republic of North Macedonia is the correct and consistent implementation of the regulations that exist in any area, and the same applies to this topic to which this Study is dedicated.

Considering them according to legal logic and connection, for the purposes of this study, the documents, regulations, acts will be reviewed below, starting from the highest legal act in a country - that is the Constitution, then the legal acts, and finally the by-laws. Documents are analyzed according to legal hierarchy, and order, and those with more relevant provisions related to accessibility are given greater elaboration. For the purposes of this Study, a review is given to:

- The Constitution of the Republic of North Macedonia, Official Gazette of the Republic of North Macedonia, no. 6/2019
- National Strategy for The Equalization of Persons with Disabilities in the Republic of North Macedonia 2010-2018
- Concluding observations on the initial report of the Republic of North Macedonia, UN Committee on the Rights of Persons with Disabilities, October 29, 2018
- Annual Report on the Work of the National Coordinating Body for the Implementation of the UN Convention on the Rights of Persons with Disabilities under the Government of the Republic of North Macedonia for 2019, February 2020.
- Action Plan for 2021 for the implementation of measures from the UN Convention on the Rights of Persons with Disabilities, National Coordinating Body for the Implementation of the UN Convention on the Rights of Persons with Disabilities under the Government of the Republic of North Macedonia, 2021.
- Law on ratification of the convention on the rights of persons with disabilities and the optional protocol to the convention on the rights of persons with disabilities, Official Gazette of the Republic of Macedonia, No. 172/2011
- Construction Law, Official Gazette of the Republic of North Macedonia, No. 130/2009, 124/10, 18/11, 36/11, 54/11, 13/12, 144/12, 25/13, 79/13, 137 /13, 163/13, 27/14, 28/14, 42/14, 115/14, 149/14, 187/14, 44/15, 129/15, 217/15, 226/15, 30/ 16 , 31/16, 39/16, 71/16, 132/16, 35/18, 64/18 and 168/18, 244/19, 18/20, 279/20
- Law on urban planning, Official Gazette of the Republic of North Macedonia, no. 32/20
- Law on social protection, Official Gazette of the Republic of North Macedonia, no. 104/19, 146/19, 275/19, 302/20, 311/20, 163/21, 294/21
- Child Protection Law, Official Gazette of the Republic of North Macedonia, no. 23/13, 12/14, 44/14, 144/14, 10/15, 25/15, 150/15, 192/15, 27/16, 163/17, 21/18, 198/18, 104/ 19, 146/19, 275/19 and 311/20, 294/21
- Law on Prevention and Protection from Discrimination, Official Gazette of the Republic of North Macedonia, no. 258/2020
- Law on tourism activity, Official Gazette of the Republic of North Macedonia, no. 2/2004, 89/2008, 12/2009, 17/11, 47/11, 53/11, 123/12, 164/13, 27/14, 116/15, 192/15, 53/16, 31/ 20
- Law on catering activity, Official Gazette of the Republic of North Macedonia, no. 62/04, 89/08, 115/10, 53/11, 141/12, 164/13, 187/13, 166/14, 199/14, 129/15, 192/15, 39/16, 53/ 16, 71/16, 31/20
- Law on Basic Education, Official Gazette of the Republic of North Macedonia, no. 161/19, 229/20
- Law on Employment of Disabled Persons, Official Gazette of the Republic of North Macedonia, No. 44/2000, 16/2004, 62/2005, 113/2005, 29/2007, 88/2008, 161/2008, 99/2009 /11 , 129/15, 147/15, 27/16, 99/18, 103/21
- Law on Labor Relations, Official Gazette of the Republic of North Macedonia, No. 62/2005, 106/2008, 161/2008, 114/2009, 130/2009, 50/10, 52/10, 124/10, 47/11 , 11/12, 39/12, 13/13, 25/13, 170/13, 187/13, 113/14, 20/15, 33/15, 72/15, 129/15, 27/16, 120 / 18, 110/19, 267/20, 151/21, 288/21
- Law on Disability Organizations, Official Gazette of the Republic of North Macedonia, No. 89/2008, 59/12, 23/13, 150/15, 27/16, 317/20

- Law on the use of sign language, Official Gazette of the Republic of North Macedonia, no. 105/2009, 150/15, 30/16, 103/21 Rulebook on the minimum technical conditions of facilities for performing tourist activities, 16/2006
- Rulebook on minimum technical conditions for carrying out tourist activity, Official Gazette of the Republic of Macedonia no. 16/2006
- Rulebook on minimum technical conditions for catering activities, Official Gazette of the Republic of Macedonia, no. 16/2006, 44/2013
- Rulebook on conditions for the categorization of facilities for catering activities, Official Gazette of the Republic of Macedonia, no. 16/2006, 87/12, 41/13
- Rulebook on the technical characteristics and dimensions of the path of movement of persons with physical disabilities and persons with visual impairment, Official Gazette of the Republic of Macedonia, No. 17/2015
- Rulebook on the method of ensuring unhindered access, movement (horizontal and vertical), stay and work of persons with disabilities, to and in, buildings with public and business purposes, buildings for housing in residential buildings, as well as buildings with residential and business purposes, Official Gazette of the Republic of Macedonia, No. 17/2015
- Rulebook for urban planning, Official Gazette of the Republic of North Macedonia, no. 225/2020

4.1. Constitutional Provisions Related to Accessibility

The constitution, as the highest legal act in a country, regulates the foundations of the socio-political, economic and legal system of a country in the most general way. Thus, in terms of accessibility, the Constitution has intermediate provisions that refer to accessibility, and are related to the basic freedoms and rights of man and citizen.

The Constitution of the Republic of North Macedonia is one of the most democratic constitutions in the world, although it was adopted in 1991, and has been amended and changed several times, including the last changes in 2019, it remains one of the most democratic constitutions, because more than 1/ 3 of all its provisions refer to human freedoms and rights, which absolutely include the rights of persons with disabilities.

One of the most important articles of the Constitution is its Article 8, which contains the **fundamental values** of the constitutional order, and those provisions are a kind of basic postulates of the organization of the state, and through them you can absolutely see what the concept of organization in the Republic of North Macedonia. There are 11 core values and 1 more value given at the end that wraps them all up. The core values are:

- **The basic freedoms and rights of man and citizen recognized in international law and determined by the Constitution**, as the first fundamental value here is seen the basis of the Constitution, and the orientation of the constitutional order towards respect for all freedoms and rights, which flow from the highest international norms and standards. What was analyzed earlier in this Study, within the framework of the acts of the UN, the Council of Europe, the EU, as well as international standards, absolutely fits into what the Constitution of the Republic of North Macedonia promotes;
- **The free expression of national affiliation**. Adequate and fair representation of citizens belonging to all communities in state government bodies and other public institutions at all levels

- **The rule of law.** Regarding this third value, the laws must be in accordance with the Constitution, and all other regulations with the Constitution and the law. This principle required the absolute validity of all legal acts of law. Everyone is obliged to respect the Constitution, laws and by-laws, as well as all procedures of authorities, institutions and other forms of organizations that make decisions, this automatically also applies to persons with disabilities, who in exercising their rights should absolutely receive support from the institutions that should make their decisions in accordance with this principle;
- **The division of state power into legislative, executive and judicial,** as one of the greatest benefits of modern democratic systems, where all authorities are independent, separated from each other, with appropriate control and balancing mechanisms;
- **Political pluralism and free, immediate and democratic elections.** Pluralism is realized through the basic voting rights of all citizens, so that both active and passive voting rights have the obligation of the state authorities to make them absolutely available to all citizens, regardless of their characteristics, and in that context, this also applies to persons with disabilities. who should be provided with accessibility in the process of voting in the various forms of elections, as well as through the forms of direct democracy, referendum, citizens' initiative, etc. They should be equally provided with the exercise of their right to vote, that is, to vote, but also to be voted for. Political parties include in their programs and activities the demands of various organizations of persons with disabilities, and they are partners with them in realizing their rights. And at the global level, the rights of people with disabilities have been raised to a very high level in terms of setting, but, although it is the third decade of the XXI century. However, much still needs to be done in the world to realize their rights.
- **The legal protection of property,** as a sacred and inviolable right, the right to property must be protected equally for all, without any discrimination;
- **The freedom of the market and entrepreneurship,** as a principle on which the system of free and market economy is based, provides the opportunity for all market subjects, based on the basic economic regularities, to decide on their business activities, in accordance with supply and demand. An equal legal position is ensured for all subjects in the market, measures are taken against monopolistic position and monopolistic behavior in the market, and the freedom of the market and entrepreneurship can be limited by law only for the sake of defense, preservation of nature, the environment or human health. Thus, in the context of tourism as an activity, all stakeholders involved in tourism must see opportunities by increasing the accessibility of all services and products they offer to a much wider circle of people, to enable themselves to expand their potential for appropriate growth of their businesses, and of course that people with disabilities are one of the most important targets for attraction, and therefore all these instruments that are analyzed in this Study, as well as these projects that treat this activity in general, go in the direction of increasing accessibility of tourist services and products, all tourist stakeholders, but also all citizens, benefit;
- **Humanism, social justice and solidarity,** as a principle deeply connected to humanity, love and care for the human being, as well as human dignity, expressed through various degrees of solidarity, both at the global level and at the micro level, when

given love, help, solidarity to every individual in the country, because every human life matters, and we have to fight for everyone! In this context, care for persons with disabilities in all aspects should be supported and intensified in the widest possible range of aspects everywhere;

- **Local self-government**, as a type of so-called the fourth government in the state, through appropriate programs, projects, subsidies, donations for persons with disabilities⁴¹, provides the opportunity for their greater inclusion in all levels of decision-making;.
- **The arrangement and humanization of space and the protection and improvement of the environment and nature**. This means that in addition to the requirement to raise environmental standards and sustainable development, the arrangement and humanization of space, in terms of urban planning, should enable persons with disabilities, through specific requirements, provisions and standards, to include them as much as possible. in all processes of social life, and practically by determining them in accordance with all international norms and standards, to take the widest possible account of the accessibility of all objects, as well as the provision of accessible services and products, in this context and those in the area of tourism and hospitality;
- **Respect for the generally accepted norms of international law**, a value that is fulfilled in the regulation of the Republic of North Macedonia, through the appropriate implementation of various international conventions, declarations, pacts, standards, through the appropriate ratification of those instruments, or through the appropriate approximation of the regulation of the Republic North Macedonia with the international, that is, through the adoption of regulations in the Republic of North Macedonia that include the incorporation of international norms, standards and requirements, especially those of the EU.
- Finally, this Article 8 ends with the most democratic norm that can be given in a document and which says that **in the Republic of North Macedonia everything that is not prohibited by the Constitution and the law is free**, so such legal latitude is given to everyone, which can really be desired by all people in this world, means that everything that is not forbidden is considered permitted and free, and since very few things are forbidden, a huge percentage of things and freedoms are allowed. It would be very different, although it might seem the same at first glance, if this provision were to say that everything that is not allowed by the Constitution and the law is prohibited in the Republic of North Macedonia! Someone will say it's a play on words, but it's not! It is not the same to allow everything that is not prohibited as to prohibit everything that is not allowed, there is a big difference both in terms of the width and in terms of the character of the state.

Article 9 of the Constitution refers to the **right to equality** of all citizens, and according to it, the citizens of the Republic of North Macedonia are equal in freedoms and rights regardless of gender, race, skin color, national and social origin, political and religious belief, property and social position. Citizens are equal before the Constitution and laws. This provision affords all people equality regardless of anything and without any discrimination on any grounds, including any form of disability.

⁴¹ Examples of the positive aspects of the local government's contribution to meeting the needs of persons with disabilities are given in the section on Conclusions and recommendations on p.185

Art. 11 determines that **the physical and moral integrity of a person is inviolable** and that any form of torture, inhuman or degrading behavior and punishment, as well as forced labor, is prohibited, which means that human dignity must be equally respected for all people without exception.

Art. 15 guarantees **the right to appeal** against decisions made in a procedure in the first instance before a court. The right to appeal or other type of legal protection against individual legal acts adopted in a procedure in the first instance before a body of the state administration or organization and another body exercising public powers is regulated by law. This means that all persons are guaranteed the opportunity to use the right to appeal when they believe that their rights have been violated, and by addressing and appealing certain acts through the principle of two-tiered, they can request a review of the acts that they consider to be threatening their rights in any way and by any entity.

Art. 16 refers to **freedom of belief, conscience, thought and public expression of thought**, as well as freedom of speech, public performance and public information. Free access to information, freedom to receive and transmit information is equally guaranteed for all, which means that for persons with disabilities it must be done in an appropriate accessible format, whether through audio, visual techniques, or through the use of certain technical assistance, or help from other experts, as well as through the use of appropriate letters, Braille, tactility in certain designs, etc.

The security, secrecy and protection of personal data as a principle is regulated in Art. 18 according to which the security and secrecy of personal data are guaranteed. Citizens are guaranteed protection from violation of personal integrity, which results from the registration of information about them through data processing. The data on persons who have any kind of disability of any kind, whether it is sufficiently visible or not, is particularly sensitive, disability is a personal attribute, and must be taken into account by all institutions for the protection of personal data. In the Republic of North Macedonia there is a good regulation in that regard.

Art. 20 all citizens are equally guaranteed the **freedom of association** for the purpose of achieving and protecting various goals, political, economic, social, cultural and other rights and beliefs. Citizens can freely establish associations of citizens and political parties, access them and from them to perform. According to this, it means that everyone can form certain associations of citizens, which protect the rights of persons with disabilities, for a legally legitimate and legal interest. In the Republic of North Macedonia, there are a large number of such associations that actively participate in social life, and through their appropriate involvement in the processes that affect their interest groups, contribute to improving the position of all persons with disabilities.

Enabling and protecting the right to vote is guaranteed in Art. 22 and 23 of the Constitution, according to which, every citizen over the age of 18 acquires suffrage. The right to vote is equal, general and immediate and is exercised in free elections by secret ballot. Persons who have been deprived of their business capacity do not have the right to vote. Every citizen has the right to participate in the performance of public functions. These provisions give great freedom to all citizens to demand that the state system and apparatus do everything possible to exercise their right to vote. Efforts are being made in this regard in the Republic of North Macedonia, but a lot still needs to be done, because there are still inaccessible voting places for people with disabilities, there are still public facilities that are inaccessible, and of course private entities must also take them taking into account the accessibility requirements of their services and products for the largest possible circle of people. There is still a lot of work to be

done, and a lot more to be done, for greater accessibility, but it is a process that never ends, because it always gives enough latitude to achieve full equality and equity for all persons.

Art. 24 states that every citizen **has the right to submit petitions** to the state authorities and other public services and to receive an answer to them. The citizen cannot be held accountable, nor suffer harmful consequences for the views expressed in the petitions, unless he has committed a crime with them. These provisions mean that all persons have the opportunity to request the realization of their rights by submitting petitions to the authorities, public services and other entities, and all persons should use this regardless of any differences between them.

Every citizen is guaranteed **respect and protection of the privacy** of his personal and family life, dignity and reputation, according to Art. 25 of the Constitution, which of course also applies to all persons with disabilities!

According to Art. 27, every citizen of the Republic of North Macedonia has **the right to move freely** in the territory of the state and freely choose his place of residence. Every citizen has the right to leave the territory and return to the country. The exercise of these rights can be limited by law, only in cases where it is necessary for the purpose of protecting the security of the state, conducting criminal proceedings or protecting people's health. And according to these provisions, freedom of movement and accessibility must be made available to everyone, daily and in all fields.

The economic, social and cultural rights of people are part of the basic human freedoms and rights.

According to Art. 32, everyone has **the right to work, free choice of employment, protection during work** and material security during temporary unemployment. Every job is available to everyone, under equal conditions. Every employee has the right to an adequate salary. Every employee has the right to paid daily, weekly and annual vacation. Employees cannot waive these rights. This means that all persons, regardless of their characteristics or disabilities, should have access to every workplace under equal conditions. Through the legal regulation, certain sectors are even given the so-called examples of protectionism, that is, certain privileges are given to persons who employ persons with disabilities, which is a good measure, but it must be accompanied by an even more system of measures, which will be present in every possible area of social life.

According to Art. 34, citizens have the **right to social security and social insurance** established by law and collective agreement, which means that they are provided with various measures that exercise and protect their social rights, on an equal basis, and for the vulnerable categories of citizens, provided a multitude of measures and instruments in that direction.

One of the essential articles that refers to persons with disabilities is Art. 35 of the Constitution according to which **the state takes care of the social protection and social security of the citizens in accordance with the principle of social justice**. It guarantees the right to assistance to infirm and citizens with disabilities. The state provides special protection to persons with disabilities and conditions for their inclusion in social life. According to this, one of the basic obligations of the state, in addition to others, is to provide special protection for persons with disabilities and their inclusion in all aspects of social life, this is also very important for the need to exercise all rights for accessibility of persons with disabilities and for tourist services and products.

The right to health care of all citizens is regulated in Art. 39, according to which, every citizen is guaranteed the right to health care. The citizen has the right and duty to protect and improve his own health and the health of others, which means that all persons, regardless of

their characteristics, must have the right to health care, and enabling the improvement of health and living conditions.

Art. 40 gives the state the task of **taking special care and protection of the family, legal relations in marriage, family and cohabitation**. An important provision for the rights of persons with disabilities is that parents have the right and duty to take care of supporting and raising their children, and children are obliged to take care of their old and infirm parents. According to the broader understanding, the elderly also belong to the category of persons with disabilities and therefore, in addition to the micro-level that children should take care of them, the state system should also take care of such persons through appropriate institutions. The state specifically **protects motherhood, children and minors** according to Article 42. Also according to this, a person younger than 15 years of age cannot be employed. Minors and mothers have the right to special protection at work. Minors may not be employed in jobs that are harmful to their health and morals. Both parents and children, in certain situations, are treated as persons with a certain disability, e.g. in mobility, due to the need for wheelchairs, slowness in movement, etc., and therefore, the needs of these people for adequate accessibility in tourist facilities, facilities related to tourism, catering, culture etc., must also be taken into account.

According to Art. 44, **everyone has the right to education** and education is available to everyone under equal conditions. Primary and secondary education are compulsory. This means that for all persons the state is obliged to provide appropriate conditions so that all persons can use that right, that is, inclusion in education enables all persons with disabilities to be able to attend primary and secondary education, which is mandatory according to the constitution, to attend these forms of education.

The freedom of scientific, artistic and other types of creativity is guaranteed. Rights arising from scientific, artistic or other types of intellectual creation are guaranteed. The state encourages, helps and protects the development of science, art and culture. It encourages and helps scientific and technological development. The state encourages and supports technical culture and sports. These provisions are in Art. 47 of the Constitution, they give a breadth in the possibility for all persons to create in science, art and to create their own works. Also, through the development of science, art, culture, technological development, as well as sports, the state should provide accessibility to certain institutions for persons with disabilities who are engaged in such activities.

Art. 50 is part of the **guarantees of basic freedoms and rights**, in the sense that every citizen can invoke the protection of the freedoms and rights established by the Constitution before the courts and before the Constitutional Court of the Republic of North Macedonia in a procedure based on the principles of priority and urgency. Judicial protection of the legality of the individual acts of the state administration and other institutions exercising public powers is guaranteed. The citizen has the right to be familiar with human rights and basic freedoms and to actively contribute, individually or together with others for their promotion and protection. According to this, the realization of all forms of freedom and rights is guaranteed to everyone equally, on all grounds.

Regarding the **possibility of limiting some freedoms and rights** of citizens, it is determined in Art. 54, according to which the freedoms and rights of man and citizen can be limited only in cases determined by the Constitution. The freedoms and rights of man and citizen may be limited during a state of war or emergency according to the provisions of the Constitution. Restriction of freedoms and rights cannot be discriminatory on the basis of gender, race, skin color, language, religion, national or social origin, property or social position. The restriction

of freedoms and rights cannot refer to the right to life, the prohibition of torture, inhumane and degrading treatment and punishment, the legal certainty of criminal acts and punishments, as well as the freedom of belief, conscience, thought, public expression of thought and belief. This means that there can be no discriminatory limitation of any freedoms and rights, in any situation, even for persons with disabilities.

According to Art. 56 **all natural treasures, plant and animal life, goods in general use, as well as objects and facilities of particular cultural and historical significance** determined by law are **goods of general interest** to the state and enjoy special protection. The state guarantees the protection, advancement and enrichment of the historical and artistic wealth of the Macedonian people and nationalities, as well as the goods that make it up regardless of their legal regime, which means that this heritage must be equally accessible to all persons and persons with disabilities, because they are an integral part of every nation.

The institution of the **Ombudsman**, which is elected by the Assembly of the Republic of North Macedonia, for a period of 8 years with the right to another election, protects the constitutional and legal rights of citizens who have been violated by the state administration bodies and by other bodies and organizations that have public powers. This institution, especially in other European countries where it is known as the Ombudsman, is very important and is given special importance, and the citizens trust it and use its mechanisms, this must be done more in the Republic of North Macedonia.

4.2. National Strategy for Equalizing the Rights of Persons with Disabilities 2010-2018

In the Republic of North Macedonia, the last strategic document that was adopted, which refers to the rights of persons with disabilities, is the National Strategy for the Equalization of the Rights of Persons with Disabilities⁴² 2010-2018, 2010-2018, and therefore its most significant provisions will be analyzed in the following lines.

The strategy represents a plan of numerous activities that derive from the principles of the Convention⁴³ on the Rights of Persons with Disabilities adopted by the UN in 2006 and ratified in the Republic of North Macedonia in 2011. The Convention regulates the rights and needs of persons with disabilities, as well as the participation of the main actors and participants in the realization of the activities, such as the competent ministries, institutions and civil organizations.

The intention of the Strategy was to be closer to the needs of the users, and its motto is "Nothing for us, without us".

In the Republic of North Macedonia, the process of inclusion of students with special educational needs is based on positive world experiences adapted to the North Macedonian context. In addition to revitalizing the general democratization and humanization, the general commitment "education for all", which means the application of the fundamental right to education, is emphasized more and more loudly.

This revised National Strategy was aimed at providing a comprehensive working framework that was to be flexible and adaptable in order to ensure the rights and meet the needs of persons with disabilities, to serve as a map for policy makers, to enable them to design, adapt, refocus and implement appropriate plans, programs and innovative projects.

⁴² This terminology is used here, as it provides an authentic treatment of the Strategy, which uses the term "инвалидност", not "попреченост" (The former is still used, but the latter is being promoted as more appropriate. The English term for both is "disability".)

⁴³ Which was more elaborated in the section 1.1., on p.7

The terminology used in the Strategy is in accordance with the UN Convention, and includes the terms:

- **Disability;**
- **Persons with Disabilities;**
- **Medical approach, model of disability;**
- **Social approach, model of disability;**
- **Specific needs assessment system;**
- **Accessibility.**

Regarding the **Goals⁴⁴ of the Strategy**, it can be said that the strategic goal set by this document is **the advancement of the position of persons with disabilities** to the position of equal citizens who enjoy all rights and responsibilities. It provided support to organizations of persons with disabilities, their participation in decision-making on issues for persons with disabilities. The modernization and revision of the strategy had a common goal:

- **Harmonization of all action policies in the area for the protection** of persons with disabilities with **domestic and international standards;**
- Monitoring and incorporating all trends in order to **enable accessibility in all spheres** of living and activities of persons with disabilities;
- **Continuous monitoring of the development of international standards** as a way of creating the highest rate of modern protection and accessibility to all rights and their realization without discrimination;
- **The upgrading of the domestic legal framework** in the area of protection of persons with disabilities;
- Creation of the **conditions for implementation** of the legislation and monitoring of its application;

The tasks of the Strategy were, through the implementation of the **action plans for its realization on an annual level**, to define the goals, measures and activities that contribute to social inclusion and the approach based on human rights for persons with disabilities and improving their position.

Also, through the action plans, the responsibilities of all relevant factors involved in the process should be defined, as well as the time frame of implementation should be specified.

The general task⁴⁵ of the Strategy was until 2018 to achieve the following:

- **Multi-ministerial approach** to find appropriate solutions for improving human rights, accessibility and inclusion of persons with disabilities;
- **Developing effective legal protection**, through developing and implementing plans for the prevention and prevention of discrimination against disabled persons, as well as plans for sensitizing society through raising awareness for nurturing equality, in relation to Art. 5 of the UN Convention on the Rights of Persons with Disabilities;

⁴⁴ Regarding the set goals, I must emphasize that they are really well conceived and are essential for improving the position in this sphere.

⁴⁵ Also, in terms of the conceptualization of the tasks, these tasks are quite solidly set, and for some of them there is an appropriate implementation, but, of course, there is still a lot to be done.

- **Availability of services:** social, health and other services that are based on the rights and needs of the users, and are in accordance with modern international accepted standards for assessment of disability and needs;
- **Development of policies, measures and applied programs,** especially in the field of education, employment, housing, which will give people with disabilities equal opportunities and encourage them to independence, personal development and active life in all areas;
- **Accessibility of persons with disabilities in the overall social environment,** accessibility to public transport, information, communications, services for the public, through the development and implementation of a plan for the removal of barriers and the construction of accessible facilities and services;
- **Ensuring standards for quality of life** and social security.

The general principles on which the Strategy was based are taken from the UN Convention on the Rights of Persons with Disabilities, namely:

- **Respect for inherent dignity,** individual autonomy, including freedom of choice and independence of persons;
- **Non-discrimination;**
- **Full and efficient participation and involvement** in all spheres of social life;
- **Respect for differences** and acceptance of persons with disabilities as part of human diversity and humanity in common living;
- **Equal opportunities;**
- **Accessibility,** in terms of removing all kinds of barriers, building and nurturing accessibility and equal opportunities for people with disabilities;
- **Gender equality;**
- Appropriate concept for **children with disabilities.**

Regarding the content of the Strategy, methodologically it includes a description of the situation, setting goals, setting a special goal, as well as proposing appropriate measures and assigning appropriate authorities to undertake those measures, in 17 areas, namely:

- Family and personality development;
- Prevention;
- Health care, habilitation and rehabilitation;
- **Availability of services and aids;**
- Education;
- Professional and work orientation and employment;
- Social protection;
- **Housing, mobility and accessibility;**
- Legal protection and protection from violence and abuse;
- Informing, communicating and raising the level of consciousness;
- **Participation in cultural life;**
- **Recreation and sports;**
- Information and research;
- Participation in political and public life;
- International cooperation;
- Statistics and data collection;

- Monitoring and evaluation of the Strategy.

In this Study, only those parts that correlate with accessibility directly, as methodologically set out in the Strategy, will be fully reviewed, although all parts are directly or indirectly more or less related to accessibility.

Availability of services and aids

This section refers to services related to persons with disabilities and the provision of assistive devices that are intended to facilitate the full participation of persons with disabilities in society, in accordance with the provisions on Personal Mobility from Art. 20 of the UN Convention on the Rights of Persons with Disabilities.

According to the Strategy, people with disabilities should be given **access to the entire social environment**, such as **public transport, information, communications and services for the public**. It had to be realized through the annual action plans, the social model that understands accessibility not as an act or condition but as freedom of choice of opportunities. The problem does not refer only to **physical barriers**, but requires the creation of a **policy that develops systemic solutions**, where the term accessibility is only an element of the overall right to accessibility and participation of all citizens, including persons with disabilities. Barriers according to the social model are not only architectural but also information-communication and social-economic.

A special goal of the Strategy was the consistent application of the regulations relating to the **mandatory application of accessibility standards**.

The strategy proposed a number of **measures in that direction**, which were to be undertaken by the competent institutions, namely: the Ministry of Transport and Communications, the Ministry of Information Society, the Ministry of Labor and Social Policy and the Ministry of Education and Science in cooperation with all other ministries and others bodies of the state administration and administrative organizations. Those measures⁴⁶ referred to:

- **Creation of services based on meeting the needs of persons with disabilities** for their full inclusion in **personal, family, educational and professional life**;
- **Supporting research, development, production** and application of new **information and communication technologies** and their availability to persons with disabilities;
- Developing mechanisms for **accessibility to information and communications** for persons with disabilities;
- The state, through its legal system, ensures the **development, production, supply and maintenance of aids** for persons with disabilities;
- The state should adopt **regulations** that should **ensure physical, information and communication accessibility** for persons with disabilities, through the introduction of certain standards and regulations for the removal of physical and any other type of barriers.

Housing, mobility and accessibility

Housing, mobility and accessibility are basic prerequisites for the implementation of all activities in the daily life of persons with disabilities and their inclusion in the community. For

⁴⁶ Although they look nice, a good part of these measures have not been implemented, and for that there are subjective obstacles, as well as objective obstacles for the state. However, all commitments from the measures should be implemented regardless of the deadline!

all these areas, the need for **development of standards** was perceived. Requirements in the segment of accessibility, for the **construction of roads with lowered curbs, intersections with sound traffic light devices, with tactile surfaces for the blind, as well as sound and visual announcements in public transport vehicles, with the possibility of the blind person using a guide dog** in all means on public transport and entrance to all buildings for public purposes. In city and intercity public transport, the goal was to introduce adapted low-floor buses, as well as special attention to the introduction of **adapted intercity bus routes. The availability of public transport** on all lines, accessibility of the timetable and vehicles and provision of clear and accessible information at the terminals and in the vehicles is necessary.

During the implementation period of the Strategy, one of the most important tasks was to **promote "Universal Design"**, to design products, environments, programs and services in such a way that they can be used by all people to the greatest extent possible, without the need for adaptation.

A special goal was to ensure accessibility and affordability in all segments of living.

The bearers of measures in this direction should have been: the Ministry of Transport and Communications, the Ministry of Education and Science and the Ministry of Information Society in cooperation with local self-government units, which should focus on the following **measures**⁴⁷:

- Establishing an **accessible environment for people with disabilities** by applying the principles of universal design, thus avoiding the creation of new obstacles;
- Enabling the **accessibility of transport** for all persons with disabilities;
- Development of **educational programs** related to the application of Universal Design;
- Ensuring **access to information and communications** for all persons with disabilities;
- Ensuring **application of modern technologies**;
- Establishing a **system of assistance in solving the housing issue** for persons with disabilities.

Participation in cultural life

In order for persons with disabilities to participate in cultural activities on an equal basis, the state should strive to provide conditions in which persons with disabilities should be able to present their creative, artistic and intellectual abilities.

A special goal was the realization of **full participation of persons with disabilities in cultural and entertainment life.**

The Ministry of Culture in cooperation with local self-government units was in charge of undertaking the following **measures**:

- **Adjustment of legal regulations** to more effectively implement the inclusion of persons with disabilities in cultural life and activities;
- Enabling the **development and affirmation of the creative possibilities** of persons with disabilities and enabling them to participate equally in cultural life, together with other participants;
- Support of the **specific publishing activity in Braille and in audio technology** for the blind;
- Establishment of the **National Library of the Blind**;

⁴⁷ It must also be noted here that the proposed measures are good, but I think that some of them have not been sufficiently implemented.

- To systematically **monitor the work and achievements of people with disabilities** in culture through the media;
- To enable the **access of persons with disabilities to cultural institutions, museums, galleries, theaters, cinemas, concert halls, etc.**, and follow their programs using modern technical achievements;
- To enable persons with disabilities to **access and professional information**, that is, to experience the **cultural wealth**.

Recreation and sports

Games, recreation and sports for children and youth with developmental problems and special educational needs, as well as for persons with disabilities, contribute to the improvement of their general state of the body, self-affirmation, socialization and active involvement in social and economic life. Of particular importance for the implementation of recreational and sports activities for children, youth, students and other persons with disabilities, is the action of the national disabled sports federations as sports associations.

In the Republic of North Macedonia, it is obvious that there is **a lack of sports and recreational facilities fully adapted to the access** and implementation of sports and recreational activities for children, young people and adults with disabilities, in terms of **external and internal spatial arrangement**, as well as the equipment with specific sports requisites. There is a lack of **special curricula for physical exercise for children**, students and students with disabilities in the education process, as well as in extracurricular activities.

A special goal was the achievement of **full participation in games and sports-recreational activities** of children, students, students with disabilities, as well as providing equal conditions for playing sports for top athletes with disabilities in domestic and international competitions.

4.3. Concluding Observations of the Initial Report of the Republic of North Macedonia, UN Committee on the Rights of Persons with Disabilities, 2018

The Committee on the Rights of Persons with Disabilities of the UN, as the competent body for control and monitoring of the implementation of the Convention on the Rights of Persons with Disabilities of the UN, among other responsibilities, has the authority to exercise control over the measures taken, based on the Initial Reports⁴⁸ from the states- signatories to the Convention, and to give their recommendations in this regard. The UN Committee gave the final observations of the initial report of the Republic of North Macedonia on 29.10.2018. In that document, on the one hand, the positive aspects that the state has made are given, but in the second part, the corresponding remarks and recommendations to the state are given, with the aim of better implementation of the UN Convention.

Positive aspects

The committee praises the Republic of North Macedonia and gives the following positive aspects in this document:

- **The harmonization of national mechanisms** with art. 33 of the Convention, which is National Implementation and Monitoring;

⁴⁸ The initial reports are given by the signatory states to the Convention, in the form of answered questions given by the Committee to the state, in an appropriate written form.

- Renewed **ban on the institutionalization of children** and the commitment to put an end to the placement of children under the age of 3 in institutions;
- The adoption of **urgent measures to improve the situation** in the Special Institution in Demir Kapija and the process of developing a new strategy for deinstitutionalization, as a first step Harmonization of anti-discriminatory policies;
- **The establishment of a National Coordinating Body for the implementation of the UN Convention** on the Rights of Persons with Disabilities;
- The expressed **opposition** to the draft Additional Protocol to the Convention of the Council of Europe for the Protection of Human Rights and the Dignity of the Human Being, in relation to the **application of biology and medicine**: Convention on Human Rights and Biomedicine, and for reaffirming the principles and rights of persons with disabilities at international and regional levels, as outlined in the UN Convention.

Major areas of concern and recommendations from the UN Committee

Regarding the **General Principles and Obligations**, Art. 1-4 of the UN Convention, the Committee is concerned about:

- **The lack of harmonization of national legislation**, policy and programs with the Convention, and the existence of a medical model of disability;
- **The use of different disability assessments and definitions** in the Republic of North Macedonia's legal framework, which are not in line with the human rights-based approach to disability;
- **The lack of clear plans, timeframes or means** to ensure the implementation of the rights of persons with disabilities in consultation with organizations of persons with disabilities.

In this context, the Committee recommends:

- **Revision and ensuring compliance and alignment of national legislation and policies** with the UN Convention;
- **Removing offensive terms** related to disability and ensuring respect for the dignity of all persons with disabilities;
- Providing a **disability assessment method that fully incorporates the human rights-based approach** and uses the human rights approach to: Include organizations of persons with disabilities in the creation of the disability assessment; engaging persons with disabilities in generating the information on the basis of which the assessments were made; is eliminating numerous assessments, in order to reduce the burden on the candidates; to make the information about the conditions, assessment requirements available and easy to use for the user; frequent revision of assessment methods.
- **Organizations of persons with disabilities should be significantly involved in the creation, evaluation of laws, policies**, action plans, timelines and budgets and that their opinions will be taken into account before the adoption of decisions that concern them.

Regarding special rights, Art. 5-30 of the UN Convention, the Committee regarding Art. 5, **Equality and non-discrimination** is concerned about:

- Art. 9 of the Constitution of the Republic of North Macedonia, since **disability is not specifically mentioned** as a basis for discrimination;
- **There are no penalties in national regulations, for both public and private**

institutions or individuals that discriminate against persons because of their disability and lack of effective legal means against discrimination;

- **Trainings on non-discrimination** and reasonable adjustment are not regularly provided for public and private actors;
- The Committee is concerned that the **National Strategy for Equal Rights of Persons with Disabilities 2010-2018 has not been fully implemented**, especially in the area of support services that are necessary in ensuring independent living of persons with disabilities;

In that context, the committee makes **recommendations**, namely:

- **Revising the entire legislation** in order to include all forms of discrimination due to disability, including discrimination on multiple grounds;
- Introducing **measures to ensure compensation, including compensation**, for persons who have faced discrimination due to disability, and sanctioning perpetrators;
- **Regular training of public and private stakeholders** on non-discrimination and reasonable accommodation for persons with disabilities, which will focus on a human rights-based approach to disability, rather than through the traditional medical and charity approach;
- **In the new National Strategy for equal rights for persons with disabilities, sufficient resources should be provided** for its implementation, especially for the support services that are necessary in ensuring independent living of persons with disabilities.

In relation to Article 6, i.e. the **provisions for Women with Disabilities**, the Committee is concerned that:

- Existing legislation **does not contain specific measures** for women and girls with disabilities, and as a result women and girls with disabilities face discrimination on multiple grounds and exclusion from all areas of life;
- **National gender policies and programs do not include** the issue of disability;
- **There is a lack of special measures to protect** women and girls with disabilities from gender-based violence, especially those with psychological disabilities and/or intellectual disabilities;
- There is **poor access to regular services and reasonable accommodation** for women and girls with disabilities, especially those with psychosocial disabilities and/or intellectual disabilities;

In accordance with the goals for sustainable development Agenda 2030 of the UN, the Committee recommends that the Republic of North Macedonia strengthen measures to deal with discrimination on multiple grounds against women and girls with disabilities and in particular:

- **To introduce special measures for women and girls with disabilities in the existing legislation**, to include their rights in gender policies and programs and to promote affirmative actions, in order to advance the rights of women and girls with disabilities;
- **To implement effective legal, political and practical measures in order to deal with gender-based violence** against women and girls with disabilities; preventing and investigating the violation of their human rights and prosecuting and punishing those responsible;
- **To take all necessary measures to increase access to regular services** and reasonable adaptation for all women and girls with disabilities, to ensure the involvement of organizations of women and girls with disabilities in the development,

implementation and monitoring of such services.

Regarding Accessibility, Article 9 of the UN Convention, and what is of particular interest for this Study, is that the Committee notes that the legislation of the Republic of North Macedonia provides a systematized and comprehensive approach to the right of physical access. However, **concerns** are expressed about:

- **Lack of specific and effective measures and sanctions for the implementation of the legislation**, which provides access to the spatial environment and information, communication and technological systems;
- **Access of facilities, transport services and public institutions and other services outside Skopje is insufficient, there is also a lack of application of all international standards for accessibility** at the airports in Skopje and Ohrid;
- **The level of cooperation** between the government institutions and agencies with organizations of persons with disabilities regarding the implementation and evaluation of accessibility standards is **minimal**;
- **Legislation does not provide a systematic or complete approach to accessibility to information and communication**, including information and communication technologies and systems.

In view of the realization of the Sustainable Development Goals of the UN, from Agenda 2030, the Committee recommends to the Republic of North Macedonia:

- **To review its legislation in order to ensure the mandatory application of accessibility standards in all areas, especially for facilities, transport services, other premises and services open to the public, and information and communication technologies and systems**, and to impose strict sanctions on those who fail to apply them;
- **Apply accessibility standards as a condition in all public procurement of services and buildings and monitor implementation**;
- To ensure that **access to buildings, transportation, information and communication technologies and systems and other facilities and services open to the public and public institutions and services is available** throughout the territory of the Republic of North Macedonia;
- To **accelerate the adoption of a comprehensive national action plan for the implementation of accessibility standards** in close consultation with organizations of persons with disabilities, with clearly defined time frames, benchmarks for monitoring and evaluation.

The Committee on Art. 19, i.e. **Independent living and involvement in the community**, expresses concern about:

- **The weakness of the deinstitutionalization process** and the emphasis placed on the re-accommodation of persons with disabilities in small group homes instead of independent living conditions;
- **Lack of services and provision of personal assistance** to promote independent living of persons with disabilities;
- **More funds are still spent on institutions than on community services**;
- **Discrimination** based on age in the pilot program for personal assistance.

In that direction, the Committee makes **recommendations** for:

- **Provision of adequate human, financial and technical resources** for the full implementation of deinstitutionalization, especially for the implementation of the

transition to independent living conditions;

- Allocation of **sufficient resources to provide personal assistance** and to ensure that services in the community are available, accessible, reasonably priced, accompanied and of quality, in order to enable persons with disabilities to exercise their right to live independently and be involved in the community;
- Adoption of the measures necessary to ensure that **persons with disabilities have the legal right to a sufficient personal budget for independent living**, which takes into account the additional costs related to disability and, to redirect resources from institutionalization to community services;
- Adoption of **measures to provide personal assistance** to persons with disabilities regardless of age.

Regarding Art. 20, i.e. **Personal Mobility**, the Committee notes the efforts to promote **access to aids for persons with disabilities**, however, it is concerned about the cost of participation for orthopedic and other mobility aids that make them inaccessible to people with disabilities. The Committee recommends that the Republic of North Macedonia adopt measures to provide mobility aids and assistive devices, including assistive technologies, at affordable prices.

Regarding **Freedom of expression and opinion**, and access to information, from Art. 21, the Committee is concerned about:

- **Limited public information accessible to persons with disabilities**, including sign language translation, tactile recognition, Braille and in easy-to-read format, and other alternative forms of communication, both in public and private media;
- **The lack of standardization**, recognition and implementation of sign language as an official language.

The Committee **recommends**:

- To **consider the adoption of a law on the right of access to information** and to remove any restriction that prevents persons with disabilities from freely seeking, receiving and transmitting information and ideas on an equal basis with others, and to ensure that the owners and website designers will make them accessible to people with disabilities, especially blind and partially sighted people;
- To **adopt specific legal measures for implementation, to standardize, recognize and use sign language as an official language** and teach it in schools; to develop a pool of qualified sign language interpreters, teachers with **tactile recognition skills, Braille and skills to adapt texts into an easy-to-read format**, and to ensure that television stations provide news and programs in accessible formats, especially for the deaf persons, deaf-blind persons and hard of hearing persons.

Art. 23 refers to **Respect for the home and the family**, and in this connection the Committee is concerned about:

- **The legal provisions in the Family Law that discriminate against persons with psychosocial disabilities** and, or persons with intellectual disabilities to marry and form a family.
- Provisions in that law that require a person with an intellectual disability and, or a person with a psychosocial disability to be certified as a "person possessing knowledge and understanding".

The Committee **recommends**:

- **Amending the Family Law** in order to enable persons with disabilities to exercise their rights related to marriage, family and relationships on an equal basis with others and on the basis of their free and informed consent;
- **Adoption of measures to promote adequate legal protection and training of judicial and social workers** to ensure that persons with disabilities are not discriminated against during legal and administrative processes regarding their sexual and reproductive rights, right to family formation and guardianship over their children.

About the regulation of **Education** in art. 24 of the UN Convention, and the implementation of those requirements in the Republic of North Macedonia, the Committee is concerned that:

- **The Child Protection Law and the Basic Education Law⁴⁹ still allow the segregation of students with disabilities** and that there are segregated educational environments, especially for students with intellectual disabilities;
- **There is no comprehensive strategy** aimed at an inclusive education system with fixed deadlines and results and allocation of appropriate financial, human and technical resources, especially for students with intellectual disabilities.

In accordance with the goals for sustainable development from the 2030 Agenda of the UN, the committee for inclusive education **recommends**:

- **To revise the Law on Protection of Children and the Law on Basic Education**, in the direction of clearly promoting inclusive education and including disability as a basis for discrimination, to prohibit refusal of reasonable adjustment as a form of discrimination on the basis of disability;
- **Adopt a transition plan** to ensure inclusive education at all levels, including in higher education institutions for persons with disabilities;
- **Provide adequate support, resources and qualified training for teachers and support staff** to encourage inclusion, especially of students with intellectual disabilities, or with psychosocial disabilities and girls with disabilities;
- To ensure **universal accessibility to educational facilities**, including universities;
- Explicitly and immediately implement the **ban on excluding students with disabilities from regular schools** based on their impairments.

Regarding **Adequate Living Standards and Social Protection**, from Article 28 of the Convention, the Committee is concerned that:

- **The Law on Social Protection does not consider disability** as a basis for discrimination;
- **Disability benefits are limited by age**, e.g. persons with **disabilities aged 18-26 are not given allowances**;
- **Administrative and bureaucratic conditions regarding documentation** for commission assessments, in order for persons with disabilities to have access to social benefits;
- People with disabilities face **challenges in meeting the additional costs** of disability.

Therefore the Committee **recommends**:

- **Amending the Law on Social Protection by introducing disability into the anti-discrimination clause** and the relevant by-laws and benefit schemes, with the aim of guaranteeing an adequate standard of living for persons with disabilities, through

⁴⁹ Meanwhile in 2019 a new Law on Basic Education was adopted, which contains the concept of "inclusive education" with all the accompanying mechanisms around it, which is very good!

compensations in the form of cash allowances that would enable persons with disability to cover costs related to the disability;

- **Abolition of the provisions for persons with disabilities that qualify them according to their age** to access **social benefits**, to allocate certain monetary allowances and allowances for children with disabilities; to provide equal material assistance to biological and foster families;
- Paying attention to the connection between Art. 28 of the UN Convention, the Sustainable Development Goals of the UN, to promote the **economic inclusion of all persons, regardless of disability**.

Regarding **Participation in cultural life, recreation, free activities and sports**, regulated by Article 30 of the UN Convention, the Committee is concerned about:

- **Insufficient efforts of the state to support access and participation of persons with disabilities in cultural, recreational, free and sports activities;**
- **The fact that the country has not yet ratified the Marrakesh Agreement on Facilitating Access to Published Works for the Blind, Visually Impaired and Persons with Other Disabilities to Use Printed Materials.**

Therefore the Committee **recommends**:

- **Taking steps to support the participation of persons with disabilities**, including children, in cultural, recreational, leisure and sports activities;
- **Speedy ratification of the Marrakesh Treaty** to facilitate access to published works for persons who are blind, visually impaired, and persons otherwise disabled to use printed materials.

Finally, as general requirements for the entire process, the Committee recommends to the Republic of North Macedonia:

- To communicate these concluding observations for **consideration and action to members of Government and Parliament, officials in relevant ministries, the judiciary and members of professional groups** such as education, health and legal professionals, as well as local authorities, the private sector and the media, using modern social communication strategies;
- **To include civil society organizations, especially organizations of persons with disabilities**, in the preparation of the periodic report;
- To share these conclusions, including non-governmental organizations and **organizations of persons with disabilities, persons with disabilities themselves and members of their families**, in the national and minority languages, as well as sign language, in accessible formats, and be available on the government's human rights website.

4.4. Annual Report on the Work of the National Coordinating Body for the Implementation of the United Nations Convention on the Rights of Persons with Disabilities for 2019

In relation to the previous document, which was analyzed above, i.e. the concluding observations of the UN Committee for the Republic of North Macedonia, the Annual Report on the work of the National Coordinating Body for the Implementation of the United Nations

Convention on the Rights of Persons with Disabilities for 2019 is a kind of response to the requests and recommendations of the UN Committee by the Republic of North Macedonia. This Report was prepared in February 2020.

In April 2018, the Government of the Republic of North Macedonia adopted a Decision⁵⁰ to establish a **National Coordinating Body for the Implementation of the UN Convention on the Rights of Persons with Disabilities**, as a collective body, composed of a total of **15 members**:

- 2 representatives from the Office of the President of the Government,
- Representatives from 11 competent ministries for: education and science, labor and social policy, health, finance, transport and communications, justice, culture, information society and administration, local self-government, agriculture, forestry and water management, environment and spatial planning, as well as
- 2 representatives from civil organizations of persons with disabilities, namely a representative from the National Council of Disability Organizations of North Macedonia and a representative from parent organizations.

The National Coordinating Body for the Implementation of the UN Convention on the Rights of Persons with Disabilities is a **national mechanism for coordinating the measures and activities determined by the UN Convention**. It has a role for the **coordination of the institutions in the process of implementing the measures of the UN Convention, proposes and submits opinions on legal and by-laws**. With its scope of action, the body directly contributes to the promotion of human rights and basic freedoms of persons with disabilities.

Regarding the Realized Activities of the National Coordinating Body for the Implementation of the UN Convention on the Rights of Persons with Disabilities in 2019, the main focus is on the implementation of the activities foreseen in the Action Plans in relation to the recommendations of the UN Committee on the Rights of Persons with a disability. In that process, there was active cooperation with all interested parties: government institutions, organizations of persons with disabilities, international organizations in the Republic of North Macedonia, with the aim of successful implementation of the measures from the UN Convention.

New Law on Social Protection. In May 2019 a new Law on Social Protection was adopted, which advances the rights of persons with disabilities. It envisages an **increase in the volume of services in the local community**, which enable an independent and better quality of life for persons with disabilities and their greater social inclusion, in accordance with the measures of the UN Convention. With the new Law, as part of the social reform, 2 completely new services are introduced, namely:

- **Personal Assistance and**
- **Home Care.**

The right to compensation is extended to people with intellectual disabilities, while the part-time salary compensation allowance for a parent caring for a disabled child is increased to 50% of the average net salary. In support of biological families who have children with disabilities, the amount of the determined amount of the right to a special allowance is

⁵⁰ Decision to establish a National Coordinating Body for the Implementation of the United Nations Convention on the Rights of Persons with Disabilities, Official Gazette No. 69/2018

increased by 15%. At the same time, the so-called **permanent compensation for a parent** who took care of a child with a disability until he was 26 years old without placing him in an institution, who is unemployed and does not use the right to a pension, after reaching 62 years for a woman, ie 64 years for a man.

New Law on Basic Education. The National Coordinating Body was actively involved in the working group in the development of a new inclusive Basic Education Law in July 2019. The new law is aligned with the principles of the UN Convention on the Rights of Persons with Disabilities, especially the **Right to Inclusive Education**.

The main innovations concern that education is organized in a way that supports the **inclusion of all children in regular schools and promotes equality and accessibility**. **Disability is cited as a basis for discrimination**, as is the denial of reasonable accommodation. It is planned to develop a Concept for Inclusive Education, which will elaborate all the practical aspects for the implementation of the legal provisions. In support of learning for students with disabilities, primary schools will provide: **educational assistant, personal assistant**, support from the Learning Support Center, **inclusive team and assistive technology**, according to the assessment and recommendations of the expert assessment bodies according to the International Classification of Functionality and in accordance with the individual educational plan.

A theatrical performance interpreted in sign language. On the initiative of the National Coordinating Body, in February 2019, a play was presented, which was interpreted with sign language by professional interpreters, which is the first time in the Republic of North Macedonia that a theater play was accessible to deaf people.

Promotion of the UN Convention on the Rights of Persons with Disabilities in Braille and in audio format for the needs of the visually impaired. In June 2019, the National Coordinating Body in cooperation with the Association of Blind People from Veles, promoted the UN Convention in Braille and in audio format for the needs of the visually impaired, which was the first time in the Republic of North Macedonia, this UN Convention to be available in Braille for the visually impaired. With this step, the right to access information in an accessible format is respected.

Accessible websites. The national coordinating body initiated a procedure for the implementation of **web accessibility standards**, *Web Content Accessibility Guidelines*, on the websites of the Government, ministries and other institutions, with a unified model for a Single Web Solution, in accordance with the UN Convention.

Greater availability of funds for financing activities of civil society organizations of persons with disabilities. The national coordinating body initiated an amendment to the Decision⁵¹ on the criteria and procedure for the allocation of funds for financing the program activities of citizens' associations and foundations from the Budget of the Republic of North Macedonia. With this change, it was possible to supplement the existing evaluation of the proposed projects with an additional 3 points in the section of quality assessment and fulfillment of the criteria if they refer to promotion of equal opportunities and inclusion of persons with

⁵¹ "Official Gazette of the Republic of Macedonia" no. 25/09

disabilities.

Initiative for the ratification of the Marrakesh Treaty. The National Coordinating Body, during the second half of 2019 started an initiative for the ratification of the Marrakesh Agreement, which aims to increase access to books, magazines and other printed materials for blind people and other people who have disabilities in using printed materials. At the core of the Treaty, it states that any country that adopts it should make limitations or exceptions to copyright law, according to which a large number of intellectual works are permitted for end-users - blind people - without infringing copyright.

The Ministry of Culture prepared the provisions for amendments and additions to the Law on copyright and related rights in order to implement the Marrakesh Agreement, and the ratification of the Marrakesh Agreement should also take place.

Procurement of speech synthesizer software with a screen reader for the visually impaired.

At the initiative of the National Coordinating Body, the Government of the Republic of North Macedonia will purchase speech synthesizer software and a screen reader in the Macedonian language, with the help of which blind people will be able to use the benefits of assistive technology in all segments of their lives. The software should actually be a tool in the hands of the blind, with the help of which they will be able to use the computer smoothly for reading, searching for information and in general for their smooth education and employment.

The most complex component of the software will be the speech synthesis system in the Macedonian language, which will be made with a special focus on the needs of its users, namely:

- Quality and intelligibility of synthesized speech, close to human;
- Speed and ergonomics of its regular daily use by blind and partially sighted people;
- Usability to automatically generate audio books.

New Draft Law on Construction. Ministry of Transport and Communications in May 2019 to all interested stakeholders, including organizations of persons with disabilities, submitted the new Draft Law⁵² on Construction. In it, the principles and basic postulates regarding increasing and improving physical accessibility of the UN Convention on the Rights of Persons with Disabilities are incorporated.

Better access to orthopedic aids and **equipment.** In the new budget for 2020 at the request of the Associations of physically disabled persons, a larger sum of funds of MKD 36,000,000, about € 585,000, was provided for the provision of orthopedic aids and equipment for persons with disabilities, which had not been provided for in the budget so far. The changes concern light and active wheelchairs, liners for upper and lower leg prostheses, hydrophilic catheter, orthopedic shoes for 6-10cm shortening and antidecubitus cushion filled with air or gel.

⁵² At the time of writing this Study, this new Draft Law has not been adopted.

4.5. Action Plan for the Implementation of Measures from the UN Convention on the Rights of Persons with Disabilities for 2021

The action plan for the implementation of measures from the UN Convention on the Rights of Persons with Disabilities for 2021 adopted by the National Coordinating Body for the Implementation of the Measures from the UN Convention on the Rights of Persons with Disabilities, this plan covers several activities of the relevant actors who are in charge of implementing the recommendations and goals of the UN Convention. Among other stakeholders, the following have the most relevant roles in terms of accessibility and taking measures:

Ministry of Labor and Social Policy

- Harmonized **domestic legislation with international standards and the Law on Prevention and Protection from Discrimination**;
- To ensure that **services in the community are accessible, affordable**, adapted and of quality, in order to enable persons with disabilities to exercise their right to live independently and be included in the community.

Ministry of Information Society and Administration

- To ensure that **access to information and communication technologies and systems and other facilities and services are open** to the public and public institutions and services is available throughout the territory of the Republic of North Macedonia. It includes the creation of a national action plan for the adaptation of websites by applying accessibility standards for all government institutions and agencies;
- **To continue activities to raise awareness of the rights of persons with disabilities by increasing the amount of available content and services in the media.** In that context is the hiring of sign interpreters and the use of other tools to ensure accessibility, e.g. closed text explanations, open text explanations, subtitles, tonal descriptions, etc.
- Continuation of the **campaign to raise public awareness of the rights** of persons with disabilities.

Ministry of Culture

- **To ratify the Marrakesh Agreement** on Facilitating Access to Published Works for Persons Who Are Blind, Persons with Visual Impairment and Persons with Other Disabilities to Use Printed Materials;
- To take steps to support and **encourage the participation of persons with disabilities, including children, in cultural, recreational, leisure and sports activities.**

4.6. Legislation in the Republic of North Macedonia Relevant to Accessibility

This section will review some of the solutions in the relevant laws, for the accessibility section. For greater transparency, the most general overview of the provisions of the various laws, which refer to persons with disabilities, and accessibility, of course in the various areas of their regulation, will be given.

1. **The Law on Construction**⁵³ regulates the construction, the basic requirements of the construction, the necessary project documentation for obtaining a building permit, the rights and obligations of the participants in the construction, the method of use and maintenance of the construction, as well as other issues of importance for the construction.

Each building, depending on its purpose, should meet the basic requirements for the building, which refer to mechanical resistance, stability and seismic protection, fire protection, sanitary and health protection, protection of the work and environment, noise protection, reliability in use, efficient use of energy and thermal protection, **unhindered access and movement to and in the building** and technical properties of construction products used for construction.

In the case of reconstruction or adaptation of a building registered in the national register of cultural heritage, with which persons with disabilities are provided with unhindered access, movement, residence and work, some basic requirements for the building may be waived for the purpose of enabling unhindered access, movement, residence and work.

In the **provisions for Unhindered access and movement to and in the building**, it is said that a **building for public and business purposes and buildings with the purpose of housing in residential buildings, as well as buildings with a residential-business purpose, must be designed and built so that the persons with disabilities will be provided with unhindered access, movement, stay and work to and in the building.**

A building with the purpose of housing in residential buildings as well as a building with a residential-business purpose, with ≥ 10 apartments (10 and more), should be designed and built so that it is adapted for access, movement, residence and work of persons with disabilities, in at least 1 apartment for every 10 apartments, but not in more than 4 apartments, and at least 3% of the total number of parking spaces in the parking space of these buildings should be intended for persons with disabilities and should be marked with a corresponding horizontal and vertical signage.

During the construction of new as well as during the reconstruction of existing public areas-pedestrian paths in the central city core and in parks, the public area-pedestrian path should be designed and constructed so that it also has a path for the movement of persons with physical disabilities and persons visually impaired.

The technical characteristics and dimensions of the path for the movement of persons with physical disabilities and persons with impaired vision are prescribed by the Rulebook⁵⁴, which will be analyzed below in the text.

The way of ensuring unhindered access, horizontal and vertical movement, stay and work of persons with disabilities to and in buildings are prescribed by the Rulebook⁵⁵, which will also be analyzed below in the text.

The law provides provisions on in which cases, for which buildings a building permit is not required, and among other objects in paragraphs 7, 28 and 29 it states that a **building permit is not required** in:

- **Buildings that enable and facilitate the movement of persons with disabilities to and in the building;**
- **Beaches with accompanying facilities that are built on land and water surface, within the space provided for the beach;**

⁵³ Official Gazette of the Republic of North Macedonia, бр.130/2009, 124/10, 18/11, 36/11, 54/11, 13/12, 144/12, 25/13, 79/13, 137 /13, 163/13, 27/14, 28/14, 42/14, 115/14, 149/14, 187/14, 44/15, 129/15, 217/15, 226/15, 30/16 , 31/16, 39/16, 71/16, 132/16, 35/18, 64/18 и 168/18, 244/19, 18/20, 279/20

⁵⁴ On p. 167

⁵⁵ On p. 170

- **Walking trails.**

2. **The Law on Urban Planning**⁵⁶ regulates the systemic and hierarchical organization of urban planning in the system of spatial and urban planning, the goals and principles of urban planning and the arrangement of space, the types and content of urban plans, the conditions for performing works in the field of urban planning, the procedures for creating, adopting and implementing urban plans, supervision and other things in the field of urban planning.

Regarding the **Objectives and Principles** of urban planning, it is said that it works for the achievement of the objectives, the achievement of which is the obligation of all participants in the process of creating, adopting and implementing urban plans, namely:

- Balanced spatial development;
- **Rational arrangement and use of space;**
- Creation and **improvement of conditions for humane living** and work of citizens;
- **Overcoming urban barriers for people with disabilities;**
- **Sustainable spatial development;**
- Preservation of the quality and improvement of the environment and nature;
- Coping with climate change;
- Preservation and protection of immovable cultural heritage and
- Safety from natural and technological disasters and accidents.

The goals of urban planning are achieved by applying **the Principles of urban planning and spatial arrangement** in the process of creating, adopting and implementing urban plans, namely:

- **Integral approach in planning;**
- Care and development of regional peculiarities;
- **Realization of public interest and protection of private interest;**
- **Publicity in the procedure** for making, adopting and implementing the plans;
- **Inclusivity and participation in the procedure for making, adopting and implementing the plans;**
- Horizontal and vertical alignment and coordination in planning and
- **Respect for scientifically and professionally determined facts and standards.**

3. **The Law on Social Protection**⁵⁷ governs: the system and organization of social protection, beneficiaries of social protection, rights to financial assistance and social services, procedures for exercising rights and using services, performing the activity of social protection, personnel, financing and supervision over the implementation of social protection and other issues of importance for the performance of the activity of social protection.

Social protection is an activity of public interest that is carried out through measures, activities, programs and policies for protection from social risks, prevention and overcoming of social problems that adversely affect the well-being of citizens, with the **aim** of:

- **Promoting and maintaining social security of citizens;**
- **Prevention of social exclusion;**
- **Improving the quality of life of citizens and**

⁵⁶ Official Gazette of the Republic of North Macedonia, No. 32/20

⁵⁷ Official Gazette of the Republic of North Macedonia, No. 104/19, 146/19, 275/19, 302/20, 311/20, 163/21, 294/21

- **Strengthening the capacities of citizens to lead an independent, active and productive life.**

According to the law, "Person with Disability" is a person who has long-term physical, intellectual, mental or sensory impairments which, in interaction with various obstacles, may prevent his full and effective participation in society on an equal basis with others, and "Old Person" is a person over 65 years of age.

Related to persons with disabilities and accessibility are also the **Principles of social protection**, which the law states, namely:

- Principle of **subsidiarity**;
- Principle of **equal treatment and non-discrimination**;
- Principle of **participation**;
- Principle of **individualization**;
- Principle of **user empowerment**;
- Principle of **privacy**;
- Principle of **respect for the user's integrity and rights**;
- Principle of **best interest**;
- **Principle of the least restrictive environment**;
- **Principle of confidentiality**;
- Principle of **social justice**.

The rights to financial assistance from social protection are: Guaranteed minimum assistance; **Disability allowance**; **Compensation for assistance and care from another person**; **Compensation of wages for part-time work**; Housing Allowance; **Permanent compensation** and One-time financial assistance.

Of these rights, the 4 that are marked are relevant for this Study.

Disability compensation is provided to encourage social inclusion and equal opportunities for a person who is:

- With severe or profound intellectual disability;
- With severe physical disability;
- Totally blind person and
- Totally deaf person.

Compensation due to disability can be obtained by a person who has reached the age of 26, no later than 65 years of age, and is used regardless of the user's age.

Such persons cannot exercise the right to compensation due to disability, if they use civilian or military disability.

A parent who has a child with a disability has the **right to Permanent Compensation**. The right to permanent compensation is exercised by a parent who took care of the child until he was 26 years old, without using the service of non-family social protection, who is unemployed and does not use the right to a pension, after reaching 62 years of life for a woman, that is, 64 years of life for a man. This right cannot be exercised if the parent has been deprived of parental rights over the child.

Social services provided in the Republic of North Macedonia are:

- Information and referral services;
- Professional assistance and support services;
- Consulting services;
- **Services in the home**;
- Community services and

- Non-family protection services.

Services in the home are relevant for people with disabilities, which are **services for providing help and care in the home of a person with a temporarily or permanently reduced functional capacity**, with the aim of enabling the person to continue living in their own home and preventing the need for non-family protection .

There are 2 types of services in the home, namely:

- **Assistance and care in the home**, which provides assistance in performing basic and instrumental activities of everyday life up to 80 hours per month, for persons with reduced functional capacity, who cannot take care of themselves, in order to enable the user to self-help, i.e. to regain, acquire or maintain the ability to take care of oneself, to continue living in one's own home and to lead an independent life in the community. Users of the service are: persons with the most severe disabilities, that is, combined disabilities of the highest degree, completely blind persons, elderly persons and other persons who need help and care at home.
- **Personal assistance**, as a service, includes individual help and support for people aged 18 to 65, with reduced functional capacity, in order to enable independent living, active and equal participation in the community, as well as the performance of daily activities, which a person without a disability usually performs them without support. Personal assistance includes: help and support in performing basic and instrumental activities of everyday life, help and support at the workplace, educational institutions, rehabilitation centers, help and support in the community, other activities of the person's interest, up to 80 hours per month. Users of the service are persons with severe and most severe physical disabilities and completely blind persons.
- The services of help and care in the home, and personal assistance are provided for a person who has not concluded a contract for lifetime maintenance, that is, initiated a procedure for terminating a contract for lifetime maintenance. A user of the help and care service at home, which is realized with costs reimbursed by the center for social work, cannot use the personal assistance service at the same time.

Another convenience provided by the Law on Social Protection is **Reimbursement of funds for the purchase of passenger cars**.

Namely, a person with a severe and most severe physical disability, a person with a moderate, severe and profound intellectual disability, a totally blind person with a companion and a totally deaf person can submit a request for a refund of funds paid as customs duties, value added tax and procurement excise duty of a passenger car, which will be driven by the petitioner or his spouse, parent, child or other relative who lives with the person and between them there is a duty of support, i.e. guardian, and will be used exclusively for the person's needs for transportation and lighter social integration in the community. Such a request can be submitted once in a period of 5 years. for the purchase of a passenger car with a purchase value of up to €10,000 in MKD equivalents, i.e. with a purchase value of up to €20,000 in MKD equivalents, if the vehicle is equipped with additional equipment that allows the person to drive the vehicle independently, such as automatic or semi-automatic transmission, manual controls that replace foot controls, a hydraulic wheelchair lift or an access ramp for entering the vehicle for which proof is provided from an authorized company that installed such specialized equipment.

The amount of funds that are refunded for paid customs duties, value added tax and excise tax for the purchase of a passenger car can be up to MKD 180,000.

4. *The Law on the Protection of Children*⁵⁸ regulates the system and organization for the protection of children. The protection of children is achieved by providing conditions and a level of standard of living that corresponds to the physical, mental, emotional, moral and social development of children.

In this sphere, it starts from the principles of **protecting the right to life and development of the child, protecting the best interest of the child**, ensuring a minimum standard for every child under equal conditions, **excluding any form of discrimination**, respecting the child's right to freedom and security of the person, of own opinion and **free expression**, association and education, conditions for a healthy life and realization of other social rights and freedoms of the child.

Any person up to the age of 18, as well as persons with disabilities in physical and mental development up to the age of 26, is considered a child.

Any discrimination based on race, color, origin, national or ethnic origin, sex, gender, sexual orientation, gender identity, membership of a marginalized group, language, nationality, social origin, education, religion or belief, political assurance, religion or belief, disability, age, marital or marital status, property status, health status, personal characteristic and social status or any other basis is prohibited.

All forms of **sexual exploitation and sexual abuse** of children, harassment, child pornography, child prostitution, forced pimping, sale or trade of children, **mental or physical violence and harassment, punishment** or other inhuman treatment, all types of exploitation, commercial exploitation and abuse of children that violate basic human freedoms and rights and the rights of the child are prohibited.

Any type of direct or indirect discrimination and harassment in exercising the rights and forms of protection of children is prohibited, and this applies to all institutions for social protection and social security that decide on rights.

5. *The Law on Prevention and Protection from Discrimination*⁵⁹ is a really very important and systemic law, especially for this sphere which is the subject of interest of the Study, and therefore it will be given more space. The adoption of this law in the Republic of North Macedonia has been long overdue, and its provisions should really be used to prevent any cases of discrimination.

Discrimination is any distinction, exclusion, restriction or preference that is based on a discriminatory basis, with an act or omission, which has as its purpose or result the prevention, limitation, recognition, enjoyment or realization of the rights and freedoms of a certain person or group on an equal basis with others. This covers all forms of discrimination including **the denial of adequate accommodation and the denial of accessibility and availability of infrastructure, goods and services.**

The law regulates the **prevention and prohibition of discrimination**, the forms and **types** of discrimination, the **procedures for protection** against discrimination, as well as the composition and work of the **Commission for Prevention and Protection against Discrimination.**

The purpose of the law is to ensure the **principle of equality and prevent and protection against discrimination** in the exercise of human rights and freedoms.

⁵⁸ Official Gazette of the Republic of North Macedonia, No. 23/13, 12/14, 44/14, 144/14, 10/15, 25/15, 150/15, 192/15, 27/16, 163/17, 21/18, 198/18, 104/19, 146/19, 275/19 and 311/20, 294/21

⁵⁹ Official Gazette of the Republic of North Macedonia, No. 258/2020

This law applies to all natural and legal persons.

It is applied by all state bodies, bodies of local self-government units, legal entities with public powers and all other legal and natural persons in the field of:

- **Work** and labor relations;
- **Education, science and sports;**
- **Social security**, including the area of social protection, **pension and disability insurance, health insurance and health care;**
- **Judiciary and administration;**
- **Housing;**
- **Public information** and media;
- **Access** to goods and services;
- **Membership and action** in political parties, associations, foundations, trade unions, etc.;
- **Culture** and all other areas.

All entities from these above-mentioned areas have an obligation to take measures or actions for the promotion and advancement of equality and prevention of discrimination.

According to the terminology in the law, "**Appropriate accommodation**" is a necessary and appropriate change and adaptation required in a specific case, which does not cause a disproportionate or unnecessary burden, and with the aim of ensuring the enjoyment or realization of all human rights and freedoms of persons with disabilities, on an equal basis with others. Denial of adequate accommodation is discrimination.

"**Access to infrastructure, goods and services**" means the taking of appropriate measures ensuring that persons with disabilities have access, on an equal basis with others, to the physical environment, transport, information and communication, including information and communication technologies and systems, to other public facilities and services in urban and rural areas. **Denying accessibility and availability of infrastructure, goods and services is discrimination.**

According to the law, **the discriminatory basis** refers to the prohibition of **any discrimination based on race, color, national or ethnic origin, sex, gender, sexual orientation, gender identity, belonging to a marginalized group, language, citizenship, social origin, education, religion or religious belief, political belief, other belief, disability, age, family or marital status, property status, health status, personal characteristics and social status** or any other basis.

There are **many Forms and types** of discrimination.

- **Direct discrimination** exists when a person or a group is treated, has been treated or would be treated less favorably than other person or group in an actual or possible comparable or similar situation, on a discriminatory basis.
- **Indirect discrimination** exists when, through apparently neutral regulations, provisions, criteria, programs or practices, a person or group is placed in a less favorable position on a discriminatory basis compared to other persons or a group of persons, except when it results from a legitimate goal, and the means to achieve that goal are proportionate, that is, they are appropriate and necessary.
- **Invoking, inciting and instructing discrimination** is any activity that directly or indirectly invites, encourages, instructs or incites to discriminate on a discriminatory basis.

- **Harassment** is unwanted treatment of a person or group of persons on discriminatory grounds that has the purpose or effect of violating dignity or creating a threatening, hostile, humiliating or intimidating environment, approach or practice.
- **Sexual harassment** is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature that has the purpose or effect of violating dignity or creating a threatening, hostile, degrading or intimidating environment, approach or practice.
- **Victimization** is the suffering of harmful consequences by a person due to taking actions for protection against discrimination, that is, reporting discrimination, starting a procedure for protection against discrimination, testifying during the procedure or other way participated in a procedure for protection against discrimination.
- **Segregation** is the physical separation of a person or a group of persons on a discriminatory basis without a legitimate or objectively justified purpose.
- **More severe forms** are: **multiple, intersectional, repeated and prolonged discrimination.**

The Commission for Prevention and Protection from Discrimination is an independent and independent body, it is composed of 7 members, who are elected and dismissed by the Parliament, with a **mandate of 5 years, with the right to one more** subsequent re-election. From among the members, the Commission elects a president with a mandate of 1 year, without the right to re-election.

The members of the Commission should reflect the composition of society as a whole and the principles of adequate representation of all social groups, the principle of adequate and fair representation of community members and gender-balanced participation are applied during the selection of the members of the Commission.

Among other **competences** which are numerous, the Commission is responsible for:

- **Undertaking activities for the promotion, protection and prevention** of equality, human rights and non-discrimination;
- Monitoring **the implementation of the law and giving opinions** and recommendations;
- **Promoting the principle of equality, the right to non-discrimination** and dealing with all forms of discrimination through increasing public awareness, information and education;
- **Giving general recommendations on certain issues** in the field of equality and non-discrimination and monitors their implementation;
- Promoting and proposing **harmonization of national legislation, regulations and practices with international and regional human rights instruments**;
- **Initiating changes to regulations** for the purpose of implementing and improving protection against discrimination;
- **Providing opinions on proposals for laws** of importance for preventing and protecting against discrimination;
- Establishing **cooperation with natural and legal persons, as well as with associations, foundations and social partners** for the realization of the principle of equality and promotion of the prevention and protection against discrimination;
- **Acting on complaints**, presenting opinions, recommendations and conclusions about specific cases of discrimination;
- **Initiating a procedure for protection** against discrimination on official duty;

- **Informing the public** about cases of discrimination;
- **Collecting and publishing statistics and other data** and establishment of databases regarding discrimination;

Regarding the **Procedure for prevention and protection against discrimination before the Commission**, persons who believe that they have suffered discrimination can submit a **complaint** to the Commission, in writing or orally on the record, without obligation to pay a fee and other compensation. **A person who believes he has been discriminated against** may be represented by an association, foundation or trade union with prior consent. Associations, foundations, unions or other organizations from civil society and institutions, which have a justified interest in protecting the interests of a specific group or within the framework of their activity deal with protection against discrimination, can submit a petition, the so-called ***actio popularis***, if they make it likely that the actions of a certain natural or legal person have discriminated against a larger number of people.

The Commission initiates a procedure ex officio if, from the circumstances and facts, as well as from the knowledge obtained after a taped vote, it reasonably follows that discrimination has been carried out in accordance with the discriminatory grounds.

The petition should contain the following elements: data on the petitioner, data on the person against whom the petition is filed, the circumstances and facts on which the petition is based, data on the legal actions previously taken by the petitioner, if any, and the signature of the petitioner.

If the petition does not contain the necessary elements or is unclear, the Commission will oblige the petitioner to edit it within 8 days from the day of receipt of the petition.

Sign language can also be used in direct communication with the Commission.

The petition can be submitted **no later** than within 6 months of learning about the act of discrimination or no later than 1 year from the day when the violation was committed. The Commission can initiate a procedure even after the expiry of the term if it deems that they are works for a case that affects a larger group of people or when the consequence lasts or is temporary public interest.

The commission submits the petition to the person against whom it was filed within 5 days from the day of receipt of the petition and it can be declared about the allegations in the petition within 15 days from the day of its receipt.

A complainant alleging discrimination is required to set forth all facts that make the allegation probable. If the Commission determines that the allegation is probable, then the burden of proof shifts to the person against whom the complaint was filed.

Decisions of the Commission. The Commission issues an **Opinion**, within 60 days from the date of submission of the petition and delivers it to the submitter and to the person against whom the petition was submitted, and recommends a way to remove the violations of the right. The person to whom the recommendation is directed is obliged to act on the recommendation and remove the violation of the right within 30 days from the day of receipt of the recommendation or in a longer period if there are particularly justified reasons, but not longer than 6 months, as well as for to notify the Commission. If the person to whom the recommendation is directed does not act on the recommendation, the Commission submits a request to initiate misdemeanor proceedings before the competent court for misdemeanors.

The Commission makes a **Conclusion** for non-action or for stopping the procedure following the petition in the event that the procedure before the court for the same matter has already

been initiated or is being initiated in the course of the procedure or has been legally concluded and informs the petitioner about it.

The commission concludes that the procedure for a complaint that it has already acted on was not initiated, and no new facts and circumstances have been presented, and it notifies the petitioner of this.

The commission makes a conclusion on not starting or stopping the procedure if the petitioner decides to withdraw the petition during the procedure.

The commission makes a conclusion on not starting or stopping the procedure if the petitioner died during the procedure, unless the heirs do not they demand continuation of the started procedure.

The commission, on its own initiative, makes a general recommendation in case of discrimination against a large number of people.

In carrying out the tasks of its competence, the **Commission can perform an immediate inspection of the documentation and the premises** and request and collect copies of documents related to a specific case from all legal entities, state authorities, authorities of local self-government units, other authorities and organizations exercising public powers and public institutions and services that have data and information on cases and general practices of discrimination, respecting the right to privacy.

All natural and legal persons, state authorities, authorities of local self-government units, other authorities and organizations exercising public powers and public institutions and services, are obliged, at the request of the Commission, to provide data on specific cases of discrimination and general practices of discrimination in a period of 8 days from the day of receipt of the request.

The Commission cooperates with the institutions that act on petitions for protection against discrimination and human rights for specific cases of discrimination.

Of course, there is the **possibility of court proceedings**, for the person who believes that he has been discriminated against and can file a lawsuit before a competent civil court.

With the **lawsuit**, it can be requested to:

- Determine that the defendant violated the right of the plaintiff, that is, the action he took or failed to take constitutes discrimination;
- Prohibit taking actions that violate or may violate the rights of the plaintiff;
- Order the defendant to take actions that eliminate the discrimination or its consequences;
- Compensate material and non-material damage caused by violation of rights and
- Publish in the media the dispositive of the judgment which established discrimination in an accessible format at the expense of the defendant.

There is also the possibility of a Lawsuit for protection against discrimination in the public interest, that is, ***actio popularis***, namely associations, foundations, unions or other organizations from civil society and informal groups that have a justified interest in protecting the interests of a specific group or are engaged in protection against discrimination within the framework of their activity, can file a lawsuit, if they make it likely that a greater number of people have been discriminated against by the actions of the defendant.

In the lawsuit, a request may be made to:

- Determine that the defendant discriminated against the group whose interests the plaintiff represents, that is, the action he took or omitted could lead to discrimination of the group;

- Prohibit actions that discriminate against the group whose interests are represented by the plaintiff;
- Order the defendant to take actions that eliminate the discrimination or its consequences;
- Publish in the media the dispositive of the judgment which established the discrimination in an accessible format at the expense of the defendant.

The plaintiff alleging discrimination is required to state the facts that make the allegation probable and then the burden of proof shifts to the defendant to prove that there was no discrimination.

6. **The law on Tourist Activity**⁶⁰ is one of the systemic laws in the field of tourism. It regulates: the conditions and the method for carrying out the tourist activity, which means **organizing and conducting tourist trips in tourist places**, family outings, other non-commercial excursions and other tourist arrangements in the country and abroad, **provision of tourist information, sale and mediation in the sale** of catering and other tourist services, mediation in renting out houses, apartments and rooms for tourists, performing services with tourist guides and other services.

Other services include: **sale of train tickets and insurance** for passengers and tourists, **tourist propaganda activities**, organization of **cultural and sports events, changing jobs, renting out vehicles and vessels, selling souvenirs, tourist literature, other goods that are sold in the tourist trade, as well as the sale of tickets for cultural, sports or other events, lotto payment, sports forecast.**

Performers of tourism activity are trading companies, sole traders and natural persons, which, depending on the type of service they provide, can be: **travel agencies and travel bureaus.**

In order to carry out tourist activities, the facilities should meet the prescribed minimum technical conditions and other conditions, for which there is a by-law, which will be analyzed below in the text⁶¹.

Considering that, **the standards for tourist information centers**⁶² **were analyzed** in the previous chapters, that matter in the legislation of the Republic of North Macedonia is regulated in this law, according to which, the Tourist Bureau carries out work on:

- Intermediation in providing services for home accommodation;
- Selling tickets for cultural, entertainment, sports, recreational and business events;
- Selling souvenirs, postcards, brochures, tourist maps, films, cameras and providing tourist information and distribution of informative and promotional materials.

The founder of the tourist office can be the mayor of the municipality, and for the city of Skopje, the mayor of the city of Skopje.

7. **The Law on Catering Activity**⁶³ is a systemic law in the field of catering and together with the Law on Tourism Activity are systemic laws that regulate the activity of tourism and

⁶⁰ Official Gazette of the Republic of North Macedonia, No. 2/2004, 89/2008, 12/2009, 17/11, 47/11, 53/11, 123/12, 164/13, 27/14, 116/15, 192/15, 53/16, 31/20

⁶¹ On p.136

⁶² In Chapter 3.1., on p. 39

⁶³ Official Gazette of the Republic of North Macedonia, 6p. 62/04, 89/08, 115/10, 53/11, 141/12, 164/13, 187/13, 166/14, 199/14, 129/15, 192/15, 39/16, 53/16, 71/16, 31/20

catering. The Law on Catering Activities regulates the conditions and manner of performing the catering activity.

Catering activity is the provision of: Catering services for accommodation, and Catering services for food.

Catering activities can be performed by caterers, that is, they are trading companies and sole traders registered in the commercial register.

Likewise, natural persons who can perform catering activities are registered in the register maintained by the mayor of the municipality or the city of Skopje.

The prescribed minimum technical conditions must be met for catering activity. In addition to the minimum technical conditions, the following conditions must also be met: **the building to be usable, sanitary and health conditions, the conditions for protection at work, the protection and improvement of the environment, fire protection and the conditions for protection against noise** prescribed by law.

The catering activity in the catering facilities night bar, cabaret, disco club and disco club in an open area can be carried out if the caterer also provides the consent of the state administration authority responsible for the affairs of the field of internal affairs that the conditions for the protection of public order and peace and traffic safety are met.

For the minimum technical conditions of the facilities for the performance of catering activities, there is a Rulebook⁶⁴, which will be analyzed below in the text.

Catering facilities can be:

- **Catering facilities for accommodation**, where there are 2 types:
 - **Basic catering facilities for accommodation**, which include hotels, hotel settlements, apartment settlements, motels, boarding houses, residences, tourist settlements, etc.
 - **Complementary accommodation facilities**, which include: hostels, inns, camps, private accommodation facilities - rooms, apartments, houses, resorts - for children, young people, workers, people with disabilities, etc., other complementary facilities, holiday homes, mountain and hunting lodges and houses, facilities for temporary accommodation, etc.
- **Food catering establishments**, which include:
 - **Restaurants**, which can be: restaurants, inns, self-service restaurants, express restaurants, kiosks, dairy restaurants, garden restaurants, summer gardens, kebab shops, bistros, pizzerias, fast food establishments, etc.;
 - **Bars**, which can be: bar, cafeteria, night bar, coffee bar, cabaret, disco club, disco club in open space, pub, etc.;
 - **National restaurant - meana**;
 - **Canteens** and
 - Other food catering establishments.

The catering facilities for accommodation, hotel, motel, boarding house, tourist apartment, mountain and hunting lodges, as well as the catering facility for food - restaurant and national restaurant - meana, before starting to perform the activity, **must be categorized** according to the conditions and standards prescribed for individual types of these facilities in terms of arrangement, equipment and quality of services with stars.

Likewise, houses, apartments and rooms for rent by natural persons and rural households must be categorized.

⁶⁴ On p. 138

There is a Rulebook⁶⁵ for the conditions for categorization for performing the catering activity, which will be analyzed below in the text.

Natural persons can provide catering services, namely:

- ready-made catering services in dedicated mobile facilities;
- catering services for accommodation and meals in houses;
- catering services in apartments and rest rooms;
- catering services in rural households and
- catering services in vessels.

Catering services to nudists can be provided in catering establishments and camps.

8. The Law on Primary Education⁶⁶ regulates the educational process that takes place in primary schools, as well as the activity of primary education as part of the unique educational system. The activity of primary education is of special public interest.

Every child has the right to free and quality primary education and education in primary school.

Basic education is developed based on the following **principles**:

- **The best interest and full development** of the student;
- **Equality, availability, accessibility and inclusiveness;**
- General education character of primary education;
- Ensuring the quality of education and international comparability of students' knowledge;
- Active participation of students in the life of the school and the community;
- Preparing the student for lifelong learning;
- Promotion of similarities and acceptance of differences, interculturalism, multiculturalism, interculturalism and multiculturalism;
- **Care for physical safety and health;**
- Autonomy, competence and responsibility and
- **Partnership between the school, parents**, that is, guardians and local self-government units.

There are **provisions on the protection against discrimination and the promotion of equality**. In basic upbringing and education, any direct or indirect discrimination, calling for and inciting discrimination and assisting in discriminatory behavior on the basis of gender, race, skin color, national or ethnic origin, **disability**, gender, sexual orientation, gender identity, citizenship, social origin, education, religion or religious belief, political belief, other types of belief, age, family or marital status, property status, health status and social status or any other basis which is provided for by law or by an international agreement ratified in accordance with the Constitution of the Republic of North Macedonia in the exercise of rights from primary education is prohibited.

Any form and type of discrimination in primary education is prohibited in:

- The educational process;
- The enrollment process in primary education;
- **Availability of services and benefits, reasonable adjustment and accessibility to and in facilities;**
- Employment, career advancement and termination of employment;

⁶⁵ On p.146

⁶⁶ Official Gazette of the Republic of North Macedonia, No. 161/19, 229/20

- Student organization;
- The content of curricula and textbooks;
- Management and participation in the bodies and bodies of schools;
- The financing of primary education and
- Any other area of primary education.

The prohibition of discrimination also applies to discrimination against the parents, that is, the student's guardians on any of these grounds.

Protection against discrimination is provided in accordance with the regulations in the area of prevention and protection against discrimination.

In primary education, affirmative measures are applied in order to overcome discrimination and exclusion of children and adults, which include: the non-application of the rezoning provision when enrolling students with disabilities, exemption from paying the costs of recognition and equivalence of certificates acquired abroad, free transportation for students with disabilities, educational mediators, monetary compensation for winning first place at a state competition, incentives for participation and monetary compensation for winning a prize, a medal at an international competition.

Primary education is institutionally, personnel- and content-organized in a way that supports the inclusion of all children in regular primary education.

Inclusive education is a process that **takes into account the different individual needs for the development** of students, giving equal opportunities for the realization of basic human rights for development and quality education. It includes **changes and adjustments to the teaching content, approach, structures and strategies, for students with disabilities**, with a common vision and conviction that the state has an obligation to provide education for all children.

The infrastructure, individualized support, curriculum and program in primary education are reasonably adapted to the individual needs of the student. That **reasonable adjustment** represents: changing and adapting the conditions for upbringing and education in a specific case, which does not cause a disproportionate or unnecessary burden on the school, and is aimed at ensuring the enjoyment or realization of all human rights and freedoms of students with disabilities on an equal basis with others.

Access to infrastructure and services means taking measures that ensure that students with disabilities have access, on an equal basis with others, to the physical environment, transportation, information and communication, including information and communication technologies and systems in the primary school.

In elementary schools, **Inclusive Teams are formed**, a team responsible for inclusive policies and practices at the school level and an inclusive team for a student who works according to an individual educational plan or a modified curriculum.

To support learning for students with disabilities, the primary school provides: an educational assistant, a personal assistant, appropriate professional support from a learning support center, an inclusive team and assistive technology on the recommendation of the expert assessment body and in accordance with the individual education plan or the modified program.

9. **The Law on Labor Relations**⁶⁷, as the *lex generalis* in this sphere, regulates the labor relations between workers and employers, which are established by concluding an

⁶⁷ Official Gazette of the Republic of North Macedonia, No. 62/2005, 106/2008, 161/2008, 114/2009, 130/2009, 50/10, 52/10, 124/10, 47/11, 11/12, 39/12, 13/13, 25/13, 170/13, 187/13, 113/14, 20/15, 33/15, 72/15, 129/15, 27/16, 120/ 18, 110/19, 267/20, 151/21, 288/21

employment contract. The employment relationship can be regulated by another law, a collective agreement and the employment contract.

The purpose of the Law on Labor Relations is the **inclusion of workers in the work process**, as well as ensuring the harmonious development of that process, while respecting the right of workers to **freedom of labor, dignity and protection of the interests of workers** in the work relationship.

And in this law there are **provisions for the prohibition of discrimination**, in the sense that the employer must not put the job seeker or the employee in an unequal position because of racial or ethnic origin, skin color, gender, age, **health condition, i.e. disability**, religious, political or other conviction, membership in trade unions, national or social origin, family status, property situation, gender orientation or for other reasons and personal circumstances.

The principle of equal treatment implies the **prohibition of direct and/or indirect discrimination**.

This law has **provisions for Part-time work of a parent of a child with developmental problems and special educational needs**, in the sense that one of the parents of such a child has the right to work 1/2 of the full-time work if both parents are in work relationship or if the parent is single, based on a finding by a competent medical committee, if the child is not placed in an institution for social and health care. Part-time work is considered full-time, and the right to compensation is paid according to social protection regulations.

The employer is obliged to provide the employee with an immediate risk of disability. suitable work and salary compensation in the amount of the difference between the salary the employee worked for before the deployment and the salary at the new job.

An employee whose work capacity has been determined to be reduced by 50%, in accordance with the regulations for pension and disability insurance, has the right to reduced working hours or to be assigned to other suitable work.

A special account is also taken of the **Special protection of older workers**, i.e. workers older than 57 years for women and 59 years for men enjoy special protection, in the sense that the employer may not assign overtime to an older worker without the employee's consent or night work.

10. **The Law on the Employment of Disabled Persons**⁶⁸ regulates the special conditions for employment and work of disabled persons: when they independently perform activities as a sole trader, with an employer or has the capacity of an employer, in the state administration, local self-government units, public enterprises, institutions, agencies and funds and other state institutions, as well as the conditions for establishment and the conveniences for the operation of the trade company for employment of disabled persons - protective company.

Measures to improve the conditions for employment and work of a disabled person are:

- **Granting of non-refundable funds for the employment of an unemployed disabled person for an indefinite period of time, adaptation of the workplace** where the disabled person will work if it is needed and procurement of equipment according to the criteria;
- **Exemption from taxes and provision of funds** for contributions and
- **Financial support** in operations.

⁶⁸ Official Gazette of the Republic of North Macedonia, No.44/2000, 16/2004, 62/2005, 113/2005, 29/2007, 88/2008, 161/2008, 99/2009 /11, 129/15, 147/15, 27/16, 99/18, 103/21

For the purpose of employment of disabled persons, **protective companies are established as trading companies**. A protection company can be founded and operate as a protection company if it employs at least 10 people for an indefinite period of which at least 40% are disabled people from the total number of employees, of which at least half are people with a determined disability.

The employees of the protection company who are not disabled persons and disabled at work are exempted from paying personal income tax and they are provided with funds for contribution to pension and disability insurance from the Budget of the Republic of North Macedonia.

For the purpose of financing works to improve the employment and working conditions of disabled persons, workplace adaptation, contribution to pension and disability insurance, contribution to health insurance and contribution to employment for the employed disabled person, contribution to pension and disability insurance for all employees in the protection company and procurement of equipment, 10% of the total realized funds from the existing contribution for employment are allocated to the sub-account in the Employment Agency, as a Special Fund.

Within the available funds from the **Special Fund**, non-refundable funds are allocated for:

- **Employment of a disabled person for an indefinite period** in the amount of 20 average net wages paid in the Republic of North Macedonia, i.e. 40 average net wages paid for the previous year before employment for the employment of a blind person with visual impairment from 90 to 100% and a physically disabled person who he needs a wheelchair for movement;
- **Adaptation of a workplace** in the amount of up to MKD 100,000 and the same can be used again if this is required by changes in the technical-technological process or the type and degree of disability of the disabled person and
- **Purchase of equipment** in the amount of up to 200 average net salaries paid in the Republic of North Macedonia in the previous year, whereby the applicant should participate in the calculated value of the program with his own participation of 20% of his own funds, a bank loan or personal funds of the owner of the company, and the amount of the allocated funds can be up to the amount of property and permanent capital recorded in the applicant's books, initial investment, equipment, construction and business facilities, shops, etc. and submit a 2:1 mortgage or a bank guarantee in the amount of the approved funds.

11. **The Law on Disability Organizations**⁶⁹ is a law that regulates the status, scope of action, financing and ownership of disability organizations. A disability organization is an **association of citizens** that is formed in accordance with the Law on Associations of Citizens and Foundations.

A disability organization can join in various forms such as alliances, and other forms of association, such as an association or union of citizens' associations.

The disability organization is a voluntary and independent association of persons with disabilities for the purpose of realizing common interests and special needs, as well as their legal representatives, in order to **determine, represent and satisfy the special needs of persons with disabilities**, as well as **to represent the interests** of persons with disabilities.

⁶⁹ Official Gazette of the Republic of North Macedonia, Nos. 89/2008, 59/12, 23/13, 150/15, 27/16, 317/20

In the management bodies of the disability organization, persons with disabilities are represented by at least 70%, except in the disability organizations of persons with intellectual disabilities.

In its activities, the disability organization respects the principles of disability protection, established in the laws of Macedonia, international legal protection and international standards and conventions in the field of disability protection. The disability organization can operate at the national or local level.

Disability organizations participate in the formulation of the national policy related to disability protection and in **measures to ensure** equal opportunities and equal rights for persons with disabilities. The state authorities consult the disabled organizations for all these matters.

Members of a disability organization can be disabled persons, their legal representatives and other natural persons who help the activity of the disability organization. The activity carried out by the disabled organization is unprofitable. Regardless of the principle of non-profitability, the disabled organization can also carry out a profitable activity. The disabled organization must not perform profitable activities as its predominant activity.

Objectives of action of the disabled organization to achieve the quality of life of persons with disabilities are, in particular:

- **Respect for the human rights of persons** with disabilities;
- **Involvement in society** and participation in everyday life;
- **Non-discrimination** of persons with disabilities;
- **Encouraging people with disabilities** to rely on their own strengths and abilities;
- **Autonomy of persons** with disabilities as users of services;
- **Economic, social, health and legal protection** of persons with disabilities;
- **Social justice and social security.**

Within the scope of their activity, disability organizations perform the following tasks:

- **Determine the interests and represent the needs of persons with disabilities in each area**, which relate to the lives of persons with disabilities, contribute to creating awareness in the public and influence changes in favor of persons with disabilities;
- **They plan, organize and carry out projects** that enable certain groups of people with disabilities to participate more actively and help in the removal of disability and greater independence in life, training for active life and work, transportation, supply of technical aids, personal assistance, care, physical assistance, daycare centers, clubs, programs for children and youth with special needs, programs for the elderly, sick and infirm, interpretation and support, health care programs and other rehabilitation projects, informative, publishing, cultural, recreational, sports activity, etc.;
- **Participate in the prevention and removal of barriers** in the physical and social environment;
- **Organize and implement activities for getting to know** disabled persons in the field of health protection, medical and social rehabilitation, upbringing, education, training, employment, social protection, culture, sports and recreation;
- **Prevent and mitigate social and psychological consequences** of disability;
- **They train people with disabilities for self-help** and their relatives and other people to live and work with people with disabilities;
- **They develop the social skills of people with disabilities** and their awareness of different areas of life;

- Encourage the activities of appropriate authorities and organizations **for the most successful resolution of issues related to persons with disabilities;**
- **Participate in the drafting of state measures and propose acceptance of regulations and measures** in the area of disability protection;
- **They represent, protect and respect the rights and interests** at the state and local level;
- **Provide support and create opportunities for the development** of self-help and charity and connect with other disability organizations in the country and abroad.

12. ***The Law on The Use of Sign Language***⁷⁰ is a special and specific law, which regulates: the right to use sign language, the right of deaf people to sign language, the study of sign language, a sign language interpreter, the tasks of the National Union of the Deaf and Hard of Hearing of the Republic of North Macedonia, the financing, the realization of the rights and the criminal sanctions.

Sign language is recognized as a completely natural way of communication equal to spoken communication. It is a language with which hearing impaired people understand each other, that is, it is a natural means of communication between these persons and other natural and legal persons who need communication.

Sign language is a visual-sign language system, which implies a certain placement, position, direction and movement of hands and fingers and facial expressions. Deaf person is considered a person whose hearing loss is over 80 dB, decibels and who, even with a hearing amplifier, cannot perceive verbal speech.

A person is considered to be hard of hearing whose hearing loss in the better ear is from 25 to 80 dB, decibels, and who has fully or partially developed verbal speech.

Deaf and hard of hearing people can exercise the right to interpretation from spoken language to sign language and from sign language to spoken language.

Deaf and hard of hearing people have the right to use sign language as a party or participant in proceedings before state authorities, local self-government authorities, judicial authorities, public enterprises, institutions, agencies, funds and other institutions and organizations, through an interpreter.

State authorities, local self-government bodies, judicial authorities, public enterprises, institutions, funds and other institutions and organizations are obliged to provide a deaf and hard of hearing person with an interpreter at the request of the deaf person or ex officio immediately when such a person submits a decision from the center for social work, which recognizes the right to use an interpreter, and the interpreter's expenses are reimbursed by the authorities or institutions

The Institute for Special Education at the Faculty of Philosophy organizes the study of sign language through the introduction of a teaching subject.

The school for primary and secondary education, in which deaf and hard of hearing children and young people are educated, organizes the study of sign language through the introduction of a teaching subject.

The union organizes the study of sign language for citizens who want to study sign language. The union trains sign language interpreters through various educational forms.

An interpreter is a person who interprets from the Macedonian spoken language and the spoken language of the members of the sign language communities to the deaf and hard of

⁷⁰ Official Gazette of the Republic of North Macedonia, Nos. 105/2009, 150/15, 30/16, 103/21

hearing people, and interprets from the sign language of the Macedonian spoken language and the spoken language of the members of the communities to the hearing people. He is an adult who holds a certificate and is registered in the register of interpreters.

4.7. By-laws in the Republic of North Macedonia, Relevant to Persons with Disabilities and Their Accessibility

In this section, a special review will be given of the most significant by-laws, which extend from some of the above-mentioned laws, and through which provisions and standards are given in an operationalized manner regarding the accessibility of persons with disabilities. It can be said that **the essential parameters for accessibility are given in the by-laws.**

Related to the purpose of this Study, an overview will be given to:

- Rulebook on minimum technical conditions for carrying out tourist activity, Official Gazette of the Republic of North Macedonia no. 16/2006
- Rulebook on minimum technical conditions for catering activities, Official Gazette of Republic of North Macedonia, no. 16/2006, 44/2013
- Rulebook on conditions for categorization of facilities for performing catering activities, Official Gazette of Republic of North Macedonia, no. 16/2006, 87/12, 41/13.
- Rulebook on the technical characteristics and dimensions of the path of movement of persons with physical disabilities and visually impaired persons, Official Gazette of Republic of North Macedonia, no. 17/2015
- The rulebook on the method of ensuring unhindered access, movement (horizontal and vertical), stay and work of persons with disabilities, to and in, buildings with public and business purposes, buildings for housing in residential buildings, as well as buildings with residential and business purposes, Official Gazette of Republic of North Macedonia, No. 17/2015
- Rulebook for urban planning, Official Gazette of the Republic of North Macedonia, no. 225/2020

4.7.1. Rulebook on Minimum Technical Conditions for Carrying Out Tourist Activities

This Rulebook on minimum technical conditions for carrying out tourist activity⁷¹ derives from the Law on tourist activity, and it prescribes the **minimum technical conditions that must be met by facilities for carrying out tourist activity, that is, travel agencies.**

Tourist agencies can carry out tourism activities in appropriate business premises, business units, if they meet the minimum technical conditions. A business unit is the business premises of the travel agency in which the travel agency directly provides its services to the users. It consists of offices or other suitable premises.

The travel agency that directly sells tourist package-arrangements and other excursion programs should have a business unit with a size of **at least 14 m² and a height of 2.4 m.**

As an exception, if the business unit is located in a building that is registered as a historical-cultural object or is located in an object of special environmental value, i.e. in a protected

⁷¹ Official Gazette of Republic of Macedonia, No. 16/2006

monument or in a kiosk, the size should be **at least 7 m²**, i.e. the height should not be less than **2.2 m**.

In business premises with more than 2 points of sale, the area of 14 m² is increased by another 4 m² for each point of sale.

The business premises should be arranged and equipped in such a way as to enable direct contact with the users, as well as their smooth movement.

If more than 3 employees work at the counters in the business unit, the name of the travel agency service provided at that counter should be visibly marked on individual counters of the business unit, e.g. sale of plane tickets, sale of tourist arrangements, exchange services, etc. Then the area in front of the counter should have seating for service users unless customer seats are placed directly in front of each individual counter.

If there are more than 5 employees working at the counters in the business unit, for performing administrative and other tasks, a separate business space should be provided, separate from the space where the services of the travel agency are sold. And such provisions do not apply to travel agencies that sell travel arrangements or provide travel services through means of communication, that is, through distance without any direct contact with the users.

Travel agencies that sell travel arrangements or provide travel services via the Internet, means of communication over distance should provide users with accessible information via phone and e-mail, about reservations, cancellations and changes to trips and services.

Travel agencies operating online should provide the user with clear and accessible information about: The name, address and identification code of the travel agency.

The space of the business unit, as well as the space in which the business space of the travel agency is located, should be well lit with natural or artificial lighting and ventilated naturally or artificially throughout the entire working time.

In the winter period, these rooms should have a temperature of at least 19°C.

The travel agency should have at least 1 direct connection to the telephone network and one telefax machine, and it should also have appropriate minimal information equipment with at least one 1 computer with a printer. The business unit of the travel agency should have at least 1 direct connection to the telephone network, one telefax machine and minimal information equipment, at least 1 computer with a printer.

If there are more than 2 workplaces in the travel agency or in its business unit, then there should be telephone sets for connection and for every 2 workplaces 1 connected telephone set.

The business unit should have at least 1 toilet with running water and an anteroom where the sink is located.

The toilet and vestibule should have a floor made of material that does not let water pass through, and the walls should be covered with ceramic tiles or other suitable material up to a height of 1.6 m from the floor.

As an exception to this, if the business unit is located in a building that is registered as a historical-cultural object or as an object of special environmental value, i.e. it is located in a protected historical monument, as well as in objects intended for trade, a department store, in banks, in hotels, at a fairground, at a train station or airport terminals or at a kiosk, the business unit should not have its own toilet, but employees should be able to use a nearby toilet.

4.7.2. Rulebook on Minimum Technical Conditions for Catering Activity

The Rulebook on minimum technical conditions for performing catering activities⁷² was adopted on the basis of the Law on catering activities, and it prescribes the **minimum technical conditions that must be met by catering establishments for accommodation and catering establishments for food.**

The space in which guests are served outside the service premises, e.g. terraces, gardens, etc., as well as the space where services are occasionally provided to serve guests, e.g. on beaches, picnic areas, fairs, etc., should be arranged, enclosed and equipped with tables, chairs, sun umbrellas, etc.

The minimum technical conditions should be met in all types of catering facilities. At the main entrance to the catering facility, the type and name of the facility should be prominently displayed.

The facilities should be arranged and equipped so as to enable rational use of space, smooth movement of guests and staff, smooth transfer of material, **proper and hygienic preparation,** handling, storage, serving and delivery of food products, **protection of guests' health and the employed staff.**

Sufficient quantities of hygienically correct water and an adequate supply of drinking water should be provided at all times in catering establishments. **The supply of water and the drainage of waste liquid substances** should be solved in a hygienic way, in accordance with health regulations and regulations for the protection of the human environment. Solid waste materials should be regularly removed from catering facilities, collected in specific and arranged places, where the necessary hygienic and technical conditions are provided, and regularly referred to public landfills.

Regarding the **supply of electricity,** electricity supply should be introduced in all the premises of the catering facilities.

Catering facilities should have a connection to the public electrical network or other. an appropriate way to ensure the supply of electricity. In places where there is no public electricity network, electricity supply should be ensured in accordance with other provisions of the Rulebook and with the regulations for fire-preventive protection.

In catering establishments there should be a **connection to the public telephone network,** except in places where such possibilities do not exist, where consumers should be provided with other appropriate means of telecommunications or, if possible, specific information regarding the nearest telephone connection. If the catering facility is not connected to the public telephone network, this should be published in any brochure or information sheet of the catering facility or prior information should be given to the guests during the reservation process. At least 1 telephone set should be installed in the catering facilities available to the guests, except in the private accommodation facilities, as well as in other catering facilities, e.g. kiosks etc.

Catering facilities should operate in accordance with **fire protection regulations,** according to which there should be appliances and other fire extinguishing equipment. Employed personnel should be trained to handle the apparatus and equipment properly.

Regarding the heating, lighting and ventilation of the space, the provisions state that in all rooms in which guests stay there should be the possibility of heating those rooms so that the temperature is not lower than 19°C.

⁷² Official Gazette of Republic of Macedonia, No. 16/2006, 44/2013

Adequate natural or mechanical ventilation should be provided in the buildings, in accordance with the sanitary and health regulations and regulations for protection at work.

Rooms, rooms and spaces where guests pass and stay for a long time at night should be well lit or have an orientation light.

In catering facilities, in which main meals - lunch, dinner - are prepared and served to guests, there should be a kitchen, a serving room, a pantry and at least 1 toilet for men and women.

According to the parameters for the **internal height** of the space and the **available space for guests**, the height from the floor to the ceiling should be at least:

- **2.4 m in the rooms;**
- **2.6 m in common rooms** for living, serving and kitchens.

In restaurants and other catering facilities in which the rooms for serving guests have a gallery, i.e. a room on 2 levels, the height of the rooms for serving guests should be at least 4.8 m from floor to ceiling, and the height of the gallery from floor to ceiling should be at least 2.2 m.

For restaurants and other catering establishments for food, which are found in protected buildings and old parts of the city that are monuments of culture, the height from floor to ceiling should be at least 2.5 m.

In the room for serving guests, regardless of the name of the catering facility, where there are tables, a space of at least 4,8 m² should be provided for 1 table with 4 chairs.

In catering establishments, regardless of the name, **in which guests are served food and drinks at the counter or bar**, as well as those catering establishments that also provide entertainment services, such as dance, music and cabaret programs, night bar, dancing bar, cabaret, disco club, etc., a space of at least 0,8 m² per 1 guest should be provided, not counting the space occupied by the equipment - counter, bar, etc.

There are also provisions for **Dust Protection**. Porcelain, glass, tablecloths and cutlery, when not in use, should be placed in closed cupboards, drawers and protected from dust.

Catering establishments should have adequate **rooms for the personal hygiene of guests**. So, there should be adequate sanitary facilities, namely: **toilets, bathrooms and similar devices**.

Those rooms should be constantly cleaned, have ventilation and should be disinfected. Sanitary rooms must not lead directly to rooms where food is stored or prepared.

In catering establishments for accommodation, there should be separate sanitary rooms for the common use of guests, e.g. for guests in the restaurant, breakfast room, bar, lounge, etc., from the sanitary facilities to the rooms on the upper floors.

The number of **toilets and urinals** should be proportional to the size and capacity of the building, expressed by the number of places for consumption, namely:

- Up to 30 consumer places, 1 common toilet for men and women with anteroom;
- Up to 80 consumer places, 1 female and 1 male toilet and 1 urinal;
- Up to 170 consumer places, 2 female, 1 male toilet, and 2 urinals;
- Up to 350 consumer places, 3 women's, 2 men's toilets, and 3 urinals;
- Over 350 consumer places, 4 women's, 3 men's toilets, and 4 urinals.

If several types of catering facilities for food and drinks are found in one construction unit, sanitary facilities for guests can be used jointly, as their number should correspond to the total number of consumption places in those facilities, i.e. in their service rooms.

All toilets should be flushable with running water and connected to an effective drainage system.

Toilet floors must not be slippery, they must be made of material that does not leak water and is easy to wash.

The walls in the toilets should be up to a height of 1.6 m from the floor, lined with a material that does not let water pass and that can be easily washed and disinfected.

The windows of the toilets should be made of opaque glass or with the possibility of protection from views from the outside, and the door must not be glazed.

Urinals should be placed or fenced so that they cannot be seen from the outside of the premises in which they are located. They should be equipped with water for flushing, and if no shells are installed, they should have an efficient drain.

Restrooms should be located in close proximity to the area for serving and holding guests. In the event that the toilet is located outside the building of the catering facility, the approach should be concreted or paved and lit at night, and the passage protected from weather influences, e.g. rain or snow. Toilets for employees should be located so that the staff can access them without passing through the rooms and passages intended for guests.

On the inside, the toilet should have at least 1 hook for hanging clothes, a locking mechanism for the door, and in the women's toilet, a shelf for leaving bags. There should always be toilet paper in them.

In the anterooms of the toilets there should be a sink with running water, a mirror, hard or liquid soap, paper for wiping, i.e. a hand dryer and a waste container.

The number of **sinks** should be proportional to the number of consumer places, namely:

- Up to 80 consumption places 1 sink;
- Up to 170 seats, 2 sinks;
- Up to 350 seats, 3 sinks and
- Over 350 consumption places, 4 sinks.

If the sinks for women and men are located in a separate room, then there is 1 sink for each gender at 140 consumption places, 2 sinks for each gender up to 350, and 3 sinks for each gender above 350 places.

The entrance doors to the WC should be marked with an easily recognizable sign for the purpose of those rooms for men or for women.

Accommodation facilities should have an **adequate number of complete bathrooms or shower rooms**.

In the complete bathroom there should be a toilet, a reclining or a shower-tub with a shower and a sink. The area of the complete bathroom should be at least 2.5 m^2 , the shower room should only have a shower, and the area should be at least 1.20 m^2 .

Floors in bathrooms should not be slippery and should be made of material that is easy to clean, disinfect and does not leak water.

The walls in the bathrooms, up to a height of at least 1.7 m from the floor, should be covered with a material that is easy to clean, disinfect and does not leak water.

The windows in the bathrooms should be made of opaque glass or have the possibility of preventing views from outside. The bathroom door should not be glazed.

Bathrooms should have the possibility of natural or mechanical ventilation. Bathrooms should have:

- Bathtub or shower cabin with constant running cold and hot water and drainage;
- Shower curtain or partition;
- Toilet with running water for flushing;
- Sink with running hot and cold water;
- Dressing cabinet or mirror with a shelf for toiletries;
- Electric lighting;
- Plug for electrical appliances with a voltage label;

- 1 large shower towel and 2 small towels per bed;
- Hanger for towels;
- Clothes hangers;
- 1 soap per bed;
- Toilet paper;
- Glass for water, 1 per bed;
- Trash can.

Common rooms for personal hygiene on a floor, on each floor where there are more than 10 rooms without a bathroom, there should be at least 1 sanitary node-bathroom and toilet with anteroom. Bathrooms are not mandatory if there are no more than 5 beds on the same floor in the rooms without a bathroom and if that number of beds is taken into account when installing the sanitary units on the other floors.

Regarding the provisions for **Rooms and spaces for personal hygiene of the guests in the camp**, the number of toilets should be proportional to the size, capacity of the camp expressed according to the number of guests, campers and that for capacity:

- Out of 30 guests, 1 toilet for every 10 guests;
- 30-70 guests, for the number that is over 30 guests, 1 more toilet is added for every 20 guests, so e.g. if there are 50 guests, there should be 4 toilets;
- 75-150 guests, for the number that is over 75 guests, 1 toilet is added for every 30 guests;
- 150-200 guests, for more than 150 guests, for every 40 guests, 1 more toilet;
- From 250 and more guests, 1 toilet for every 25 guests.

Toilets should be separated for men and women, with 60% of them for women and 40% for men.

The ratio of the total number of toilets and urinals should be 1:0.4, and the urinals should be located in the vestibule of the toilets or they can be in an independent building near the sinks. The ratio between the number of sinks for men and women is 1:1.6, and they should be separated, and of the total number, 35% should be with a faucet for hot and cold water.

The camp should have sinks for washing feet and washing clothes and washing food utensils. The ratio of sinks for washing feet, washing clothes and washing dishes is determined based on the capacity of the camp, that is, their number in relation to sinks is 1:1.

Foot wash basins may only have running cold water and should be located in the vestibule of the toilets or in a stand-alone facility.

Camps that provide laundry and ironing services in a separate business unit can have 50% fewer laundry sinks than the number stated above. Dishwashing sinks should have at least 35% hot and cold water faucets.

Provisions for **kitchens in catering facilities** with their capacity should correspond to the capacity of the premises, that is, the space for serving.

The kitchen should also have:

- Suitable thermal devices;
- Cooling chambers or cooling devices with separate drawers for meat and fish;
- Kitchen utensils and utensils of appropriate quality, according to the category of the object;
- Work surfaces;
- Spaces and devices for cleaning and processing food products;
- Separate spaces and appliances for washing black and white dishes;

- Flowing hot and cold water;
- Manual warehouse or space for storing food products;
- Provided exhaust of smoke, steam and odors that should be in accordance with food safety regulations.

The walls of the kitchens, as well as the rooms for preparing food and washing dishes, should be lined with a material that does not leak water and is easy to clean, and a smooth surface suitable for carrying out operations. Windows and kitchen openings should be protected from the entry of flies and other insects.

For the needs of the kitchen staff, there should be a separate sink with running hot and cold water, a brush, utensils and means for washing, disinfecting, wiping or drying hands. Food waste and other garbage should not be collected in the kitchen.

There should be **space for food preparation** in the catering establishment, which does not have a kitchen, and guests are served hot dishes. It should have a suitable thermal block, a work surface and a dishwasher with running hot water. Above the thermal block, there should be a drain for smoke and odors with sufficient ventilation capacity.

In the catering facility, **the food and beverage storage area** should be separated from the kitchen or food preparation area, be lit, protected from insects and equipped with cabinets, shelves and refrigeration devices for storing food of different origins. The handy space for storing food and drink should be located immediately next to the room for preparing food and drink or to the room for serving guests, and it can be a separate space in those rooms.

In the catering facility where drinks and beverages are served, there should be a **tap**, with an area that corresponds to the size of the facility. It can be an independent functional unit, a functional unit in a separate room, a space adjacent to the room or in the space for serving guests. The taproom should have a hot and cold water tap and drain, beverage and beverage dispensers and equipment, beverage coolers, a counter with an easy-to-clean stainless steel work surface, and a separate two-piece sink or cup washer, which can be located outside the faucet. If cold and simple hot dishes are prepared and served in the tap, it should have a thermal block, a work surface for food processing, steam, smoke and odor removal devices, lighting, a sink with hot and cold water. If guests are served directly from the bar, it should have a bar with or without high chairs.

In the premises, that is, the serving area, there should be **enough space and the required number of tables, counters, chairs and benches**. The part of the catering facility, in which food services are provided on a self-service basis, should be separated from the rest of the facility intended for guests and designed and arranged to ensure the necessary hygienic conditions.

The room, that is, the serving area, should have ventilation and lighting.

The floor in the service rooms should be kept in a neat condition and made of material that is easy to clean.

Cutlery - spoons, knives, forks - should be made of material that does not corrode.

The space for outdoor service is a part of the space on the patio, terrace, etc., in which guests are served, and in one part of that space drinks, cold and hot dishes can be prepared in front of the guests.

In catering facilities that work seasonally or occasionally, e.g. on the beach, swimming pools, events, fairs, picnic areas, etc., and do not have a service area, the covered outdoor area is also considered a service area.

In the premises and the serving area, except for the outdoor serving area, there should be a sufficient number of clothes hangers, corresponding to the number of consumption places.

Wardrobes located outside of those rooms should be kept or in them a notice should be visible to the guests that the clothes left in the same wardrobe are not kept.

In hospitality facilities, 30% of accommodation rooms should be designated for smokers.

The space for smokers should be provided with ventilation that allows air exchange of at least 20 times in one hour. In the area where smoking is prohibited, an inscription with a sign for the prohibition of smoking with dimensions of 15 x 20 cm should be displayed in a visible place.

A 10 x 10 cm non-smoking sign should be displayed on each table and on the counters facing the non-smoking area.

In catering facilities that do not meet these conditions, a 15 x 20 cm non-smoking sign should be displayed on the entrance door.

There are **special provisions for employees** in the Rulebook. The facilities should have a wardrobe for the employed staff, appropriate sanitary and other rooms.

In the wardrobe or other adequate space for each employee should have a locker with a key, and a two-part locker for the staff working on food preparation and serving.

- In facilities where 6-15 workers are employed in one shift, there should be 1 toilet and bathroom each;
- In facilities where more than 15 workers are employed in one shift, there should be at least one set of toilets with 2 bathrooms;
- In facilities, in which more than 20 workers are employed in one shift, there should be a separate room-dining room, or a separate space for serving food to the staff.
- In buildings built after 2006, there should be 1 toilet and sink for the employed staff if less than 6 workers work in one shift.

Rooms in catering facilities that are rented out to guests can be single, double or multi-bed.

The floor area in the room should be at least:

- **7 m² for one-bed and**
- **10 m² for a two-bed apartment**, not including the secondary rooms, such as the bathroom, toilet, hallway and balcony, that is, it should correspond to the area determined in the categorization for separate types of facilities.
- In single and double rooms, if the wardrobe and the luggage rack are located in a side room, the minimum area of the room can be smaller by at least 2 m². The addition of an additional child's bed up to a maximum of 140 cm in length and 70 cm in width should be within the prescribed minimum areas of the single or double room stated above.
- **For rooms with more than 2 beds**, the minimum floor area is determined by adding the area determined by the categorization to the floor area of the single-bed room, and at least 3 m² per additional bed.

The floors in the rooms should match the type and category of the facility and be easy to clean. In the premises that are rented to guests, rooms, apartments, etc., there should be protection against uncontrolled entry from the outside.

Each room that is rented out to guests should contain:

- Glazed surfaces, which can be opened - windows and doors, and amount to at least 1/2 of the floor area of the room in facilities located at an altitude of more than 400 m, 1/10 of the floor area of the room in facilities located at altitude lower than 400 m;
- Windows and glazed doors of the rooms, which should have curtains or other type of blinds for darkening and preventing views from the outside;
- Separate entrance for each room, with a lockable door;

- In buildings with more than 1 floor, all rooms should be marked with numbers, in which the first digit indicates the floor, and the remaining digits the numbers of the rooms on the same floor;
- A bed with an area for one person 200 x 90 cm, and a double, French, bed with 200 x 160 cm;
- A mattress for each bed with an appropriate dimension;
- At least 2 sheets per bed, which should not contain synthetics;
- 1 pillow per bed, and an additional pillow at the request of the guest, the covers must not contain synthetics;
- At least 1 blanket per bed, and additional blankets on the guest's bed;
- Nightstand or easily accessible storage shelf for each bed;
- Mat in front of the bed, except in rooms where the floor is covered with a carpet;
- Dressing table or writing table;
- Chairs for sitting according to the number of beds in the room;
- Wardrobe, with drawers and a compartment for hanging clothes with at least 4 hangers per bed;
- Ceiling or wall lighting and 1 table lamp each, with total light intensity for normal reading and writing;
- Visibly displayed price list of the room and other services provided;
- Luggage rack;
- Mirror;
- Ashtray, except in the rooms where smoking ban is clearly marked;

The rooms for rent, which do not have their own bathroom, should have:

- Sink with flowing hot and cold water;
- Mirror with shelf for toiletries;
- Lighting above the mirror;
- Plug for electrical appliances with a mark for current strength;
- Holder for wiping towels;
- 1 towel for wiping per bed;
- 1 soap per bed;
- 1 water cup for each bed.

Rooms in houses, vacation apartments and rooms for rent to guests can be single, double or multi-bed.

The floor area should be at least:

- **6 m² for one-bed and**
- **9 m² for a double room**, not counting the secondary rooms such as bathroom, toilet, hallway and balcony.
- In multi-bed rooms, the minimum floor area is determined by adding another 3 m² per bed to the area of the double room.

The area of the bathroom with the toilet should be **at least 2.5 m²**, the hall with the sink 1 m², and the living room with the serving area and the kitchen area, if meals are organized, should be 9 m².

The internal height in rooms with a flat roof and the average height of rooms with a sloping roof from the floor to the ceiling should be at least 2.40 m.

In the houses, vacation apartments and rooms for rent, which also provide food service to the guests, there should be:

- Sink with faucet for cold and hot water and drain;
- Stove with at least 2 hotplates or other thermal device and provided energy;
- Pantry or kitchen cabinet for storing food products;
- Cupboard or drawers for dishes and cutlery;
- Meals for the preparation and consumption of food and drinks, sufficient according to the number of beds for the guests, and at least:
 - 3 plates per bed, namely dinner plate, soup plate and small plate;
 - 1 cup with a saucer for a drink per bed, e.g. white coffee, tea, cocoa, etc.;
 - 1 set of cutlery per bed, namely spoon, fork, knife, small spoon;
 - Black and white cutlery for preparing and serving dishes;
 - Utensils-knives, etc., for preparing food products;
 - Dish towels;
 - Waste container of sufficient size for one day's needs.

The cabarets, night bars and disco clubs should be located in closed spaces and they should be provided with space for playing and performing music and other programs.

The cabaret should have an area of **at least 100 m² to a maximum of 300 m²**. The equipment consists of seating sets or tables and sofas, a counter, a bar with dispensers for pouring alcoholic and non-alcoholic drinks. The cabaret can have a standing area of only 20% of the total area of the room where the cabaret is located. The cabaret should have a podium-stage where a cabaret program, comedy, stage art performance, etc. will be performed. For artistic groups, there should be separate rooms that will be designated as wardrobes for artistic groups.

Night bars should have a minimum area of **at least 50 m² to a maximum of 200 m²**. The equipment consists of a seating set or tables with chairs, a counter, a bar with dispensers for pouring alcoholic and non-alcoholic drinks. If there is a performance of dance or music programs, space should be provided for the artists and suitable rooms that will be used as wardrobes.

Night bar, cabaret and disco clubs should have at least 1 exit for a capacity of 100 guests, and for larger numbers, an appropriate number of auxiliary exits.

The disco club should have a space of **at least 300 m²**. The equipment consists of a counter, a bar with dispensers for pouring alcoholic and non-alcoholic drinks, there can be seating on the sides, and the largest part of the space is a dance floor. If they perform live music programs, or organize themed nights, it is necessary to provide wardrobes for the artistic groups.

The open-air disco club should be at an aerial distance of at least 300 m from residential buildings. After 01:00, this type of facility can use music with a maximum permitted noise level of up to 35 dB, decibels. The same equipment is required for an outdoor disco club.

Disco clubs should have additional exits provided, at least 1 for a capacity of 200 visitors. The cabarets, night bars and discotheques must have air conditioning and adequate ventilation that ensures air change 20 times in one hour. The facilities should have adequate sound insulation in accordance with the noise protection regulations.

In the **Kiosk**, in which service is performed over the counter, there should be a refrigerator, a closed cabinet for storing food products and work utensils, a work table and a sink with a water heater properly connected to the water supply and sewage network. Also, one or more of the following devices can be placed: grill or spit, toaster and suitable dishes for preparing hot dogs, french fries, etc. In the kiosk, devices for smoke extraction and devices for ventilation of the facility should be provided.

Ready-made catering services are provided in Mobile facilities, which have at least 3 m² of surface area and 1.90 m height from floor to ceiling. The facility should have a refrigerator, a closed cabinet for storing food products, utensils and a suitable place to store the utensils, a work table and a serving counter, a sink with a water heater, and the floor in the facility should be made of material that is easy to clean. The facility should have natural or artificial lighting, ventilation, and the supply of water and disposal of waste materials, that is, the supply of electricity should be the same as for all catering facilities, described above.

The room for providing food services in the vessels should meet the conditions as for other food facilities. The height of such a room should be at least 2.2 m, and the area of the room should be at least 20 m².

4.7.3. Rulebook on Conditions for the Categorization of Facilities for Performing Catering Activities

The Rulebook on conditions for categorization of facilities for performing catering activities⁷³, which was also adopted on the basis of the Law on Catering Services, prescribes the conditions for categorization of facilities for performing catering activities.

Facilities for performing the catering business are classified into categories depending on the arrangement, equipment and quality of services.

Categories are indicated by the number of stars.

The arrangement of the catering facilities into categories and the marking of categories is done in the following way:

- **Hotels - hotels, motels and boarding houses, in I, II, III, IV and V category, with the number of * stars 5, 4, 3, 2, and 1;**
- **Hotel settlements in I, II and III categories, with the number of *star 3-high comfort, 2-comfort and 1-standard;**
- **Tourist apartments in II, III and IV categories with the number of * stars 4, 3, 2 and 1. Tourist apartments of I category marked with 5 stars are called tourist residences.**
- **Camps in I, II, III and IV category with the number of * stars 4, 3, 2 and 1;**
- **Houses, apartments and rooms for rent in I and II categories with a number of * stars 2-comfort, and 1-standard.**
- **Restaurants in I, II, III, and IV category with number of * stars 4, 3, 2 and 1.**

Categorization of objects is carried out separately for each object. Blocks and whole objects have the same category. Outbuildings have the same category as the hotel they belong to. Outbuildings with 4 and 5 stars should also provide breakfast services in the facility.

During the categorization, appropriate deviations may be approved if less than 10% of the criteria required for the corresponding category are not met and if the Committee for the Categorization of Catering Facilities decides that the deviations do not affect the quality of services for the requested category by the applicant .

The category of the building with its name is written on the plate which should be displayed in a visible place at the entrance to the building, that is, the house, the vacation apartment and the rental room.

⁷³ Official Gazette of Republic of Macedonia, Nos. 16/2006, 87/12, 41/13

The performers of the catering activity, i.e. the citizens who provide accommodation and food services in houses, vacation apartments and rooms for rent, in their price lists, propaganda and other materials, should designate an appropriate number of stars for the category of the object in which they are placed.

The elements for categorization are given in the annexes that are an integral part of the Rulebook, namely:

- Annex I Categorization of hotels - hotels, boarding houses and motels;
- Annex II Categorization of tourist apartments and residences;
- Annex III Categorization of camps;
- Annex IV Categorization of houses, apartments and rooms for rent;
- Annex V Categorization of restaurants;
- Annex VI Appearance and size of the tile with the name and category of the object.

Based on the analysis of all annexes, it was concluded that only in Annex I and Annex II, there are provisions for persons with disabilities, and therefore only the relevant parts of those two annexes will be given.

The tables that follow below will show the most relevant parameters that exist in the annexes for categorizations, which refer to persons with disabilities, and the connection with what was discussed above in the Study, especially among the different standards.

Table no. 8 shows the part of Annex I Categorization of hotels - hotels, boarding houses and motels, where, among other parameters, a certain scoring is given for the existence of rooms for disabled people, in the different categories of hotels, boarding houses and motels, with a different number of stars, and for different categories of disability.


It is important that all provisions for these persons are made and adopted with the common inclusiveness of the association for disabled persons.





According to **Annex I**, a categorization of 5 different categories of disabilities has been made, namely:

- **Category A, Disabled persons who are partially dependent on a wheelchair;**
- **Category B, Persons with walking disabilities who need a wheelchair permanently;**
- **Category C, Blind or visually impaired persons;**
- **Category D, Deaf or visually impaired persons;**
- **Category E, which combines categories B, C and D.**

A, C and D Categories carry 5 points each in the total scoring for the categorization, and B Category carries 8 points.

**Table No. 8. Provisions for premises for persons with disabilities, according to Annex I
Categorization of hotels-hotels, boarding houses and motels**

Area	No.	Criterion	Points	* No. of stars *				
				★	★★★	★★★★★ ★	★★★ ★★★	★★★★★ ★★★
Rooms for disabled people	20 	No barriers A category. Disabled persons who are partially	5					

		dependent on a wheelchair						
	21 	No barriers B category. Persons with walking disabilities who need a wheelchair at all times	8					
	22 	No barriers C category. Blind or visually impaired persons	5					
	23 	No barriers D category. Deaf or visually impaired persons	5					
	24 	Completely without Barriers. E category. Unification of categories B, C and D	5					

In Table No. 9, below, the part of Annex II is given, where in the section on Arrangement and equipment, the provisions for the amenities of the entrances, as well as the number of rooms for persons with disabilities, are given.

In the section on **Entrances, amenities are provided for people with disabilities**⁷⁴, including wheelchairs, an obligation that must be fulfilled by new buildings built after 2006, with a capacity of 100 or more apartments, for blocks and units.

There should be special aids in common rooms and sanitary areas, namely:

- **Ramps;**
- **Automatic doors;**
- **Holders;**
- **Electrical switches at a lower height.**

Regarding the existence of rooms for people with disabilities, in tourist apartments and residences, Annex II states that this is an obligation only for new buildings, built after 2006, in blocks and units, that is, in:

- **Facilities with a capacity of 100 apartments, to have at least 1 apartment;**
- **For every further 100 apartments, plus at least 1 more apartment.**

⁷⁴ In the Regulations there are the expressions “the disabled”, but I think that the term persons with disabilities is more appropriate and generally accepted.

Table No. 9. Provisions for accessibility of entrances and the number of rooms for persons with disabilities, according to Annex II Categorization of tourist apartments and residences

R.No.	Name	1	2	3	4	5 Tourist Residences
I.	ARRANGEMENT AND EQUIPMENT					
1	Entrances					
1.6.	Facilities for the disabled, including a wheelchair, an obligation, which is only for new facilities with a capacity of 100 or more apartments - for blocks and units. In common rooms and sanitary areas, there should be special aids: ramps, automatic doors, handrails, electrical switches at a lower height.	x	x	x	x	x
16.	Rooms for the disabled – obligation only for new buildings in blocks and units					
16.1.	Facilities with a capacity of 100 apartments, at least 1 apartment	x	x	x	x	x
16.2.	For every further 100 apartments, at least 1 apartment	x	x	x	x	x

4.7.4. Rulebook on the Technical Characteristics and Dimensions of the Path of Movement of Persons with Physical Disabilities and Visually Impaired Persons

The regulation on the technical characteristics and dimensions of the path of movement of persons with physical disabilities and visually impaired persons⁷⁵ was adopted on the basis of the Law on Construction and it prescribes the **technical characteristics and dimensions of sidewalks and paths for the movement of persons with physical disabilities and visually impaired people.**

Before proceeding to the elaboration of the provisions of this Rulebook, it is good to give a review of the **basic dimensions of the space for unhindered movement of people who use aids**, which are given by the corresponding architectural norms and standards. As can be seen from Figure 7 below, where these basic dimensions are given graphically, it can be seen that there are different parameters for different types of disability. Namely,

- Persons who are blind or visually impaired and move with canes, should have a free space and without obstacles of 70-75 cm from the front, at a height of 70-95 cm, as well as 120 cm laterally;
- People who use crutches should have space from the front and sides up to 90 cm, and in height from 95-110 cm;

⁷⁵ Official Gazette of Republic of Macedonia, No.17/2015

- For persons who move with the help of the so-called chairs for support and movement should have a free space and without obstacles of 80 cm in front, at a height of 70-95 cm, as well as 120 cm laterally;
- Persons using a wheelchair should have free space and no obstacles in an interval of 70-85 cm, and somewhere 80 cm wide on all sides, seen in advance. In length, that space should have dimensions of 110-135 cm, depending on whether only the stroller is used, or the stroller together with the person, which can be laterally 125 cm long. The handle of the wheelchair is at a height of 90 cm, and the backrest for the person's back is at a height of 75 cm. The height of the field of vision of the eyes of a person moving with the help of a wheelchair is in the interval of 110-130 cm, considering the natural height and size of the person. The footrest is 20 cm, the seat 45 cm, the folding of the stroller up to 70 cm.

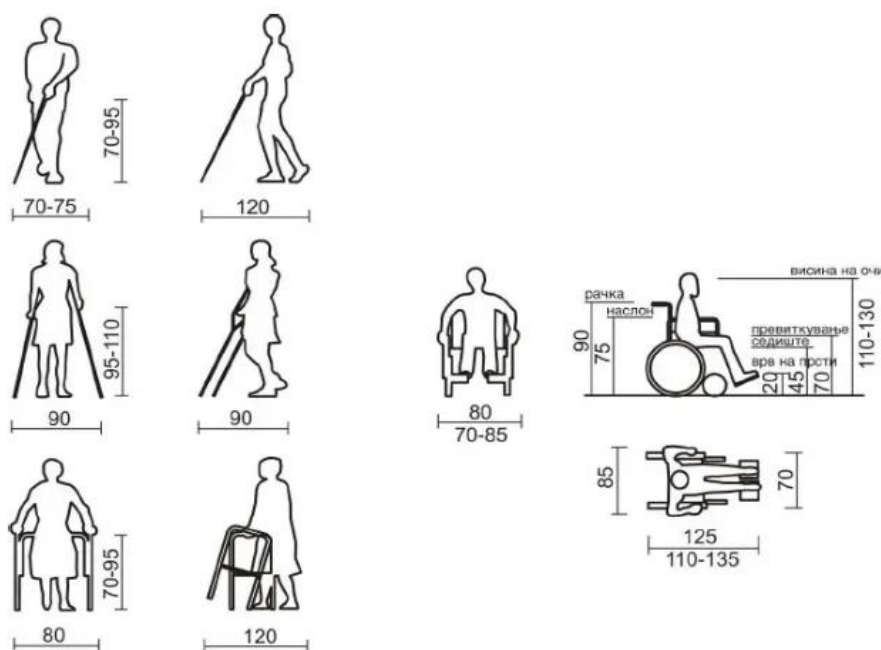


Figure 7. The basic dimensions of the space for unhindered movement of persons using aids

Sidewalks and footpaths should be accessible and interconnected in space, adjusted for orientation and with slopes that cannot be greater than 5% (1:20). The maximum slope of sidewalks and footpaths perpendicular to the direction of movement should be 2%.

Due to the unimpeded movement of persons with physical disabilities and the use of wheelchairs, the width of the sidewalks and footpaths should be 180 cm, as can be seen in Figure 8, where different situations are shown for the minimum width of paths and sidewalks, when people are moving with a wheelchair. If it is a single path, then there should be a minimum of 90 cm, if there is a path only for movement depending on the density of movement, depending on the location of the path, whether e.g. it is about more frequented places, or not, then there should be a minimum of 120-150 cm, and if there is a situation

where 2 people moving with a stroller should pass each other freely without stopping, then the minimum is 180 cm.

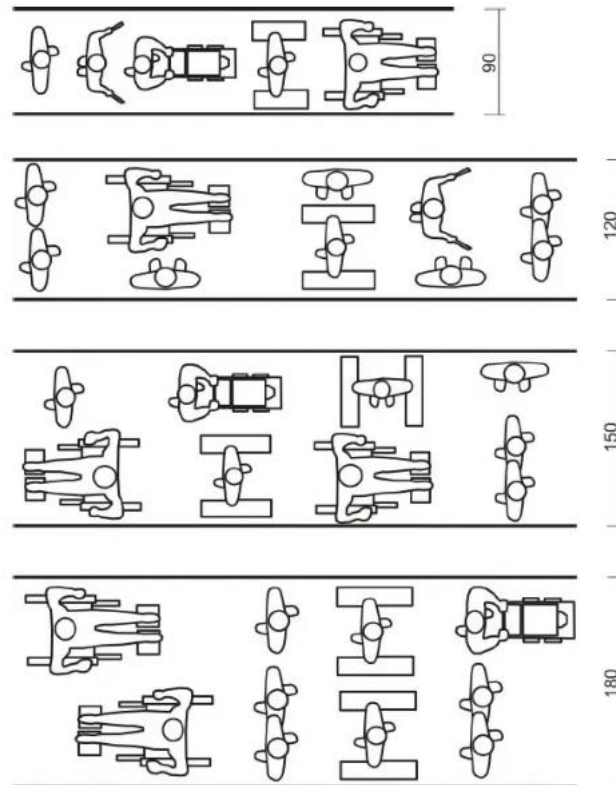


Figure 8. The minimum width of paths and sidewalks

The surface of the sidewalk and footpath should be firm, flat and slip-resistant. All grates, covers and manholes should be safe for the movement of persons with physical disabilities and persons with impaired vision and should be placed flush to the surface of the pavement and the footpath.

For the smooth movement of visually impaired people, sidewalks and footpaths should have a relief line, i.e. a relief treatment on the surface that will serve to guide blind and visually impaired people.

At the end of the sidewalk or footpath and at the points of change of the direction of movement, the direction is indicated by a transverse relief line, so that the end of the path should take the shape of the letter "T".

On the squares or on other larger pedestrian areas, with contrasting colors and materials, ensure the visibility of the main flows of movement and their changes in direction. In the corridor of basic pedestrian movements on sidewalks and footpaths, poles, advertising panels, etc., obstacles should not be placed, while existing obstacles should be visibly marked. Sidewalks and footpaths that are within public and recreational areas should be lit, marked and provided with resting places with benches along the direction of movement.

Benches should have a seat at a height of 45 cm and handrails at a height of 70 cm, measured from the surface of the sidewalk or footpath, and benches with these characteristics should be 50% of the total number of benches along the sidewalks and footpaths.

In addition to the benches, a space with an area of 110 cm x 140 cm should be provided, in order to accommodate mobility aids for people with physical disabilities.

The sidewalk, i.e. the footpath, should be:

- Raised in relation to the roadway with a flange with a height of at least 3 cm, derived from standard elements;
- When it is level with the roadway, separated by a fence whose height will be 90 cm;
- Connected to other birding areas without obstacles, and
- If there is a difference in height between the sidewalk, that is, the footpath and the rest of the pedestrian areas, they should be connected with appropriate accessibility elements to overcome the height differences.

When there is a bicycle path or a parking lot next to the sidewalk, i.e. the pedestrian path, it is necessary to create a demarcation with a deviation of at least 3 cm, with a green surface, typical elements, etc.

All communal and urban equipment - benches, tables, traffic signs, lighting candelabra, trash cans, bike racks, billboards, etc., should be placed along the edge of the sidewalk, i.e. the footpath, so that it does not become an obstacle for people with physical disabilities, blind people and visually impaired people.

All projecting utility equipment attached to the walls of buildings along the sidewalk, that is, the footpath, which is located at a height of 70 cm to 220 cm and whose projection is greater than 10 cm, should be carried out with its full length and width to the edge of the sidewalk, that is, the footpath or marked in such a way that the pedestrian area under them will increase by 3 cm in relation to the surrounding level.

4.7.5. Rulebook on the Method of Ensuring Unhindered Access, Movement (horizontal and vertical), Stay and Work of Persons with Disabilities, to and in, Buildings with Public and Business Purposes, Buildings for Housing in Residential Buildings, as Well as Buildings with Residential and Business Purposes

The Rulebook on the method of ensuring unhindered access, horizontal and vertical movement, residence and work of persons with disabilities, to and in buildings with public and business purposes, buildings for housing in residential buildings, as well as buildings with residential and business purposes⁷⁶, derives from the Law on Construction. It prescribes the method of ensuring unhindered access, horizontal and vertical movement, residence and work of persons with disabilities to and in buildings with public and business purposes, buildings intended for housing in residential buildings, as well as buildings with residential and business purposes.

The Rulebook provides a description of the most significant terms that are significant for the understanding and process of ensuring unhindered access, movement, residence, work of persons with disabilities, to and from the various buildings. According to the provisions of the Rulebook:

- **A person with a disability** is a person with an intellectual and physical disability regardless of age, i.e. a person with physical impairments who uses certain aids, a blind person and a person with reduced vision, a deaf person and a person with hearing impairment, a person with intellectual disability, a person with disabilities in

⁷⁶ Official Gazette of Republic of Macedonia, no.17/2015

voice, speech and language, autistic persons, chronically ill persons and persons with multiple types of disabilities;

- **A person with reduced mobility** is a person who has temporary or permanent problems with movement due to disability, old age, pregnancy or other reasons, e.g. a parent with a baby;
- **An obstacle** is a communication or orientation barrier, which prevents or interferes with persons with disabilities and reduced mobility in their unrestricted access, movement, stay or work;
- **Accessibility** is the result of the application of technical solutions in the design or construction of the facilities, with which persons with disabilities and reduced mobility are provided with unrestricted access, movement, stay and work in the facilities and at the same level as other persons;
- **An accessible facility**, its part or equipment, is that facility, its part or equipment that ensures the fulfillment of accessibility elements in accordance with the regulations. It includes:
 - Ramp;
 - Stairs,
 - Elevator,
 - Vertical mobile platform,
 - Elevator,
 - Entry space,
 - Communications,
 - Toilet,
 - Bathroom,
 - Shower cabin
 - Kitchen,
 - Room,
 - Classroom,
 - Workspace,
 - Apartment or suite,
 - Cafe or restaurant,
 - Changing room,
 - Entry into the water on the beach and in the pool,
 - A place in the audience,
 - Telephone, textphone, fax,
 - ATM,
 - Electrical installations,
 - Door and window handles,
 - Counter,
 - Billboard,
 - Orientation plan for movement in the facilities,
 - Stand and platform,
 - Parking place,
 - Public pedestrian area,
 - Traffic light, pedestrian crossing, pedestrian island and intersection;
- **A simply adaptable apartment** is an apartment that can be adapted to accessibility as needed, without affecting the essential requirements for the facility's usability;

- **A visual-light announcement** is a warning and notification to a deaf person or a person with hearing impairment by means of light signals;
- **An audio announcement** is a warning and notification to a blind person or a person with visual impairment by means of sound signals;
- **Sound signaling** is signaling that helps a blind person or a person with impaired vision in orienting and navigating the space;
- **An inductive node** or transmission ring is an installation that is built into buildings for the purpose of removing noise from the environment and improving sound quality;
- **A communication aid** is a device that enables people who use a hearing aid to receive sound signals without interference;
- **Relief processing** is the final relief processing of walking surfaces. The accessible relief surface, the relief guide line, the relief warning line and, or the relief warning field, shall be made with a relief treatment with a height of 5 mm, in a way that will not make movement with a wheelchair difficult, be recognizable by the touch of the foot or the white cane, that it does not retain water, snow and dirt and is easy to maintain;
- **A relief guiding line** is a relief processing on the walking surface intended for directing the movement of blind and visually impaired people, which at the end of the guidance path and at the point of change of direction is indicated by a change in the structure of the relief processing;
- **A relief line for warning** is a relief treatment on the walking surface that is placed in order to warn blind people and people with impaired vision of traffic danger;
- **A relief warning field** is a relief treatment on the walking surface that serves as a warning and notification to blind and visually impaired people about a change in the height of movement;
- **A textphone** is a telephone adapted for deaf and hearing-impaired people, as both interlocutors communicate in writing;
- **A typical element** is an object whose purpose is to demarcate the public pedestrian area from the roadway, the bicycle path and, or the parking lot, and it can be of a different shape and with other primary purpose, e.g. flower planter, wall, bench, etc.;
- **A public pedestrian area** is a footpath, a footpath in a park, in a zoo, around collective residential buildings for housing, residential-business and commercial buildings, pedestrian square, pedestrian overpass and underpass, pedestrian bridge, etc.;
- **A relief crossing plan** is a relief marking that provides blind and visually impaired persons with information about the length and type of the pedestrian crossing across the street.

Accessibility, improvement of accessibility and simple adaptation of the previously mentioned buildings, is ensured by their design and execution, in a way that contains elements of accessibility and, or meets the conditions for the use of aids used by persons with disabilities. When the accessibility elements are also part of the evacuation route in case of danger, then they should also meet the requirements of the special regulations in the field of protection and rescue and in the field of fire and explosion protection. The owner of the building should maintain the elements of accessibility without reducing the conditions for the use of the aids for persons with disabilities.

Accessibility tags are tags that indicate the applied accessibility elements. The dimensions and colors of each accessibility sign, as well as the type of material from which they are made, are determined in relation to:

- The substrate on which the marks are placed;

- The shaping of the internal and, or the external space and
- The distance from which a person with disabilities and reduced mobility can see the sign.

The pictorial representations of the accessibility marks, the conditions for the use of the aids and the mandatory elements for accessibility, are taken from the Rulebook and given in Figure 9 below.



Figure 9. Display of accessibility marks, conditions for use of aids and mandatory accessibility elements

As mentioned above, these provisions that are processed by this Rulebook refer to facilities for public and business purposes, and facilities for housing, residential and residential-business purposes.

1. The facilities for public and business purpose are:

- **Facilities for trade, hospitality and, or tourist purpose:** department stores, shopping and service centers, self-services with an area of at least 400 m², market, coffee bar, cafe and restaurant with at least 80 seats, disco club and night- club with an area of at least 400 m², tourist information center, tourist community office with an area of at least 200 m², travel agency with an area of at least 200 m², free-standing reception, facilities for nautical tourism, hotel (with room/toilet/wc) with at least 25 rooms, a hotel with at least 25 rooms with shared sanitary units, a tourist settlement with at least 25 apartments, a camp for at least 500 guests, a restaurant along a main and regional road, a hotel with a special label-motel along main and regional roads, commercial and catering contents of gas stations, etc.;
- **Facilities for postal and/or telecommunications purpose:** postal room for working with parties with at least 3 counters or desks for the same type of operation, telecommunications center for providing services to users with at least 3 counters or desks for the same type of operation, facilities in which are offered telecommunication services of phoning, faxing, etc. with at least 3 devices;
- **Facilities for providing services in exchange for money, and other financial services:** commercial banks with at least 3 counters or desks for the same type of operation, branch office of a financial agency with at least 3 counters or desks for the same type of operation, etc.;
- **Administration facilities and similar purpose:** facilities of the administration of the units of local self-government and, or state administration, facility of the Government of the Republic of North Macedonia, facility of the Assembly of the Republic of North Macedonia, facilities of the courts, administrative office of a legal entity with public powers and other legal entities, such as State Attorney's Office, Public Prosecutor's Office, Ombudsman of the Republic of North Macedonia, etc.;
- **Facilities for health-social and rehabilitation purposes:** premises of the service for social-health services, pharmacy and shop for orthopedic aids, pharmacy and shop for orthopedic aids with at least 3 counters or desks for the same type of operation, ambulance, health center, hospital, treatment center, indoor pool in a treatment center, outdoor pool in a treatment center, spa treatment centers, public bath, home for the elderly and infirm with at least 20 rooms with shared sanitary units, hotel-type home for the elderly and infirm (with room/toilet/wc) with at least 20 rooms, apartment-type nursing home with at least 20 apartments, public kitchen, etc.;
- **Facilities in which persons with disabilities often stay:** facilities in which there is a business premises of the union, company and/or associations of persons with disabilities, institutions for upbringing and education of persons with disabilities, institutions for rehabilitation, facilities for accommodation of persons with disabilities, etc.;
- **Facilities for preschool and school education:** kindergartens, primary and secondary schools, adult education facilities, colleges, student dormitories with at least 25 rooms with shared sanitary units, hotel-type student dormitories (with room/toilet /wc) with at least 25 rooms, student apartment complexes with at least 25 apartments, etc.;

- **Facilities for cultural purpose:** university library, cultural center, congress center, museum, gallery, exhibition space with an area of at least 300 m², cinema halls with at least 100 audience seats, theater with at least 100 audience seats and concert hall with at least 100 seats for the audience, etc.;
- **Facilities for traffic purpose:** airport, bus and railway station, bus and tram stop, railway platform, port building at the shipping and ferry ports, gas station, public parking lot, public garage with a capacity of at least 300 vehicles, rest area-observatory next to the highway and regional road, etc.;
- **Sports and recreational facilities:** sports field, sports hall with at least 100 seats in the auditorium, etc.;
- **Facilities with entertainment purpose:** amusement park, zoo, botanical garden, etc.;
- **Facilities for religious and sacred purposes:** church, cathedral, mosque, ritual hall, facilities housing religious leaders, mortuary, crematorium, cemeteries, etc.;
- **Facilities for serving sentences:** correctional institutions, penitentiary, remand prison, etc.;
- **Spaces and surfaces for public purpose:** pedestrian square, street, footpath in a park, in a zoo, around collective residential buildings for housing, residential-business and commercial buildings, children's playground, promenade, overpass, underpass and pedestrian bridge, pedestrian crossing etc.;
- **Facilities for other purposes:** fair and exhibition center, technology park, public toilet, facilities in which there should be at least 4 toilet units for public use, public shelter, etc.

2. Facilities with housing purpose and with residential-business purpose are:

- **Residential building with 10 or more apartments**, exclusively intended for housing, and
- **Residential-business building with mixed-residential and other purpose, which has 10 or more apartments.**

At least 3% of accessible parking spaces from the total number of parking spaces in the parking space, marked with horizontal and vertical signage, are constructed in residential and residential-business buildings with 10 or more apartments.

4.7.5.1. Elements of Accessibility

1. Accessibility elements are such design and construction elements that determine the size, properties, installations, devices and other equipment in the facilities, for the purpose of ensuring access, movement, stay and work of persons with disabilities and reduced mobility at the same level as other persons.

Elements of accessibility are applied by choosing the most favorable solution in terms of purpose and other object characteristics. There is a division of these elements into:

- A. Accessibility elements for overcoming height differences;**
- B. Elements of accessibility for independent living; and**
- C. Elements of accessibility for independent, independent movement in public traffic.**

2. The aids used by persons with disabilities are:

- **Orientation aids**, namely:
 - White cane and guide dog, and

- **Aids for movement**, namely:
 - Wheelchair, cane, crutches and walker.

Conditions for the use of aids for persons with disabilities include:

- **Space required for movement with a wheelchair;**
- **Space required for the use of a cane, crutches and walkers;**
- **Space required for the use of a white cane and a guide dog.**

If accessibility elements are not provided for a certain object, the technical solution for the object should satisfy the conditions for the use of an aid.

A. Accessibility elements for overcoming height differences. For the need to overcome height differences in the space in which people with disabilities and reduced mobility move as elements of accessibility are: **ramps, stairs, elevators, vertical lifting platform and obliquely lifting collapsible platform.**

1. The ramp is used as an accessibility element for the needs of overcoming height differences exclusively up to 120 cm, in the interior or exterior space. Regardless of whether it is inside or outside, it should be made of materials that prevent any slippage.

The ramp should have:

- Slope permitted only up to 1:20 (5%), as shown in Figure 10 below;
- Light width of at least 120 cm in the outer space, ie at least 90 cm in the inner space;
- For every 6.00 m length of the ramp, there should be a rest platform with a minimum length of 150 cm;
- Constructed fence with handrails in unprotected places;
- Handrails with a diameter of 4 cm., shaped in such a way that they can be covered by the palm, placed at two heights - of 60 cm and of 90 cm, extended in relation to the starting plate of the ramp by 30 cm, with a rounded end;
- On the fence of the ramp located in the outer space, the handrail should be made of a material that is not sensitive to thermal changes;
- A fence filled with glass should be visibly marked with accessibility signs; and

As an exception, in an outdoor space, when there are no conditions for that, for the needs of overcoming height differences greater than 120 cm, a ramp can be provided according to the same previously mentioned conditions.

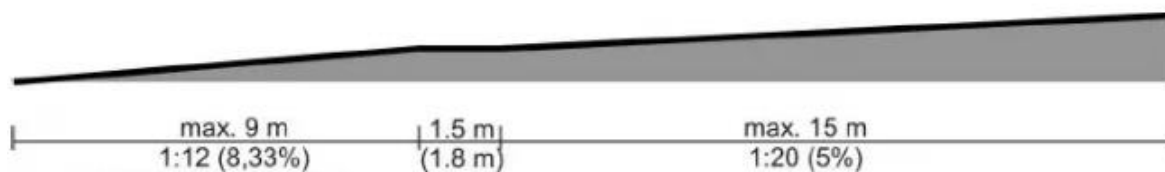


Figure 10. Longitudinal slope of ramps

2. The staircase should have:

- Step height of a maximum of 15 cm, as shown in Figure 11;
- Width of the tread of at least 33 cm;

- Clear width of a stair leg in an interior space of at least 110 cm;
- Clear width of a stair leg in an outdoor space of at least 120 cm;
- The edge of the tread, which will be treated with a material that will prevent slipping and be visually contrasting in a width of at least 2 cm;
- Handrails on the protective fence of the staircase, which will be made in continuity along the entire length, and at the beginning and at the end of the staircase, they will be extended in relation to the starting plate of the staircase by 30 cm with rounded ends;
- Handrails on the railings of the staircase, which will be made in a way that will allow it to be covered with the palm of your hand;
- Handrails on the railings of the staircase in the outdoor area, which will be made of material that is not sensitive to thermal changes;
- A stair leg with a width of 250 cm and more should be made with a central handrail;
- Space under the first stair leg enclosed by a fence at a height of 70 cm to the point where the view of the stair leg is 210 cm or the floor under the stair leg uneven by raising it by at least 30 cm to the point where the height of the view of the stair leg is 210 cm;
- Before the first and after the last step, there should be a relief warning field with a width of 40 cm over the entire width of the step, with a relief surface;
- A glass-filled fence should be visibly marked with accessibility markings.

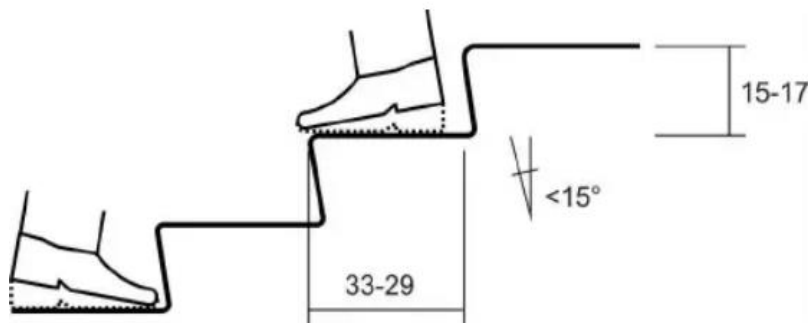


Figure 11. Outline and dimensions of the staircase

3. The elevator is used as an element of accessibility for the needs of overcoming height differences greater than 120 cm in an internal or external space.

The elevator should have:

- Internal dimensions of at least 110 x 140 cm, as seen in Figure 12;

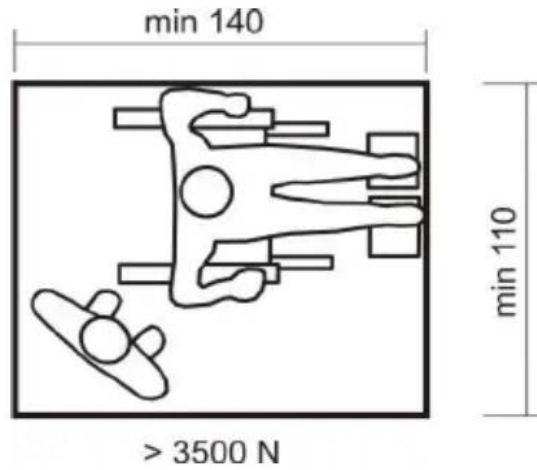


Figure 12. Minimum dimension of an elevator

- A door with a clear opening width of at least 90 cm, which should be sliding or open outwards in relation to the elevator car, as seen in Figure 13;

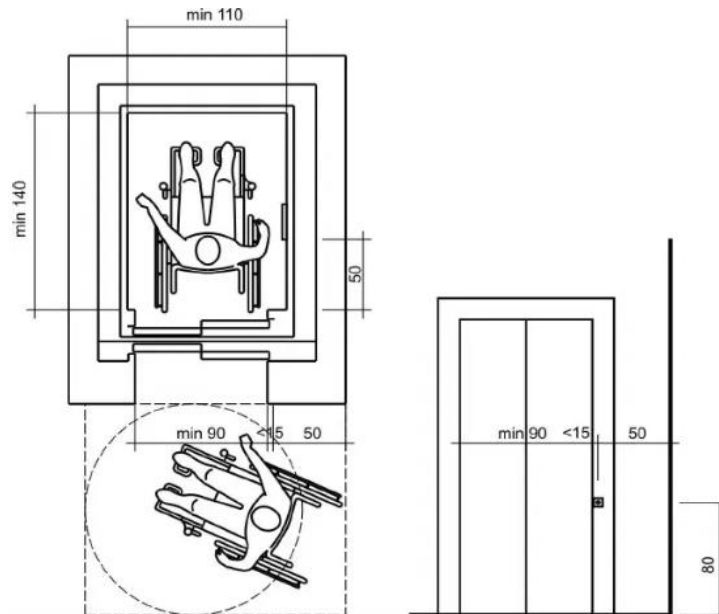


Figure 13. Minimum dimensions of an elevator door, and required space for manipulation in front of the elevator

- A call and control board is placed at a height of 90-120 cm, on which the command buttons will be contrasted, with the floor numbers recognizable in relief and with other information in Braille;
- Handrail in the elevator, which will be at a height of 90 cm;
- Announcement on the floors, which should be visual, light and sound.
- When the elevator is located in a public or business facility for health-social and rehabilitation purposes, as well as facilities where people with disabilities stay more often, then the elevator should also have a voice announcement on the floors.

From the building's entrance door to the elevator, there should be a relief line of at least 40 cm wide, with relief treatment. When overcoming height differences is solved by multiple lifts, then at least 1 elevator should have all these previously mentioned features.

4. The vertical lifting platform is used as an element of accessibility for the needs of overcoming height differences greater than 120 cm in an internal or external space, when the same cannot be solved with an elevator or other means. prescribed element of accessibility. The vertical lifting platform should have:

- Performance surface of at least 110 x 140 cm;
- Sides of the platform closed up to a height of 120 cm;
- An entrance door with a clear opening width of at least 90 cm, which should be sliding or open outwards.

5. The obliquely lifting collapsible platform is used as an element of accessibility for the needs of overcoming height differences greater than 120 cm in an internal or external space, when the same cannot be solved with an elevator or other. element of accessibility. The tilting collapsible platform is placed on the side stair walls or the stair railing, which is guided along the entire length. She should have:

- Performance surface of at least 90 x 100 cm;
- Lateral floor folding protection with a height of 20 cm and a folding protective handle.

B. Elements of accessibility for independent living

Elements of accessibility for independent-independent living are: **entrance area, communications, WC, bathroom, kitchen, room, classroom, work area, apartment, bar and restaurant, changing cabin, shower cabin, entrance to the water at the beach and pool , seat in the auditorium, telephone, textphone, fax machine, ATM, electrical installations-intercom, light and bell switch, kitchen plugs, other plugs, main electrical installation panel, door and window handles, counter, desk, inductive node or transmission ring, bulletin board, orientation plan** for movement in the facilities, etc.

1. The entrance space in the buildings is an entrance that can be reached directly from the public pedestrian area or with the help of accessibility elements to overcome height differences.

The entrance area should have:

- A single-wing door with a clear opening width of at least 110/210 cm, or a double-winged door with a clear opening width of at least 2x90/210 cm, which is sliding or which opens to the outside;
- Access handle;
- Door threshold that is not higher than 2 cm;
- Scraper and shoe cleaner made of non-shrinkable material, built-in at floor level;
- Built sliding door with a width of the light opening of at least 90 cm, in case the main entrance door is round;
- The main entrance sliding door with a clear opening of at least 90/120 cm and provided space in front of the door with dimensions of 150 x 150 cm, as shown in Figure 14;

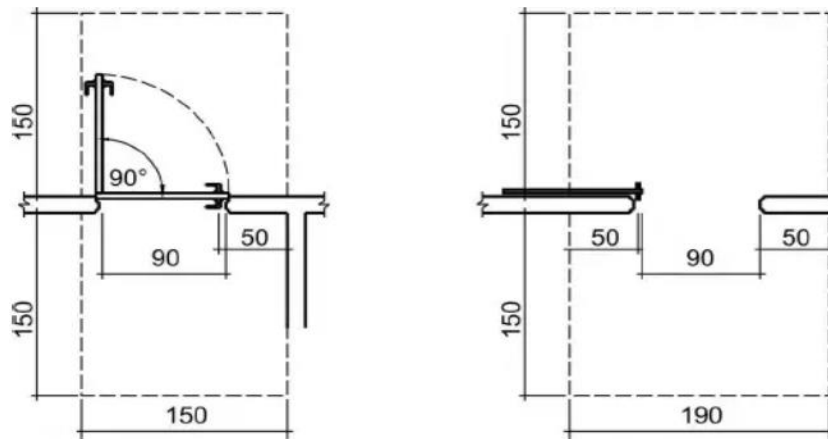


Figure 14. Required width of the door and space in front of the door

- Marking for the direction of door opening;
- Visible signs placed at a height of 90 to 160 cm, in the event that the entrance door and partition walls of the entrance area are made of glass surfaces larger than 1.5 m^2 , without obstacles;
- Windshield with a length of 240 cm;
- A passage with a semi-circular fence with a light width of at least 90 cm, at the directional entrances;
- Illumination at the level of 200 lh-luxes;
- Properly performed electrical installations;
- Installed video camera if the front door is opened with an intercom.

2. Communications should be with:

- Width of the corridor of at least 150 cm, as seen in Figure 14;
- Surfaces to be walked on at the same level;
- Walkable surfaces that are not on the same level, interconnected with appropriate accessibility elements to overcome height differences;
- Communication doors made without a threshold, with a clear width of the opening of at least 90 cm;
- Doors with access handle;
- The entrance door that leads from the communications to other spaces and rooms, apartments, etc. should be performed with a threshold that will not be higher than 2 cm;
- Visibly placed markings at a height of 90 to 160 cm, in case the entrance door and partition walls of communications are made of glass surfaces larger than 1.5 m^2 , without obstacles;
- Illumination at the level of 100 lh,-lux;
- A distance between fences of at least 90 cm, in the places where the movement is directed by fences, as seen in Figure 15;

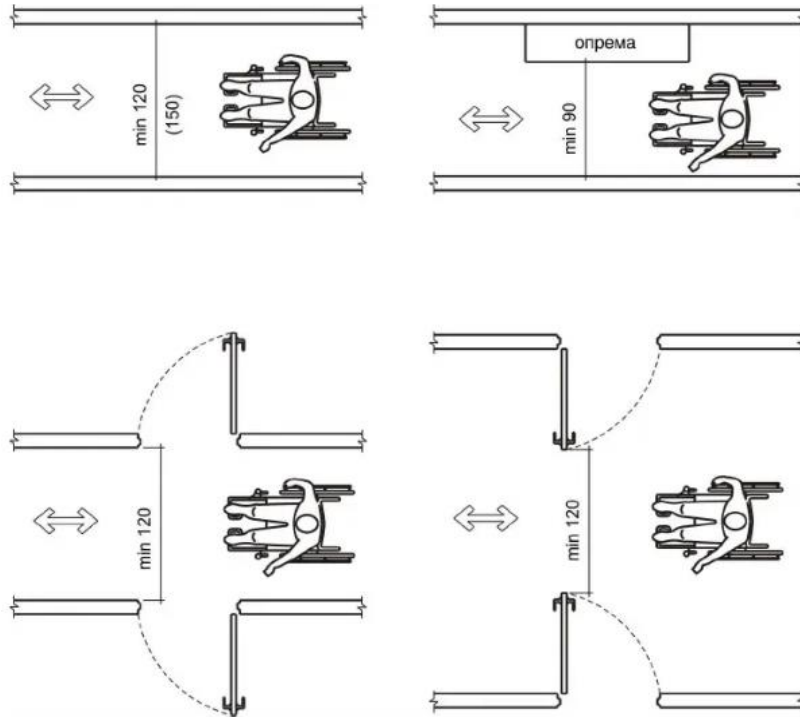


Figure 15. Required dimensions of corridors and doors in corridors

- Installation and other equipment wider than 10 cm should be built-in and, or placed in wall niches, fire extinguishers, fire hoses and nozzles;
- Appropriate electrical installations;
- Communication signs placed at a height of 120 to 160 cm.

3. The toilet, i.e. WC should have:

- A door with a clear opening width of at least 90 cm that opens to the outside;
- Access handle;
- Built-in mechanism for opening the door from the outside in case of a call for help;
- Appropriate electrical installations;
- WC together with a seat board with a height of 45 to 50 cm as shown in Figure 16;

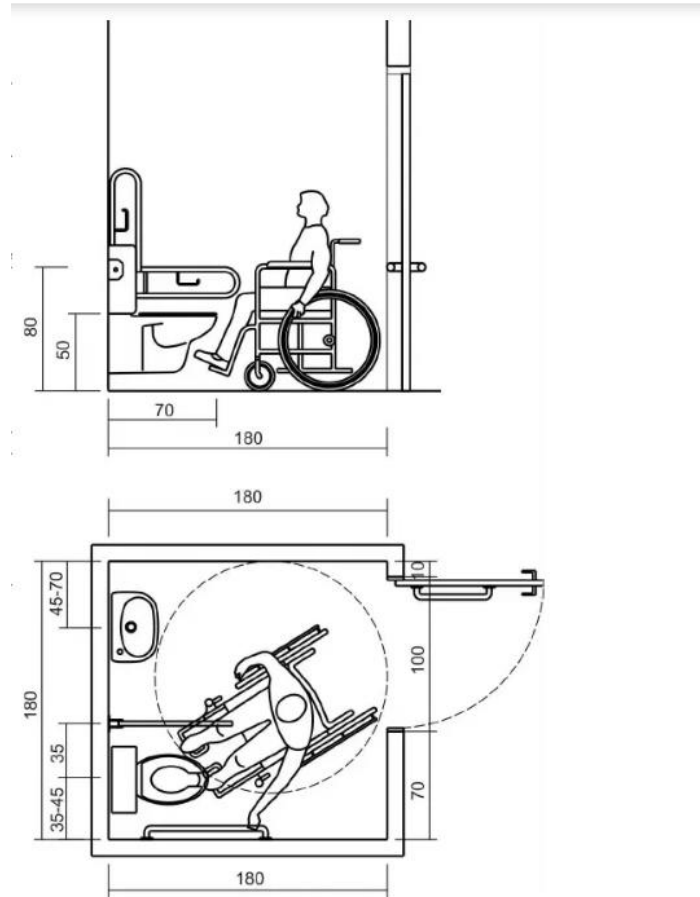


Figure 16. Dimensions for an accessible toilet

- Two 90 cm long handrails should be installed next to the toilet bowl, placed on the wall at a height of 80 to 90 cm from the floor surface;
- At least one hand holder, which should be folded, namely the one on the accessible side of the toilet bowl, and the other can be fixed to the floor;
- The distance of the front edge of the toilet bowl from the wall should be at least 65 cm;
- The device for releasing water from the WC tank should be placed at a height of 70 cm from the floor surface or a sensor release of water into the WC cup should be performed;
- A console sink with a width of at least 50 cm, placed at a height of at least 80 cm, with a siphon placed in the wall or next to the wall;
- Faucet-one-handed mixer or built-in sensor opening and closing of the water;
- Width of free space in front of the WC cup of at least 90 cm;
- Width of free space in front of the sink of at least 90 cm;
- Free space for turning a wheelchair in a radius of at least 150 cm;
- Beveled mirror whose lower edge will be placed at a height of 100 cm;
- Clothes hanger placed at a height of cm;
- Alarm device with a pressure switch or a pull cord, placed at a height of 60 cm;
- Other equipment accessible from a wheelchair, which will not interfere with movement, attached to the wall, performed in contrast to the floor and walls;

- In case the WC is in public use, there should be a separate entrance, separated from the male and female sanitary groups;
- From the entrance door of the building to the door of the public WC, a relief line of at least 40 cm wide should be made, made in relief with grooves placed in the direction of movement; and
- WC in an accessible apartment and in a room and, or apartment in the facilities-hotel, student dormitory, home for the elderly and infirm, should meet the previous conditions. The entrance door of such a WC should have a clear opening width of at least 80 cm.

When the facility is intended to employ persons with disabilities, an accessible work room and an accessible WC should be ensured.

Mandatory number of toilets and bathrooms in a home for the elderly and infirm with shared sanitary units is determined so that every 10 rooms must have 1 accessible toilet.

In a school-type and student-type hotel where there are shared sanitary units, 1 accessible WC must be provided for every 25 rooms.

4. The bathroom should have:

- Shower space without partitions with a minimum dimension of 90 x 90 cm, and a stand at a height of 75 cm or a bathtub with a height of the upper edge of no more than 50 cm and a bathtub lift;
- Handrail placed at a height of 80 to 90 cm from the floor surface, i.e. a holder next to the shower area placed at a height of 75 cm;
- Waterproof seat placed at a height of 45 to 50 cm, in the shower area;
- All equipment that is accessible from a wheelchair and will not count on movement, attached to a wall, performed in contrast to the floor and walls;
- Equipment prescribed for an accessible toilet, namely: sink, mirror, faucet, clothes hanger, alarm device, toilet seat and device for releasing water;
- A door with a clear opening width of at least 80 cm;
- A door with a clear opening width of at least 90 cm if the bathroom is entered from a public communication, e.g. in hospitals, clinics, etc.;
- Doors and windows with accessible handles.

In health-social and rehabilitation facilities, as well as in facilities that are more often used by people with disabilities, the bathtub should be accessible from 3 sides.

Mandatory number of bathrooms in a home for the elderly and infirm with shared sanitary units is determined so that every 10 rooms must have 1 accessible bathroom.

In hotels, school and student type in which there are common sanitary units, 1 accessible bathroom must be built for every 25 rooms.

5. The kitchen should have:

- A free working surface of at least 90 cm in length;
- Worktop, heating surface and cantilevered sink, with an access depth of at least 60 cm, with an upper edge at a height of at least 85 cm and a lower edge at a height of at least 70 cm;
- Hanging elements placed with the lower edge at a height of 120 cm from the floor surface;
- Lower extraction elements;

- Free space for using the kitchen elements and turning the wheelchair with a radius of at least 150 cm;
- Space for movement around the furniture with a width of at least 120 cm;
- Entrance door with a clear opening width of at least 80 cm;
- Doors and windows with accessible handles;
- Appropriate electrical installations.

6. The room, classroom and work space should have:

- Free space for turning a wheelchair in the room with the smallest radius of 150 cm;
- Space for movement around the furniture with a width of at least 120 cm;
- Work table, cantilevered, so that the upper surface is at a height of at least 85 cm, with an access depth of at least 50 cm, and the view at a height of at least 70 cm;
- The entrance door of the classroom and work space should be at least 90 cm wide at the light opening, and at least 80 cm wide at the room;
- Doors and windows with accessible handles;
- Appropriate electrical installations.

All rooms in a hospital, treatment center, as well as an institution for rehabilitation and accommodation of persons with disabilities, should be designed as accessible rooms.

The mandatory number of accessible rooms in a home for the elderly and infirm with hotel-type rooms and in a home for the elderly and infirm in which there are shared sanitary units is determined by 1 accessible room for the first 20 rooms, and for each subsequent 10 rooms are made after 1 accessible room. The total number of accessible rooms is determined by rounding the number of rooms to the next ten.

The mandatory number of accessible rooms and, or apartments in a hotel with at least 25 rooms, in tourist settlements with at least 25 apartments, in hostels with at least 25 rooms with shared sanitary units, in school and student dormitories of the hotel type, with at least 25 rooms as well as in school and student dormitories with at least 25 rooms where there are common sanitary units, it is at least 2% of the total number of rooms, and the required number is determined by rounding the decimal to the larger whole number.

The mandatory number of accessible accommodation units for persons in prison facilities is 5% of the total number of accommodation units, but not less than 1.

7. The apartment should contain the elements of independent-independent living according to the provisions for WC, bathroom, kitchen, bathroom, work space, electrical installation and doorknobs, for which access should be provided from the public pedestrian area, as a rule through the main entrance of the object, by applying the most suitable accessibility solutions to overcome height differences.

When a garage space is planned in the building in which an accessible apartment is located, adequate accessible communication should be provided from the garage space to the apartment.

A simply adaptable apartment for people with disabilities, as a rule, is built on the ground floor of the building, that is, on the floor from which it is easiest to provide a safe space in case of danger.

A simply adaptable apartment for persons with disabilities is considered an apartment in which the stipulated conditions listed below can be met, with modifications that will not affect the reliability of the object and, or the important prerequisites for the object. The

technical solution of a simple adjustable apartment should be shown in the construction project.

Apart from the previously mentioned conditions, the apartment should have:

- Entrance door with a clear opening width of at least 110 cm;
- The other doors in the apartment should have a width of the light opening of at least 80 cm;
- Doors and windows with accessible handles;
- Appropriate electrical installations;
- Rounded thresholds, not higher than 2 cm;
- Corridors with a width of at least 120 cm;
- A very important provision is that during the design and construction of the buildings of the buildings with the intention of decommissioning and with residential-business purpose, for every 10 apartments, 1 easily adaptable apartment for persons with disabilities should be provided.
- The total number of simply adjustable apartments is determined by rounding the total number of apartments to the first higher ten, but no more than 4 apartments;
- During the design and construction of tourist settlements with at least 50 apartments, apartment-type homes for the elderly and infirm with at least 20 apartments and student apartment settlements with at least 50 apartments, there should be a satisfactory number of accessible apartments, 1 accessible apartment each the minimum number of apartments, and then one for every next 20 apartments. The total number of accessible accessible suites is determined by rounding up to the first higher ten.

8. The cafe and the restaurant should contain the elements of accessibility that refer to the entrance area, communications and the toilet. In addition, they should also have:

- Provided space for movement between tables, chairs and other vertical obstacles with a width of at least 100 cm, for at least 20% of the total usable area of the cafe and restaurant, which is intended for the users of the space;
- Bar and tables, so that the upper surface is at a height of 85 cm., and the view at a height of at least 70 cm with possible access to the bar and table for at least 20% of that inventory;
- Finishing of the walls, floors and doors performed in contrast;
- Floor covering made of solid material, which does not hinder the movement of the wheelchair;
- Placed a visible sign at a height of 90 to 160 cm, in case the doors and partition walls of the bar and restaurant are made of glass surfaces larger than $1.5 m^2$, without obstacles;
- A door with an accessible handle, with a color that will contrast with the door surface.

9. The dressing room should have:

- Dimensions of at least 160 x 210 cm;
- A door with an accessible handle, with a width of the clear opening of at least 90 cm, which opens to the outside;
- Clothes hanger at a height of 120 cm;
- Folding bench, placed at a height of 45 to 50 cm.

In facilities, which should contain a changing room, 10% of the total number of changing rooms should be accessible, but not less than 1.

10. The shower cabin should have:

- Basic dimensions of at least 230 x 230 cm;
- A door with an accessible handle, with a clear opening width of at least 90 cm, which will open outwards;
- Appropriate electrical installations;
- Area of the space under the shower of at least 90x90 cm, constructed without thresholds, with a slope for water drainage;
- One-handed faucet or faucet with built-in sensor;
- Alarm device with a pressure switch or pull cord at a height of 60 cm;
- Clothes hanger placed at a height of 120 cm;
- Soap holder placed at a height of 90 cm;

In buildings that should contain a shower cabin, at least 10% accessible cabins should be constructed, counting from the total number of cabins, but not less than 1.

11. The entrance to the water at the beach and pool should have an accessible ramp, which reaches the bottom at a depth of 60 - 80 cm in relation to the middle level of the surface of the water, sea, lake, river, pool. In addition to the entrance to the water, a sunbed with the smallest dimensions of 90x200 cm and a height of 50 cm should be placed for people with physical disabilities. The mandatory number of sunbeds is 1% of the total number of sunbeds on the beach, the pool, but not less than 1.

As an exception, on beaches in treatment centers and swimming pools where accessibility cannot be ensured with an accessible entrance, such an entrance can be provided with a wheelchair, with an elevator and, or with elements of accessibility to overcome height differences.

12. The place in the auditorium should have dimensions of at least 90x140 cm and be marked with an accessibility sign.

The mandatory number of accessible seats in the auditorium is calculated according to the total number of seats, namely:

- From 100 to 300 seats, at least 2 access points are made;
- From 301 to 1,000 seats, at least 2% accessible seats are performed;
- From 1,001 and above, at least 1% access points are performed.

13. The telephone, textphone, telefax and ATM should meet the following conditions:

- The phone with the top surface and buttons should be placed at a height of 120 cm from floor level, and the handset at arm's reach at 100 cm. As an exception to these provisions, accessible telephone, textphone, telefax and ATM for blind and visually impaired persons, for deaf and hearing impaired persons, are placed at the usual height. When such devices are located inside the building, they should be accessible to the blind and visually impaired if a relief line for guidance with a width of at least 40 cm with a relief surface and grooves in the direction of movement is placed from the front door to the device;
- The textphone, telefax and ATM should be placed so that the lower edge is at a height of 70 cm from the floor level;

- The devices should be placed in a way that will allow the use of all functions of the same from the wheelchair.

14. The electrical installation should have:

- Intercom installed at a height of 110 to 120 cm with a light indicator;
- Light and bell switches placed at a height of 90 to 120 cm;
- Sockets in the accessible kitchen placed directly above the work surface;
- Other sockets placed at a height of 90 to 120 cm; and
- Main plate for electrical installation placed with the upper edge at a height of 90 to 120 cm;
- The entire electrical installation should be performed in contrast with the wall substrate.

15. The door and window handles should be model shaped, placed at a height of 90 cm for a door, and for a window the handle or the opening mechanism should be placed at a height of 90 to 120 cm.

Handling the handle to move the mechanism for opening and closing the door or window should be easy.

16. The counter for people with wheelchairs should have:

- Upper surface at a height of 85 cm, and the view at a height of at least 70 cm, cantilevered, with an access depth of at least 50 cm, as seen in Figure 17.

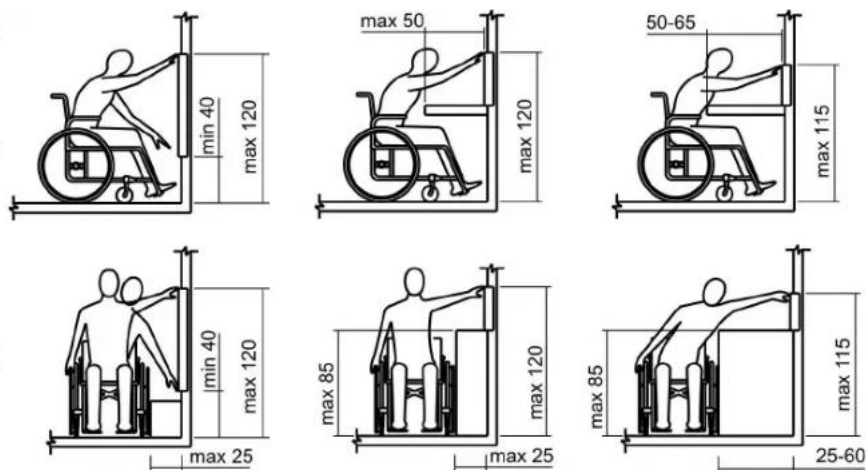


Figure 17. Dimensions of the reach zones for persons using wheelchairs to access counters

The accessible counter for the deaf, the hearing impaired, the blind and the visually impaired should have:

- Communication aid;
- Relief line for guidance with a width of at least 40 cm with a relief surface and grooves in the direction of movement from the entrance door of the facility to the counter.

When there are 3 or more counters of the same type of operation in the room, 1 of the 3 counters should meet the accessibility requirements for people in wheelchairs, and 1 for the deaf, the hearing impaired, the blind and the disabled species.

When special regulations regulating the protection in dealing with cash and valuables set conditions for the operation of counters, the accessible counter should also fulfill the conditions of that regulation.

As part of the entrance party, an access counter should be built at the following facilities: health center, hospital, treatment center, indoor swimming pool in a treatment center, closed public-healing swimming pool, home for the elderly and infirm with at least 20 rooms with a common sanitary unit, home for elderly and infirm persons with at least 20 hotel-type rooms, apartment-type home for elderly and infirm persons with at least 20 rooms, office of the service for social and health concerns for working with clients, institutions for the upbringing and education of persons with disabilities, institutions for rehabilitation, institutions for accommodation of persons with disabilities.

17. The counter for people with wheelchairs should be:

- Performed close to the space and, or the room in which the service is provided;
- Placed with the upper edge at a height of 70 cm;
- Cantilever shaped with an access depth of at least 50 cm;
- With a guaranteed access of at least 120 cm.

The access desk for deaf people, people with hearing impairment, blind people and people with visual impairment is made with the usual height, who needs who has:

- Communication aid;
- Relief line for guidance with a width of at least 40 cm with a relief surface and grooves in the direction of movement from the entrance door of the building to the counter;

When there are 3 or more counters of the same type of operation in the room, 1 of the 3 counters should meet the accessibility requirements for people in wheelchairs, and 1 for the deaf, the hearing impaired, the blind and the visually impaired.

18. An inductive node or transmission ring is installed in a room with an area greater than 500 m^2 , that is, in a room that can be used simultaneously by more than 100 people and in which speech is reproduced using a loudspeaker.

19. The bulletin board should be placed with its lower edge at a height of 120 to 160 cm.

20. The orientation plan for movement in the facility should be made in relief and should be:

- Placed horizontally or approximately horizontally at a maximum height of 90 cm, ie vertically or approximately vertically with a height of the upper edge of maximum 180 cm;
- Placed at the entrance to the facility;
- With information written in Braille;
- Placed a relief line for guidance with a width of at least 40 cm with a relief surface and with grooves in the direction of movement from the entrance door of the building to the orientation plan.

C. Elements of accessibility for independent movement in public traffic for people with wheelchairs and people with reduced mobility are: stand and platform, parking space, public pedestrian area, traffic light, pedestrian crossing, pedestrian island and intersection.

1. The stand and platform should have:

- Length at least as long as the length of the means of transport - bus, tram or train, which stops at the stand, that is, the platform, and should be at least 200 cm wide;
- Height of access to the height level of the first step of the means of transport, as seen in Figure 18;

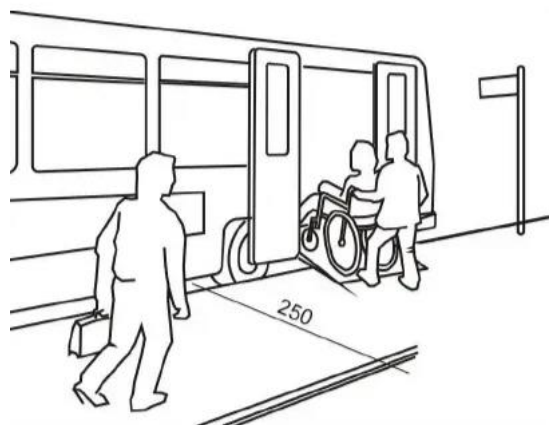


Figure 18. Pavement width in front of the entrance to a public transport vehicle

- The relief guiding line should be performed along the entire width of the approach to stands that are located near an object where people with disabilities stay more often;
- A relief warning line with a width of 20 cm, embossed with grooves placed in the direction of movement of the train, at a distance of 80 cm from the edge of the platform, along its entire length.
- At bus or tram stops, in populated areas where there is access to the means of transport, a relief line for guidance with a width of at least 40 cm and a length of 150 cm, embossed with grooves in the direction of movement, should be made, illustrated in Figure 19 below;

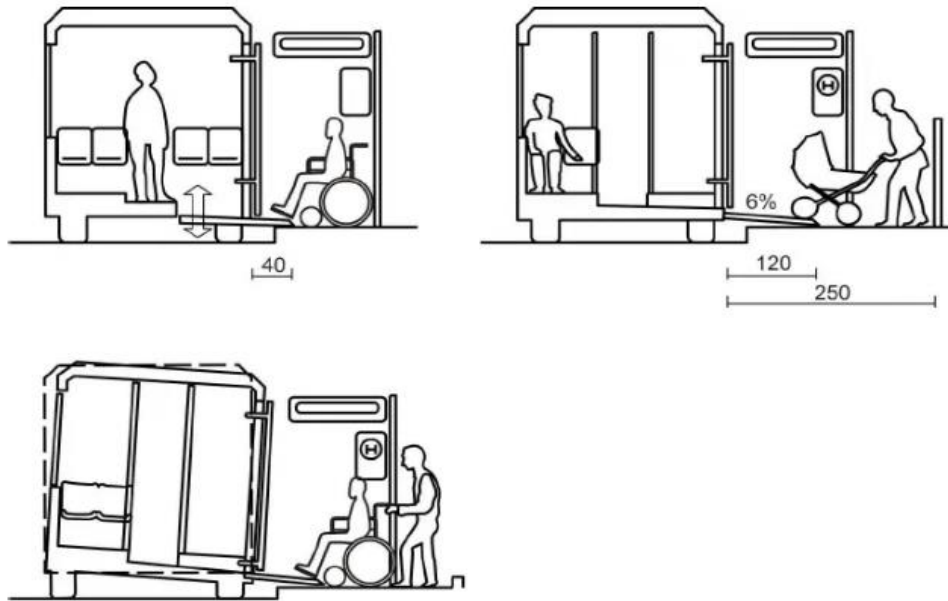


Figure 19. Examples of facilitated access in various public transport vehicles for persons with disabilities

As an exception, the access height, when vehicles with a high first step are in use, can be lower, but not lower than 18 cm from the first step of the vehicle, if a special regulation establishing the conditions for the construction of buildings from the railway infrastructure is not otherwise determined.

2. The parking place should have:

- A place for 1 car with dimensions of 370x500 cm, when it is located in a series of parking spaces and with a guaranteed condition for overcoming height differences;
- A place for 2 cars with dimensions of 590x500 cm, when it is located in a row of parking spaces, with a provided space between the cars of 150 cm and with a provided condition for overcoming height differences;
- Exit from the parking lot to an accessible area provided with sloping curbs with a slope of up to 10% and a width of at least 120 cm;
- Surface of the parking space made of material that will not hinder the movement of the wheelchair;
- Horizontal and vertical signaling according to traffic safety regulations;
- At least 3% of accessible parking spaces from the total number of parking spaces in the parking area for residential and residential-business buildings with 10 or more apartments.

3. The public pedestrian area should be:

- Raised in relation to the roadway with a flange with a height of at least 3 cm, made with typical elements, and when it is level with the roadway, it should be separated by a fence;
- With a width of at least 150 cm;
- Connected to other pedestrian areas without obstacles; and

- Protected from the street by a fence with a height of 90 cm when located in an area with increased pedestrian traffic;

The different levels of the public pedestrian areas are connected to each other with appropriate elements of accessibility to overcome height differences. Where the different levels of public pedestrian areas are connected by an accessible lift or an accessible vertical lifting platform, they should also be connected by an accessible staircase.

All communal and urban equipment - benches, tables, signs, street lighting candelabra, trash cans, bike racks, billboards, etc., should be placed along the edge of the public pedestrian area, so that it does not represent an obstacle for the blind persons and persons with visual impairment.

The entire protruding utility equipment attached to the walls of the buildings next to the public pedestrian area located at a height of 70 - 220 cm, as shown in Figure 20, and whose protrusion is greater than 10 cm, should be performed with its full length and width are up to the public pedestrian area or marked in such a way that the pedestrian area below them will increase by 3 cm in relation to the surrounding level.

When there is a bicycle path or a parking lot next to the public pedestrian area, it is necessary to make a demarcation with a deviation of at least 3 cm with a green surface, typical elements or similar.

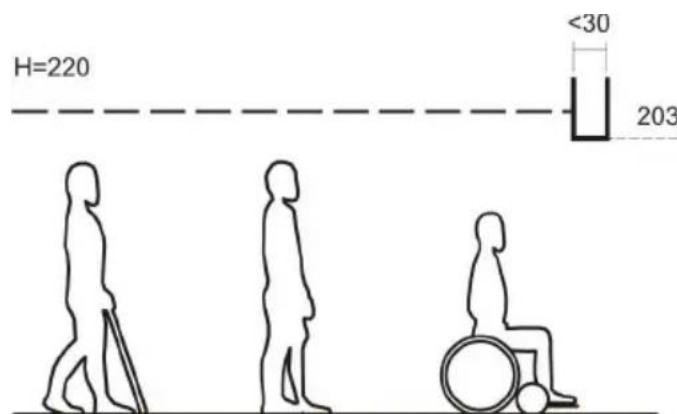


Figure 20. Dimensions for necessary free height during movement of persons with disabilities

4. The traffic light should meet the following conditions:

- If it is located at a crossing over a street that has more than 2 traffic lanes in the same direction, it should have a relief crossing plan;
- If it is located in an area where there is an object where blind and visually impaired people stay more often, there should also be sound signaling;
- If it is at an intersection, there should be sound signaling on the traffic light in one traffic direction, which does not overlap with the sound signaling placed on the traffic light for the other traffic direction;
- To have a sound signal placed on a traffic light that warns only of the change of the light, and not of the intensity of the traffic on the street; and
- Point dispersion of the sound from the sound signaling placed on the traffic light, directed in such a way as to call the blind person or the visually impaired person crossing the street.

5. The pedestrian crossing should meet the following conditions:

- The transition from the level of the sidewalk to the level of the street should be provided with a slanted curb with the maximum allowable slope of 10% and with a width of at least 120 cm;
- On the slanted curb, a relief warning field should be made of a studded structure that ends on a line parallel to the line of the street and which is separated from the street by the width of the curb, but not less than 15 cm;
- In the case of a minimum height of the pavement of 3 cm, a relief warning field should be made of a cork structure, with a width of at least 40 cm;
- In the event that there is a crossing on the street outside the intersection, the crossing should have a relief guide line with a width of at least 40 cm, with grooves placed perpendicular to the direction of the street, carried out to the inclined pavement of the crossing, and in length of at least 110 cm.

Such elements of accessibility are applied in an appropriate way also to the crossings of the traffic, railway, tram or bicycle paths.

6. The pedestrian island should meet the following conditions:

- To be performed in accordance with the provisions for pedestrian crossings;
- When the pedestrian island is level with the roadway or its level at the crossing point is lowered to the level of the roadway, then it is marked 15 cm from the beginning and 15 cm before the end with relief warning lines, with grooves perpendicular to the direction of movement, with a width of at least 40 cm interconnected by a relief guide line with grooves placed in the direction of movement with a width of at least 40 cm;
- When the pedestrian island is raised in relation to the level of the roadway, then beveling is performed as for the pedestrian crossings;
- When the pedestrian island at the crossing point is lowered to the level of the roadway, and there is a bus or tram stop on the elevated part, it is mandatory to slope to access the stop as for pedestrian crossings.

7. The intersection should contain the elements of an accessible pedestrian crossing and an accessible pedestrian island.

At the intersection, which is located in an area of the settlement where there is a building where blind people and people with visual impairment are more often staying, the pedestrian crossing should have an accessible traffic light with sound signaling and a relief guiding line with a width of at least 40 cm with grooves placed perpendicular to the street. The relief warning line should be drawn up to the slope of the curb of the crossing in a length of at least 110 cm.

When the intersection is not possible to overcome in one level, underpasses or overpasses are constructed, using appropriate elements of accessibility to overcome height differences.

4.7.5.2. Accessibility Requirements to Be Met by Different Types of Facilities

I. Buildings with public and business purposes should be designed and constructed so that, depending on their purpose, they should contain the elements of accessibility.

1. Different provisions for accessibility in the various Trade, catering and/or tourist facilities

- **Department stores**, for the entrance area, communications, toilets, the counter, the bulletin board and the orientation plan for movement;
- **Trade and service centers**, for the entrance area, communications, toilets, the desk, the bulletin board and the orientation plan for movement;
- **Self-service** with an area of at least 400 m², for the entrance area, communications, toilets and the counter;
- **Market**, for the entrance space and communications;
- **Cafe-bar, cafe and restaurant** with at least 80 seats, for the entrance area, communications, toilets and the special provisions that were specified specifically for these facilities above;
- **Disco-club and night-club** with an area of at least 400 m², for the entrance area, communications, toilets.

In a coffee bar, cafe and restaurant with less than 80 seats, disco club and night club with an area of less than 400 m², accessibility should be ensured to overcome height differences and they should have an accessible WC. If in those facilities, it is mandatory to provide only 1 WC for women and men, then it should be performed as accessible. In case of reconstruction of those objects, a deviation from the elements of accessibility can be determined, solely because the existing conditions of the object do not allow it or the conditions for accessibility from the public area to the object do not allow it.

- **Tourist information center**, for the entrance area and communications;
- **Office of a tourist community** with an area of at least 200 m², for the entrance area and communications;
- **Travel agency** with an area of at least 200 m², for the entrance area and communications;
- **Free-standing reception**, for the entrance area and bulletin board;
- **Facilities for nautical tourism**, for the entrance area, communications, toilets, bathroom or shower cabin and bulletin board;
- **A hotel with at least 25 rooms with toilets**, for the entrance area, communications, bathrooms or, the shower cabin plus toilets, provisions for the rooms, as well as the bulletin board;
- **A hotel with at least 25 rooms with shared sanitary units**, for the entrance area, communications, bathrooms, or shower cabin plus toilets, provisions for the rooms, as well as the bulletin board;
- **A hostel with at least 25 rooms with shared sanitary units**, for the entrance area, communications, toilets, bathrooms or shower room, provisions for the room and bulletin board;
- **Tourist settlement with at least 25 apartments**, for the entrance area, communications, provisions for the apartment and bulletin board;
- **Camp for at least 500 guests**, for the entrance area, communications, bathroom or shower cabin, kitchen, and bulletin board;
- **Restaurant by the main and regional road**, for the entrance area, communications and toilets;
- **Hotel with a special designation - a motel along main and regional roads**, for the entrance area, communications and toilets
- **Commercial and catering contents in the composition of gas stations**, for the entrance area, communications and toilets.

2. Facilities for postal and/or telecommunications purposes

- Postal hall for working with parties with at least 3 counters or desks for the same type of operation, for the entrance area, communications and the counter;
- Telecommunications center for providing services to users with at least 3 counters or desks for the same type of operation, for the entrance area, communications and the counter;
- Facilities that offer telecommunication services such as telephoning, faxing, etc. with at least 3 devices, for the entrance area, communications and provisions for telephone, textphone, telefax.

3. Facilities for providing services in money exchange and other financial services

- Business bank with at least 3 counters or desks for the same type of operation, for the entrance area, communications and the counter;
- Exposure of a financial agency with at least 3 counters or desks for the same type of operation, etc., for the entrance area, communications and the counter.

4. Objects of administration and similar purpose

- Facilities in which the local self-government units and/or the state administration, a Government facility, an Assembly facility, court facilities, administrative office of a legal entity with public powers, legal entities, such as the State Attorney's Office, Public Prosecutor's Office, Ombudsman operate, for the entrance area, communications, toilets, bulletin board and orientation plan for movement.

5. Facilities for health-social and rehabilitation purpose

- Premises of the service for social and health services, for the entrance area, communications, toilets, counter, inductive node or transmission ring, bulletin board and orientation plan for movement;
- **Pharmacy** and store for orthopedic aids, for the entrance area;
- Pharmacy and store for orthopedic aids with at least 3 counters or desks for the same type of operation, for the entrance area, communications, counter or desk;
- **Ambulance**, for the entrance area, communications, toilets, inductive node or transmission loop and bulletin board;
- **Health center**, for the entrance area, communications, toilets, counter, inductive node or transmission ring, bulletin board and orientation plan for movement;
- **Hospital**, for the entrance area, communications, toilets, bathroom, room, changing cabin, shower cabin, counter, bulletin board and orientation plan for movement;
- **Treatment center**, for the entrance area, communications, toilets, bathroom, room, changing cabin, shower cabin, counter, bulletin board and orientation plan for movement;
- **Indoor swimming pool** in the treatment center, for the entrance area, communications, toilets, changing cabin, shower cabin, entrance to access the pool, counter and bulletin board;
- **Open swimming pool** in the treatment center, for the entrance area, communications, toilets, changing cabin, shower cabin, entrance to access the swimming pool and bulletin board;

- **Spa treatments**, for the entrance area, communications, toilets, changing cabin, shower cabin, entrance to access the basins and bulletin board;
- **Closed bathhouse**, for the entrance area, communications, toilets, changing room, shower cabin, access to the bathhouse, counter and bulletin board and orientation plan for movement;
- **Public bathroom**, for the entrance area, communications, toilets, changing cabin, shower cabin;
- **A home for the elderly and infirm with at least 20 rooms with shared sanitary units**, for the entrance area, communications, toilets, bathroom or shower cabin, changing cabin, shower cabin, room, counter, bulletin board and orientation plan for movement;
- **Home for the elderly and infirm with at least 20 hotel-type rooms**, for the entrance area, communications, bathroom, shower room plus toilets, kitchen, changing room, room, counter, bulletin board and orientation plan for movement;
- **An apartment-type home for the elderly with at least 20 apartments**, for the entrance area, communications, apartment, counter and bulletin board;
- **Public kitchen**, etc., for the entrance area, communications, toilets and bulletin board.

6. Facilities where people with disabilities stay more often

- Facilities in which there is a business premises of the union, company and, or associations of persons with disabilities, for the entrance area, communications, toilets, kitchen, room, telephone, telefax, textphone, electrical installation, doorknobs, induction node or transmission ring, bulletin board and orientation plan for movement;
- Institutions for the upbringing and education of persons with disabilities, for the entrance area, communications, toilets, room, changing room, telephone, telefax, textphone, electrical installation, doorknobs, counter, desk, induction node or transmission ring, bulletin board and orientation movement plan;
- Institutions for rehabilitation, institutions for accommodation of persons with disabilities, etc., for the entrance area, communications, toilets, bathrooms, kitchen, room, changing cabin, shower cabin, telephone, telefax, textphone, electrical installation, doorknobs, counter, desk, bulletin board and orientation plan for movement.

7. Facilities for preschool and school education

- Kindergartens, for the entrance area and communications;
- Primary and secondary school, institution for adult education, Faculty, for the entrance area, communications, toilets, classroom and bulletin board;
- Pupil-student dormitory with at least 25 rooms with common sanitary units, for the entrance area, communications, toilets, bathrooms or shower cabins, kitchen, room and bulletin board;
- Pupil-student dormitory with at least 25 hotel-type rooms, for the entrance area, communications, bathrooms, or shower-cabinet and toilet, rooms and bulletin board;
- Student apartment complexes with at least 25 apartments, etc., for the entrance area, communications, apartment and billboard.

8. Objects for cultural purpose

- **University library**, for the entrance area, communications, toilets, desk, bulletin board and orientation plan for movement;
- **Cultural center**, for the entrance area, communications, toilets, desk, bulletin board and orientation plan for movement;
- **Congress center**, for the entrance area, communications, toilets, place in the auditorium, inductive node or transmission ring, bulletin board and orientation plan for movement;
- **Museum, gallery, exhibition space with an area of at least 300 m²**, for the entrance area, communications, toilets, desk and bulletin board;
- **Cinema, theater and concert hall with at least 100 seats for the audience, etc.**, for the entrance area, communications, toilets, place in the auditorium, inductive node or transmission ring and bulletin board.

For a museum, gallery, exhibition space with an area of less than 300 m², cinema, theater and concert hall with less than 100 seats in the auditorium, accessibility should be ensured to overcome height differences and they should have an accessible WC. If in those facilities, it is mandatory to provide only 1 WC for women and men, then it should be performed as accessible. In case of reconstruction of those objects, a deviation from the elements of accessibility can be determined, solely because the existing conditions of the object do not allow it or the conditions for accessibility from the public area to the object do not allow it.

9. Facilities for traffic purposes

- **Airport**, for the entrance area, communications, toilets, counter or desk, inductive node or transmission ring and bulletin board;
- **Bus and railway station**, for the entrance area, communications, toilets, counter or desk, inductive node or transmission loop, stand and platform, and public footpath;
- **Bus and tram stop**, railway platform, billboard, stand and platform, and public footpath;
- **Port building at the ship and ferry ports**, for the entrance area, communications, toilets, counter or desk and orientation plan for movement;
- **Lookout-residence** by the main and regional road, for communications, telephone, textphone, telefax, parking space, public footpath;
- **Public parking lot**, for a parking space;
- **A public garage** with a capacity of at least 300 vehicles, for the entrance area, communications, toilets and parking space.
In a public parking lot and in a public garage, 5% of accessible parking spaces are made in relation to the total number of parking spaces, but not less than 1.
- **Petrol pump station**, for the entrance area.

10. Sports and recreational facilities

- **Sports field**, for the entrance area, communications, toilets and a changing room;
- **A sports hall with at least 100 seats in the auditorium, etc.**, for the entrance area, communications, toilets and a changing room for members, a parking space, a place in the auditorium and a bulletin board.

11. Facilities with entertainment purpose

- **Amusement park**, for the entrance area, communications, toilets, bulletin board and orientation plan for movement;
- **Zoo, botanical garden, etc.** for the entrance area, communications, toilets, bulletin board and public pedestrian area.

12. Objects for religious and sacred purpose

- Ritual hall, for the entrance area, communications, inductive node or transmission ring and bulletin board;
- Religious center, for the entrance area, communications, toilets, room and bulletin board.

13. Facilities for serving sentences

- Institution for education, for the entrance area, communications, toilets, bathrooms, the room and the counter;
- Penitentiary, remand prison, etc., for the entrance area, communications, toilets, bathrooms, room and counter.

14. Spaces and surfaces for public purpose

- Pedestrian square, street, park path, children's playground, promenade, provisions for public pedestrian area;
- Underpass, overpass and pedestrian bridge, provisions for public pedestrian area;
- Pedestrian crossing etc., for traffic light, pedestrian perm, pedestrian island and intersection.

15. Facilities for other purposes

- Fair and exhibition center, for the entrance area, communications, toilets and bulletin board;
- Park of technology, for the entrance area, communications, toilets and bulletin board;
- Public WC, for the entrance area, communications and toilet;
- Facilities in which at least 4 WC units for public use should be installed for the entrance area, communications, toilets;
- Mortuary and crematorium, for the entrance area, communications and bulletin board;
- Public shelter, for the entrance area, communications, toilets.

II. The objects with housing purpose and with residential-business purpose should be designed and constructed so that, depending on their purpose, they contain accessibility elements for the following accessibility elements:

1. Facilities intended for housing, provisions for the entrance area, communications and the apartment;

2. Facilities with residential-business purpose, provisions for the entrance area, communications and the apartment.

Apart from these elements of accessibility, the part of the object for business use should also contain the elements of accessibility, depending on the purpose, according to which the provisions for each purpose are given and processed above.

In the facilities for public and business purpose, housing purpose, and residential and residential-business purpose, **5% accessible parking spaces** are constructed in relation to the total number of parking spaces, but not less than 1 space.

Parts of buildings for public and business purposes, which are reconstructed or obtained by conversion, should be designed and constructed in such a way that, depending on their purpose, they contain elements of accessibility in accordance with the provisions for the given purpose.

The entrance space and the communications to the parts in such buildings should be designed and executed during the reconstruction in such a way that they contain elements of accessibility for the entrance space and communications.

The provisions of this Rulebook will not be applied in the parts of the settlements and in individual buildings for which protection has been established in accordance with the regulations in the field of nature protection, if their application would jeopardize the objectives of that protection. In such a case, as a replacement for the accessibility elements to overcome the height differences, assembly-disassembly, elements for accessibility, which do not threaten the objectives of nature protection will be used.

4.7.6. Rulebook for Urban Planning

The Rulebook for Urban Planning⁷⁷ was adopted on the basis of the Law on Urban Planning and it prescribes the standards and norms for urban planning and defines the principles and methods for rational planning of sustainable settlements and buildings for the arrangement and use of space, methods and techniques of urban planning, the legal effect of planning provisions, the system of classes of purposes, as well as all protective or generative standards that ensure the fulfillment of the goals and principles of urban planning.

This rather extensive Rulebook has a separate section 13 that deals with Mobility and Accessibility Standards.

It provides **standards and guidelines for urban plans** and their contents related to persons with disabilities. According to the provisions, the creation, adoption and implementation of urban plans should ensure the overcoming of urban barriers and the provision of functional accessibility and mobility of land for general use, public spaces, to and in buildings and areas in and outside settlements for all citizens, and especially for people with disabilities and people with reduced mobility.

In this Rulebook, persons with disabilities are considered to be persons with permanent or temporary physical, mental and/or sensory impairments or demolitions, for whom urban and architectural obstacles reduce or prevent mobility, accessibility to buildings and areas, and thus participation in society on an equal basis and the realization of basic human rights.

Overcoming urban barriers and ensuring accessibility and passability of public spaces and buildings implies determining measures and planning provisions that are applied in the process of creating, adopting and implementing urban plans.

⁷⁷ Official Gazette of the Republic of North Macedonia, no. 225/2020

The subject of accessibility and passability measures, as well as overcoming urban barriers, which are an integral part of urban plans refer to:

- Public traffic and other pedestrian areas of land for general use from the groups of purpose classes D-Greenery, recreation and memorial spaces, as well as E-Infrastructure;
- Residential and residential-business buildings with 10 or more apartments from the group of purpose classes A-Housing and residence;
- Buildings for public use with institutional, business and commercial uses from the groups of use classes B-Commercial and business uses and C- Public activities and institutions.

The general rules for accessibility to buildings. Buildings for public use in urban plans should be planned with an elevation of the zero plate or with an elevation of the entrance parties that is equal to the level of the accessible sidewalks and pedestrian areas, and if unevenness is unavoidable, then measures must be changed in the building conditions and planning provisions that will provide means of unhindered accessibility, such as ramps, platforms, escalators, etc.

In the building conditions that are arranged in the urban plans for the buildings for public use, access ramps should be provided for height control of uneven surfaces for communication at the entrances of the buildings and internal ramps in public and group rooms as well as meeting rooms.

The minimum width of the ramps should be 1.20 m.

Sidewalks and pedestrian areas. The areas for the movement of pedestrians, which are planned in the urban plans, namely: sidewalks, pedestrian streets, pedestrian paths, squares, and all other types of pedestrian areas on land for general use, unless this is unavoidable due to the circumstances of the terrain, should not have unevenness, obstacles, facilities, installations and equipment that can hinder or reduce the accessibility and passability of public pedestrian spaces and access to buildings for public use.

During the implementation of urban plans, it is mandatory to overcome and remove all existing unevenness, obstacles, facilities, installations and equipment that hinder or reduce the accessibility and passability of public pedestrian spaces and access to buildings for public use on sidewalks, pedestrian streets, pedestrian paths, the squares, the squares and all other types of pedestrian areas of land for general use.

In the process of implementing urban plans, massive urban equipment, seasonal catering equipment, any partitions, structures, platforms, upgraded uneven floors, stairs, structures for covered terraces for catering purposes, parking spaces or other equipment, installations, objects or buildings that will represent architectural and urban barriers for the movement of persons with disabilities and reduced mobility, and that will narrow the prescribed free profile for movement on the sidewalk cannot be placed.

The surfaces for the movement of pedestrians that are planned in the urban plans where the terrain is on a slope should have a continuous level without stepped unevenness with a desirable longitudinal slope of 5% or in a ratio of 1:20, and in exceptional cases with a longitudinal slope of up to 8.33% or in a ratio of 1:12.

If the public pedestrian areas are on terrain with large height differences that must be overcome with stairs, the urban plan should provide for an alternative connection with a ramp

with a maximum longitudinal slope of 5% or a ratio of 1:20, and in exceptional cases up to 8.33% or in a ratio of 1:12, as shown⁷⁸ in Figure 10.

The ramp is dimensioned for two-way movement of people in wheelchairs, where its minimum width should be 1.65 m, and the optimal width should be 1.80 m.

Depending on the slope of the ramp, its length is limited for:

- Slope of 8.33% or ratio (1:12), maximum length of the ramp is 9.00 m,
- Slope of 6.66% or ratio (1:15), maximum ramp length is 12.00 m, and
- Slope of 5.0% or ratio (1:20), maximum ramp length is 15.00 m.

In cases where there is a need of a longer length of the ramps, resting spots should be planned, the minimum length of which should be 1.50 m, and the optimal length should be 1.80 m.

The largest transverse slope of sidewalks and other footpaths that is perpendicular to the direction of movement and the axis of the path is 2%.

During the implementation of the urban plans, ramps should be provided at each pedestrian crossing to overcome the unevenness between the sidewalk and the roadway.

The ramps to overcome the height difference between the sidewalk and the roadway are, as a rule, made with special inclined elements from the curbs, which are made without vertical unevenness to the level of the roadway and in the width of the entire pedestrian crossing. The maximum slope of this ramp is 8.33% or in a ratio of 1:12, and if it is technically impossible, as an exception, the slope can be up to 10% or in a ratio of 1:10.

In order to ensure the smooth movement of disabled people and people with reduced mobility on public sidewalks from the street network, **the minimum desirable width of sidewalks and footpaths** should be 2.40 m = 90 cm + 75 cm + 25 cm + 50 cm. That width is obtained by adding space modules to meet the minimum requirement for clearance of a person in a wheelchair-90 cm, a pedestrian-75 cm, a protected space to a fence or building-25 cm and a protective belt to the roadway-50 cm, as shown⁷⁹ on Figure 8.

In exceptional cases where the footpath does not border a carriageway and, or there is no urban equipment belt, the minimum width of the footpath may be 1.90m = 90 cm + 75 cm + 25 cm.

The absolute minimum width of a footpath, which is only allowed for paths that are surrounded on both sides by grass or other open space, and do not have any urban equipment, is 1.65 m = 90 cm + 75 cm.

In the corridor of basic pedestrian movements, which for the smallest width of a sidewalk or footpath is 165 cm, elements of urban equipment or other movable obstacles or seasonal equipment, such as advertising boards, catering equipment, etc., cannot be placed.

Parts of buildings that are immediately along sidewalks and footpaths, such as canopies, consoles, installations, equipment, etc., as well as elements of urban equipment and lower parts of the tree canopy must be raised at least 2.50 m in relation to on the elevation of the pedestrian surface, as much as the height of the pedestrian spatial module.

⁷⁸ On p. 159

⁷⁹ On p.181

According to the provisions on **Parking Space Dimensions**, during the development and implementation of urban plans and projects, specially sized and marked parking spaces for vehicles used by persons with disabilities and reduced mobility must be provided.

Such parking spaces should meet the following conditions:

- The smallest allowed dimension of the parking space is 3.70 m / 5.00 m;
- If the parking lot is not constructed at the same level as the sidewalk or the accessible footpath next to it, then the exit from the parking lot is ensured by a footpath or ramp with a slope of no more than 5%, and in exceptional cases with a maximum slope of up to 8.33% and a minimum width of 1.40 m;
- Parking spaces are placed closest to the entrances of nearby buildings or to vertical communications;
- The parking space must always be planned, projected and executed in a horizontal level, and never in the direction of the longitudinal slope;
- The parking space can have a horizontal slope of up to 2%.

The required number of special parking spaces for persons with disabilities is planned according to the following standards:

- For public garages, public parking lots, buildings for public use and residential and residential-business buildings with 10 or more apartments – at least 3% of the total number of parking spaces, but not less than 1 parking space;
- In public parking lots with less than 20 spaces that are located close to an ambulance, pharmacy, elementary school, kindergarten, grocery store, etc., at least 1 parking space;
- In the parking lots of gas stations, restaurants and motels along the main and regional roads, 3% of the total number of parking spaces;
- In the parking lots of hospitals, health centers, homes for the elderly and other health and social facilities, at least 5% of the total number of parking spaces, but not less than 2 spaces.

5. Conclusions and Recommendations

This Study analyzed, processed and included the accessibility of persons with disabilities as a concept through different vertical and horizontal regulations and norms, with a special focus on the accessibility of tourist services, facilities and capacities. The regulation of accessibility in the various documents as well as the connection of the global world documents from the UN and its specialized organizations, the various international standards in that sphere, with the European and the regulation of the Republic of North Macedonia, is done because it must be emphasized that the supreme principles for accessibility are given in the documents of the UN, and then they were taken on the European field, and of course on the field of the Republic of North Macedonia, and in that direction this Study was methodologically conceptualized in this way, starting from the world's relevant documents, then the European ones and finally the regulation of the Republic of North Macedonia. Through such a comprehensive approach of the Study, which is much more significant and more reliable, because it gives special weight to this Study, it was possible to finally draw relevant and confirmed conclusions, as well as recommendations regarding the compatibility of the regulation of the Republic of North Macedonia with the European , and implicitly with the global regulation of course.

Based on everything that was comprehensively covered, analyzed and processed in this Study, the following conclusions and recommendations can be made:

1. The significance of tourism, as a branch of the economy at the micro and macro level, is enormous. That's why all factors and stakeholders who can get involved in the development of tourism must do so immediately, because world trends show global crises in these times, caused by various factors - the world pandemic caused by COVID-19, the world global economic crisis, and military global threats, these are all reasons for the world to look for ways to overcome it. Tourism is a great opportunity for that. The relevant data indicate the great potential for development of the segment of the tourism market for persons with disabilities. According to the data:

- 1 billion people live with some form of disability, which is 15% of the world's population.
- By 2050, globally, 1 out of 6 people, i.e. 17% will be over 65 years of age, and in Europe and North America, 1 out of 4 people, i.e. 25% living will be over 65 or more years.
- More than 46% of the elderly, over 60, already have a disability.
- More than 250 million seniors have a moderate to severe disability.
- Passengers with disabilities tend to travel accompanied by 2 to 3 people.
- The potential market of persons with disabilities in the EU is more than 80 million people, i.e. 130 million, if senior citizens and accompanying persons are added, which is really a great, huge potential for the development of tourism in general, and especially of tourism for such persons.
- 70% of people with disabilities in the EU have financial and physical opportunities to travel, which is a huge potential, unlike other areas in the world.

These parameters clearly show in which direction all the efforts of the various stakeholders in tourism and the economy should move, and that the so-called "Accessible tourism" with the concept of "Tourism for all" should be developed.

2. Otherwise, from a normative point of view, in relation to the accessibility of persons with disabilities, and the relationship with tourism, it must be emphasized that this is a very extensive matter, which is expressed through a very broad framework, and contains numerous international, regional and national documents, with different legal weight, force and degree of obligation. This Study represents an attempt to cover the most important documents for accessibility in tourism at all levels, and therefore its weight, implication and meaning will have multiple impacts for all different stakeholders.

3. From the international documents, the Study covers numerous documents of the UN and its Specialized Organizations, especially the World Tourism Organization.

The most significant document is certainly the UN Convention on Persons with Disabilities from 2006, which emphasizes the importance of integrating disability issues into the mainstream as an integral part of relevant strategies for sustainable development. It reaffirms the position that discrimination against any person on the basis of disability is a violation of the inherent dignity and worth of the person, that the promotion of the full enjoyment of human rights and fundamental freedoms of persons with disabilities, as well as their full participation will contribute to their increased sense of belonging, and for significant progress in the human, social and economic development of every society, as well as the eradication of poverty.

The purpose of the Convention is to promote, protect and ensure the full and equal enjoyment of all human rights and basic freedoms of all persons with disabilities, as well as promoting respect for their inherent dignity.

Accessibility is one of the eight basic principles of the Convention, which requires everyone to take appropriate measures to develop, disseminate and monitor the implementation of minimum standards and guidelines for accessibility to facilities and services open or provided to the public. Private entities offering facilities and services, open or provided to the public, are required to take into account all aspects of accessibility for persons with disabilities. Various trainings are needed for the holders of the activity, in relation to the accessibility issues faced by persons with disabilities, as well as Braille signs and signs in easily readable and understandable forms in facilities and other facilities open to the public. Accessibility also means providing forms of helpers and intermediaries, including guides, readers and professional sign language interpreters, in order to simplify accessibility in facilities and other facilities open to the public. Universal design, development, manufacture and distribution and access for persons with disabilities to new information and communication technologies and systems must be promoted, as well as their accessibility at minimal prices.

According to the Recommendations for accessible tourism, which were adopted in 2013 by the World Tourism Organization, "Accessibility is a central element of any responsible and sustainable tourism policy. It is both a human rights imperative and an exceptional business opportunity. First of all, it must be understood that accessible tourism does not only benefit people with special needs, but it benefits everyone."

4. Agenda 2030 of the UN is an agenda for global action for the future years of the third decade of the XXI century, a document of crucial importance for people and the entire Planet.

The 2030 Agenda was adopted by a Resolution by the UN General Assembly in 2015, and is called Transforming Our World: The 2030 Agenda for Sustainable Development. It promotes 17 main goals for sustainable development, elaborated through 169 targets and measures, which demonstrate the scale and ambitions of this new universal agenda. Building on the Millennium Development Goals, they will try to complete what they have not achieved. Through them, it will be possible to realize the human rights of everyone.

The goals are integrated and indivisible, and balance the 3 dimensions of sustainable development: economic, social and environmental. Globally everyone in the world must cultivate peaceful, just and inclusive societies that are free from fear and violence. There can be no sustainable development without peace and no peace without sustainable development. UN member states want to create conditions for sustainable, inclusive and sustained economic growth, shared prosperity and decent work for all, taking into account different levels of national development and capacities. This means that enabling the conditions of all people equally, including persons with disabilities for their inclusion in all spheres, and of course in tourism and its related branches, are part of these global goals for sustainable development.

5. Regarding the regional European field, the Study analyzed various documents of the Council of Europe, as well as EU documents. In terms of accessibility, the most significant are: EU Directive on accessibility requirements for products and services, the so-called European Accessibility Act, adopted in 2019, and the EU Disability Strategy 2021-2030.

The purpose of the European Accessibility Act is to contribute to the proper functioning of the internal market, by approximating the laws, regulations and administrative provisions of the EU member states regarding accessibility requirements for certain products and services, in particular by eliminating and preventing barriers for the free movement of certain accessible products and services, resulting from the different accessibility requirements in the member states. It will increase the accessibility of available products and services in the internal market and improve the availability of relevant information.

The demand for accessible products and services is high and the number of people with disabilities is predicted to increase significantly. An environment where products and services are more accessible enables a more inclusive society and facilitates independent living for people with disabilities. In this context, it should be taken into account that the prevalence of disability in the EU is higher among women than among men. Other persons who have functional limitations, such as: the elderly, pregnant women, or persons traveling with luggage, also benefit from this directive. The concept of "persons with functional limitations", as referred to in this Directive, includes persons who have any physical, mental, intellectual or sensory impairment, age-related impairment or other reasons related to the performance of the human body, permanent or temporary, which, in interaction with various barriers, result in their reduced access to products and services, leading to a situation that requires those products and services to be adapted to their special needs.

Equality Union: Strategy for the Rights of Persons with Disabilities in the EU 2021-2030, focuses on several aspects of the accessibility issue, namely:

- Accessibility,
- Enjoying EU rights,
- Decent quality of life and independent living,
- Equal access and non-discrimination,
- Promoting the rights of people with disabilities on a global level,

- Effective implementation of the Strategy,
- Leading by example,
- Awareness, management and measurement of progress, and
- Conclusion.

To make the EU barrier-free, Member States should include accessibility in all relevant policies and activities, and professionals should receive accessibility training. At the EU level, great attention will be paid to the correct implementation and evaluation of all EU rules governing accessibility, and gaps and the need for further normative action will be identified. Action at the EU level will also include further work on standardization and technical specifications.

6. There is a wide range of international standards on this matter, all significant in different aspects, but certainly the most relevant standard is the new standard from 2021, ISO 21902:2021 Tourism and related services — Accessible tourism for all — Requirements and recommendations. It is a standard that provides appropriate guidance and recommendations to assist accessibility provisions, covering a wide range of policy-making, strategy, infrastructure, products and services relevant to the entire tourism supply chain. It is applicable to all types of stakeholders in tourism. Its purpose is to ensure through it:

- Equal access and enjoyment in tourism;
- From the widest range of people;
- Of all ages and abilities.

The standard includes:

- Basic requirements;
- Policies and strategies;
- Transportation:
- Urban and rural tourist areas;
- Free activities;
- Meetings, initiatives, conventions and exhibitions;
- Accommodation;.
- Food and beverage services;
- Tour operators and travel agencies.

There are 8 Annexes to the standard which refer to:

- The 7 principles and 29 directions of Universal Design;
- Tables for using principles and guidelines for universal design in the design of communications in tourism;
- Color contrast;
- The reception;
- Accessible public toilets;
- The port of guest rooms in accommodation facilities;
- Information about the property;
- International Air Transport Association-IATA codes

Analyzing the standards for enabling greater accessibility for people with disabilities in tourism, and the various aspects that they provide and determine, in fact all standards participate in the achievement of the Global Goals for Sustainable Development from the 2030 Agenda, which in itself means that this activity is a very high priority and has a great impact at the global level, and it should be followed to the micro-level, within all the member states of the UN.

In particular, this standard must be promoted to the various stakeholders for this activity in the Republic of North Macedonia, its provisions and the advantages of its implementation must be explained to them. Its application is on a voluntary basis, which allows the perception of the most positive aspects of its use, only by those subjects who are most ready to implement its standards, and to help themselves and give their activity a chance, through the application of the globally recognized standards and policies, to open more widely their fields of attraction to a greater number of visitors and tourists, because the adaptation, design and implementation of accessibility in tourism not only provides opportunities for people with disabilities, but it greatly expands the scope and quality of services and products for all people regardless of their characteristics.

7. The regulation of the Republic of North Macedonia regarding accessibility is composed of a multitude of regulations and acts. In this Study, the Constitution, several reports, action plans, strategies, twenty laws, and six by-laws were analyzed. So a wide range of national rules and regulations is taken into account. In all documents and acts without exception, there is a commitment to equality, non-discrimination, respect for human freedoms and rights to the widest possible extent, care for all persons is equal and persons with disabilities are treated as a great potential of the country. The most specific provisions for those persons and the right of access are given in the by-laws, which are derived from the relevant laws, and emphasis is given to the greatest possible extent, especially in the provisions of the by-laws.

8. Analyzing the situation in this sphere, 6 by-laws were taken into account, namely:

- Rulebook on minimum technical conditions for carrying out tourist activity;
- Rulebook on minimum technical conditions for catering activity;
- Rulebook on conditions for categorization of facilities for catering activity;
- Rulebook on the technical characteristics and dimensions of the path of movement of persons with physical disabilities and visually impaired persons;
- Rulebook on the method of ensuring unhindered access, movement (horizontal and vertical), stay and work of persons with disabilities, to and in, buildings with public and business purposes, buildings for housing in residential buildings, as well as buildings with residential and business purposes ;
- Rulebook on urban planning.

9. In terms of accessibility, 3 regulations are entirely dedicated to the most specific needs and requirements for accessibility of persons with disabilities, namely: the Regulations on the technical characteristics and dimensions of the path of movement of persons with physical disabilities and visually impaired persons; The Rulebook on the method of ensuring unhindered access, movement (horizontal and vertical), stay and work of persons with disabilities, to and in, buildings with public and business purposes, buildings for housing in residential buildings, as well as buildings with residential and business purposes; and the Rulebook for Urban Planning.

From the analysis of the provisions of the regulations, it can be concluded that the de jure regulation of the Republic of North Macedonia is very comprehensive, consistent, compatible with the world and European regulation. It lacks better implementation, consistency in the implementation of the provisions and standards that are prescribed, as well as more funds for that purpose, so that it can be said that the standards of the Republic of North Macedonia

are closer to and have reached the world standards for accessibility of persons with disabilities.

10. The overall regulation of the Republic of North Macedonia, in general, *de lege* and *de jure*, is indeed a good framework for improving accessibility, but, as has been mentioned several times, proper and consistent implementation must be taken into account.

All relevant stakeholders must insist on implementing the regulation in a correct way and completely, because accessibility is one of the basic principles of the UN Convention, the 2030 Agenda, the EU Strategy for Persons with Disabilities 2021-2030, and all international standards.

This must be taken into account, because tourism relies on these resources, it is about a large number of people with disabilities, who are a huge potential for the whole world, in every sense, there must not be any discrimination, on the contrary, it must be seen as an opportunity for greater growth and development.

11. It would be good to propose measures by which the state or local self-government could provide a certain type of assistance to all tourism stakeholders during the performance of certain processes to increase the accessibility of facilities, services and products for people with disabilities, whether in the form of subsidization, whether in the form of a reduction of certain fiscal charges for such activities, or simply through the appropriate promotion of such good practices and their appropriate recognition by the wider community, in order to increase awareness of the importance of increased accessibility for all.

12. One such very good example from practice is the published Public call for the use of funds for adaptation, construction or installation of infrastructure and equipment for physical accessibility, from the municipality of Bitola, which includes opportunities for adaptation of already existing or construction of new accessible ramps, or procurement and installation of fixed or portable access ramps, platforms and elevators, devices for climbing stairs with wheelchairs, in the home of persons with disabilities, in order to overcome height distances or other physical obstacles or barriers to and in the home, adaptation of parts of the home through adaptation in the physical space - adapting a toilet, changing doors with a suitable width for a wheelchair, making accessible paths, etc., as well as purchasing equipment that is adapted for use by persons with disabilities that will facilitate the mobility and functionality of persons with disabilities in their home.

It provides funds for that purpose, through the Social Protection Program for 2022 of the Municipality of Bitola for the adaptation, construction or installation of infrastructure and equipment for physical accessibility in the home of persons with disabilities, and by subsidizing the costs, in whole or in part, it is possible to facilitate the persons who would apply, thereby helping in the smooth movement and functioning of each individual in his home.

Through a prescribed procedure in the relevant Rulebook, subsidies are provided for funds for adaptation or construction and installation of infrastructure and equipment for physical accessibility to and in the home of persons with disabilities, the opportunity to use the funds is provided. The procedure includes various stages, from the submission of requests, their consideration, approval, all the way to the performance of the infrastructure and equipment itself.

The use of infrastructure funds for physical accessibility in the home can be in the maximum net amount of MKD 61,500.00, ie €1,000, or full coverage of an amount up to this amount. The sums that are above this amount are borne by the applicant-beneficiary of the adaptation.

The call for the use of funds for infrastructure for physical accessibility in the home will continue until the funds provided for this activity are fully used.

Regarding the conditions for using funds for infrastructure for physical accessibility in the home, they can be requested by:

- A person with a disability who, due to the nature of his condition, is unable to independently climb stairs, overcome height distances and other physical obstacles and barriers to and in the home, a citizen of the Republic of North Macedonia, who possesses a valid ID card with a residential address in the Municipality of Bitola.
- For minors or a person assigned a guardian, the request is submitted by one of the parents or the guardian.
- It is recommended that the applicant do research on the amount of adaptation in his home before submitting the application.
- Persons with a residential address outside the Municipality of Bitola must submit a notarized statement about the initiated procedure for changing the residential address in the Municipality of Bitola, which will take place no later than 6 months from the day of putting the accessible infrastructure facility into operation.
- For a residence in and to which there is no or no functional accessibility.
- For a dwelling for which accessibility is provided in one part of it, but for another part of the dwelling such accessibility does not exist, e.g. accessibility for the 1st floor already exists, but accessibility for the 2nd floor, or to auxiliary rooms, etc. does not exist,
- Residence in and to which infrastructure for physical accessibility exists, but it needs to be adapted.

In terms of technical characteristics and standards for the adaptation subject to the use of financial assistance for accessibility in the homes of the beneficiaries, the infrastructure for physical accessibility to and in the home that will be adapted or built from solid construction should meet certain conditions in terms of technical characteristics in accordance with the Law on Construction, with the aim of maintaining construction standards and ensuring functionality and safety for users. Infrastructure for physical accessibility to and or in the home that is equipment to be procured, installed or installed, eg access ramp made of metal, iron, sheet metal, corrosion-resistant aluminum, equipment, platform, etc., must be according to the existing norms and requirements for it.

Certain photographs, statement of malfunction, e.g. whether there is a large slope, dilapidation, if it is a question of adaptation of a toilet, the purchased equipment should be in accordance with the needs of the user, height of the toilet bowl, height of the washbasin, dimensions of the toilet.

Commission for the implementation of the procedure.

13. Another current example of positive practice in relation to persons with disabilities is the latest project from March 2022, which will reconstruct apartments for the accommodation of persons with disabilities in Ohrid. On the eve of the new tourist season, 10 apartments in Ohrid will be reconstructed, through the Center for the Development of the Southwest Planning Region, approved by the Ministry of Local Self-Government, i.e. the Bureau for

Regional Development. The reconstruction, which includes several components, will raise the level of the energy efficiency of the buildings by changing the external and internal carpentry, increased insulation, and operations will also be carried out for the internal rearrangement and modernization of the buildings. It is expected that in the course of several months in Ohrid, in the reconstructed apartments, around 700 people with disabilities will be accommodated.

14. For the realization of these highly humane and civilized ideas, it is necessary for all stakeholders, and those who are more, as well as those who are less relevant and involved in that process, it is necessary for all subjects, legal entities, institutions, academic community, organizations, citizens' associations, non-governmental sector, as well as each individual individually - let's all contribute to the achievement of the goal, greater accessibility for people with disabilities.

* * *

We all must help and contribute to the realization of this blessed idea and set of moral values, but there must be a certain period for that. It must be done gradually, over time, because nothing can be achieved quickly and overnight. The most important thing is the will, the desire and the dedication to be the guides in its realization, and the result and the recognition of the work will certainly come. When all stakeholders say that they are satisfied and that everything is going in the right direction, then the most relevant indicators should be the various associations of people with disabilities and their recognition, if, how much, when and to what extent progress is made. Only with such an inclusive approach it will surely succeed!

6. References

Constitution of the Republic of North Macedonia, Official Gazette of the Republic of North Macedonia, No. 6/2019

National strategy for the equalization of persons with disabilities in the Republic of North Macedonia 2010-2018

Concluding observations on the initial report of the Republic of North Macedonia, UN Committee on the Rights of Persons with Disabilities, 29 October 2018

Annual report on the work of the National Coordinating Body for the Implementation of the UN Convention on the Rights of Persons with Disabilities under the Government of the Republic of North Macedonia for 2019, February 2020.

Action plan for 2021 for the implementation of measures from the UN Convention on the Rights of Persons with Disabilities, National Coordinating Body for the Implementation of the UN Convention, 2021

Law on ratification of the convention on the rights of persons with disabilities and the optional protocol to the convention on the rights of persons with disabilities, Official Gazette of the Republic of Macedonia, no. 172/2011

Construction Law, Official Gazette of the Republic of North Macedonia, No. 130/2009, 124/10, 18/11, 36/11, 54/11, 13/12, 144/12, 25/13, 79/13, 137 /13, 163/13, 27/14, 28/14, 42/14, 115/14, 149/14, 187/14, 44/15, 129/15, 217/15, 226/15, 30/16 , 31/16, 39/16, 71/16, 132/16, 35/18, 64/18 and 168/18, 244/19, 18/20, 279/20

Law on urban planning, Official Gazette of the Republic of North Macedonia, no. 32/20

Law on Social Protection, Official Gazette of the Republic of North Macedonia, no. 104/19, 146/19, 275/19, 302/20, 311/20, 163/21, 294/21

Child Protection Law, Official Gazette of the Republic of North Macedonia, no. 23/13, 12/14, 44/14, 144/14, 10/15, 25/15, 150/15, 192/15, 27/16, 163/17, 21/18, 198/18, 104/ 19, 146/19, 275/19 and 311/20, 294/21

Family Law, Official Gazette of the Republic of North Macedonia, no. No. 80/1992, 9/1996, 38/2004, 33/2006, 84/2008, 67/10, 156/10, 39/12, 44/12, 38/14, 115/14, 104/15, 150 /15, 53/20

Law on Prevention and Protection from Discrimination, Official Gazette of the Republic of North Macedonia, no. 258/2020

Law on tourism activity, Official Gazette of the Republic of North Macedonia, no. 2/2004, 89/2008, 12/2009, 17/11, 47/11, 53/11, 123/12, 164/13, 27/14, 116/15, 192/15, 53/16, 31/ 20

Law on Catering Activity, Official Gazette of the Republic of North Macedonia, no. 62/04, 89/08, 115/10, 53/11, 141/12, 164/13, 187/13, 166/14, 199/14, 129/15, 192/15, 39/16, 53/ 16, 71/16, 31/20

Law on Basic Education, Official Gazette of the Republic of North Macedonia, no. 161/19, 229/20

Law on secondary education, Official Gazette of the Republic of North Macedonia, no. 4/95, 24/96, 34/96, 35/97, 82/99, 29/2002, 40/2003, 42/2003, 67/2004, 55/2005, 113/2005, 35/2006, 30/ 2007, 49/2007, 81/2008, 92/2008, 33/10, 116/10, 156/10, 18/11, 51 12, 100/12, 24/13, 41/14, 116/14, 135 /14, 10/15, 98/15, 145/15, 30/16, 127/16, 67/17, 64/18, 229/20

Law on Vocational Education and Training, Official Gazette of the Republic of North Macedonia, N.71/2006, 117/2008, 148/2009, 17/11, 24/13, 137/13, 41/14, 145/15, 55/ 16, 64/18, 275/19

Law on Higher Education, Official Gazette of the Republic of North Macedonia, no. 82/18, 178/21

Law on Mental Health, Official Gazette of the Republic of Macedonia, No. 71/07, 150/15

Health Care Law, Official Gazette of the Republic of North Macedonia, no. 43/12, 145/12, 87/13, 164/13, 39/14, 43/14, 132/14, 188/14, 10/15, 61/15, 154/15, 192/15, 17/ 16, 37/16, 20/19, 101/19, 153/19, 180/19, 275/19, 77/21 and 122/21, 178/21

Health Insurance Law, Official Gazette of the Republic of North Macedonia, no. 25/2000, 34/2000, 96/2000, 50/2001, 11/2002, 31/2003, 84/2005, 37/2006, 18/20 36/2007, 82/2008, 98/2008, 6/2009 , 67/2009, 50/10, 156/10, 53/11, 26/12, 16/13, 91/13, 187/13, 4 14, 44/14, 97/14, 112/14, 113/ 14, 188/14, 20/15, 61/15, 98/15, 129/15, 150/15, 154/15, 192/15, 217/15, 27/16, 37/16, 120/16, 142/16, 171/17, 275/19, 77/21, 285/21

Law on Employment of Disabled Persons, Official Gazette of the Republic of North Macedonia, No. 44/2000, 16/2004, 62/2005, 113/2005, 29/2007, 88/2008, 161/2008, 99/2009 /11, 129/15, 147/15, 27/16, 99/18, 103/21

Law on Labor Relations, Official Gazette of the Republic of North Macedonia, No. 62/2005, 106/2008, 161/2008, 114/2009, 130/2009, 50/10, 52/10, 124/10, 47/11, 11/12, 39/12, 13/13, 25/13, 170/13, 187/13, 113/14, 20/15, 33/15, 72/15, 129/15, 27/16, 120/ 18, 110/19, 267/20, 151/21, 288/21

Law on Disabled Organizations, Official Gazette of the Republic of North Macedonia, No. 89/2008, 59/12, 23/13, 150/15, 27/16, 317/20

Law on the use of sign language, Official Gazette of the Republic of North Macedonia, no. 105/2009, 150/15, 30/16, 103/21

The Law on Culture, Official Gazette of the Republic of North Macedonia, no. 31/1998, 49/2003, 82/2005, 24/2007, 116/10, 47/11, 51/11, 136/12, 23/13, 187/13, 44/14, 61/15, 154/ 15 and 39/16, 11/18

Law on Museums, Official Gazette of the Republic of North Macedonia, no. 66/2004, 89/2008, 116/10, 51/11, 88/15, 152/15 and 39/16, 103/21

The Law for the Protection of Cultural Heritage, Official Gazette of the Republic of North Macedonia, no. 20/2004, 71/2004, 115/2007, 18/11, 148/11, 23/13, 137/13, 164/13, 38/14, 44/14, 199/14, 104/15, 154/ 15, 192/15, 39/16 and 11/18, 20/19

Rulebook on minimum technical conditions for carrying out tourist activity, Official Gazette of the Republic of Macedonia no. 16/2006

Rulebook on minimum technical conditions for catering activities, Official Gazette of the Republic of Macedonia, no. 16/2006, 44/2013

Rulebook on conditions for the categorization of facilities for catering activities, Official Gazette of the Republic of Macedonia, no. 16/2006, 87/12, 41/13

Rulebook on the technical characteristics and dimensions of the movement path of persons with physical disabilities and visually impaired persons, Official Gazette of the Republic of Macedonia, No. 17/2015

Rulebook on the method of ensuring unhindered access, movement (horizontal and vertical), residence and work of persons with disabilities, to and in, buildings with public and business purposes, buildings for housing in residential buildings, as well as buildings with residential and business purposes, Official Gazette of the Republic of Macedonia, No. 17/2015

Rulebook for urban planning, Official Gazette of the Republic of North Macedonia, no. 225/2020

Rulebook for the use of funds from the social protection program of the municipality of Bitola in the section of infrastructure for persons with disabilities in the home of the persons, municipality of Bitola, January, 2022.

Decision on the establishment of a National Coordinating Body for the implementation of the United Nations Convention on the Rights of Persons with Disabilities, Official Gazette no. 69/2018

World Tourism Organization (2013), Recommendations on Accessible Tourism, UNWTO, Madrid

World Tourism Organization (2016), Recommendations on Accessible information in Tourism, UNWTO, Madrid

World Tourism Organization (2016), Accessible Tourism for All: An Opportunity within Our Reach, UNWTO, Madrid

World Tourism Organization (2020), Framework Convention on Tourism Ethics, UNWTO, Madrid

World Tourism Organization (2020), UNWTO Inclusive Recovery Guide – Sociocultural Impacts of Covid-19, Issue I: Persons with Disabilities, UNWTO, Madrid,

Union of Equality: Strategy for the Rights of Persons with Disabilities 2021-2030, March 2021 Brussels

<https://www.e-unwto.org/>

<https://www.statista.com/statistics/209334/total-number-of-international-tourist-arrivals/>

<https://tourismmacedonia.gov.mk/statistika/?lang=en>

<https://www.e-unwto.org/doi/book/10.18111/9789284422296>

<https://mk.freejournal.info/1252857/1/povelbi-na-obedinetite-natsii.html>

<https://www.healthrights.mk/pdf/Pravnici/Megjunarodni%20dokumenti%20i%20mehanizmi%20za%20zastita%20na%20covekovite%20prava/%D0%9EN/1%20-%20%D0%A3%D0%BD%D0%B8%D0%B2%D0%B5%D1%80%D0%B7%D0%B0%D0%BB%D0%BD%D0%B0%20%D0%B4%D0%B5%D0%BA%D0%BB%D0%B0%D1%80%D0%B0%D1%86%D0%B8%D1%98%D0%B0%20%20%D0%B7%D0%B0%20%D1%87%D0%BE%D0%B2%D0%B5%D0%BA%D0%BE%D0%B2%D0%B8%D1%82%D0%B5%20%D0%BF%D1%80%D0%B0%D0%B2%D0%B0.pdf>

<http://bezomrazno.mk/wp-content/uploads/2013/10/Megjunaroden-pakt-za-gragjanski-i-politicki-prava.pdf>

<https://www.aktiv.mk/com-akeeba/resursi/dokumenti/pravila-i-zakoni/megjunarodni/218-megjunaroden-pakt-za-ekonomski-socijalni-i-kulturni-prava>

<https://www.w3.org>

<https://www.w3.org/WAI/standards-guidelines/wcag>

https://www.who.int/health-topics/ageing#tab=tab_1

<https://www.iso.org/standard/71860.html>

<https://www.iso.org/standard/46429.html>

<https://www.iso.org/standard/41687.html>

<https://sdgs.un.org/2030agenda>

<https://www.coe.int/mk/web/skopje/the-council-of-europe>
https://www.echr.coe.int/Documents/Convention_MKD.pdf
https://www.mtsp.gov.mk/WBStorage/Files/European%20social%20charter%20_revised_%20MKD%20translation.pdf
<https://pace.coe.int/en/files/17074/html>
<https://pace.coe.int/en/files/21554>
<https://ec.europa.eu/social/main.jsp?catId=1137>
<https://www.healthrights.mk/pdf/Pravnici/Regionalni%20dokumenti%20i%20mehanizmi%20za%20zastita%20na%20covekovite%20prava/Evropska%20Unija/1.%20%D0%9F%D0%BE%D0%B2%D0%B5%D0%BB%D0%B1%D0%B0%20n%D0%B0%20%D0%BE%D1%81%D0%BD%D0%BE%D0%B2%D0%BD%D0%B8%D1%82%D0%B5%20%D0%BF%D1%80%D0%B0%D0%B2%D0%B0%20%D0%BD%D0%B0%20%D0%95%D0%B2%D1%80%D0%BE%D0%BF%D1%81%D0%BA%D0%B0%D1%82%D0%B0%20%D1%83%D0%BD%D0%B8%D1%98%D0%B0.pdf>
<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32000L0078>
<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A12012E%2FTXT>
https://www.base-uk.org/sites/default/files/%5Buser-raw%5D/11-06/european_disability_strategy_2010-2020_en.pdf
https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2016.327.01.0001.01.ENG
https://www.etsi.org/deliver/etsi_en/301500_301599/301549/01.01.02_60/en_301549v010102p.pdf
<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32019L0882>
<https://ec.europa.eu/social/main.jsp?catId=1139>
<https://ec.europa.eu/social/main.jsp?catId=738&langId=en&pubId=8407&furtherPubs=yes>
https://europa.eu/youreurope/citizens/travel/transport-disability/parking-card-disabilities-people/index_en.htm
<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32008H0205>
<https://www.iso.org/standard/57385.html>
<https://www.iso.org/standard/55038.html>
<https://www.iso.org/standard/52329.html>
<https://www.iso.org/standard/58086.html>
<https://www.iso.org/standard/76106.html>
<https://www.iso.org/standard/72126.html>
<https://www.iso.org/standard/78847.html>
<https://www.iso.org>, ISO 26800, ISO/TR 9241-100, ISO/TR 22411
<https://population.un.org/ProfilesOfAgeing2019/index.html>