



REPUBLIC OF  
SLOVENIA



HUMAN  
RIGHTS  
OMBUDSMAN

SPECIAL REPORT

**ACCESSIBILITY  
OF CENTRES FOR SOCIAL WORK  
FOR PEOPLE  
WITH MOVEMENT AND SENSORY  
IMPAIRMENTS**

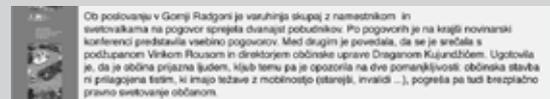


### 8. Osebam na invalidskih vozčkih onemogočeno neposredno spremljanje sej Državnega zbora

V pobudi, naslovljeni na Varuha človekovih pravic RS, smo bili opozorjeni, da osebam na invalidskih vozčkih ni omogočen dostop do balkona velike dvorane Državnega zbora RS (DZ), kjer je zainteresirani javnosti omogočeno neposredno spremljanje sej DZ.

Varuh je DZ opozoril na pravico do enakega obravnavanja in dolžnost zagotavljanja razumne prilagoditve za invalide osebe, ki pomeni zahtevo po nujnih, primernih in sorazmernih prilagoditvah, ki so v posameznem primeru potrebne, da se osebi z invalidnostjo odpravijo ovire in prepreke za enako in polno uživanje vseh pravic. Kršitve te obveznosti pomenijo diskriminacijo, storjeno z opustitvijo. Varuh je izrazil mnenje, da bi DZ moral omogočiti dostop do spremljanja sej vsem brez razlik. Namestitve dvigala, ki omogoča dostop in s tem spremljanje sej DZ osebam na invalidskem vozčku, bi bila vsekakor lahko razumna in potrebna rešitev. Poleg izpolnitve pravne obveznosti smo opozorili tudi na zgled in sporočili, ki ga morajo pri aktivnem preprečevanju diskriminacije v javnosti dajati najvišje državne institucije.

V odgovoru je DZ pojasnil, da so kot trenutno rešitev namestili klančino, ki invalidnim osebam omogoča dostop do balkona velike dvorane. V najkrajšem možnem času bodo proučili tehnične in gradbene možnosti za namestitev dvigalne ploščadi, ki bo dolgotrajnejša in ustrežnejša rešitev dostopa za osebe na invalidskih vozčkih in s tem enakopravno varstvo pravic. Odziv DZ ocenjujemo kot ustrezen. 10. 06. 2007



Ob poslovanju v Gornji Radgani je varuhinja skupaj z namestnikom in svetovalkama na pogovor sprejela dvanajst pobudnikov. Po pogovoru je na kraju novinarski konferenčni predstavitelja vsebino pogovora. Med drugim je povedala, da se je srečala s podžupanom Vinkom Roušom in direktorjem občinske uprave Dragonom Kujančičem. Ugotovila je, da je občina prijazen ljudem, kljub temu pa je opozorila na dve pomankljivosti: občinska stavba ni prilagojena tistim, ki imajo težave z mobilnostjo (starije, invalidi ...), pregleda pa tudi brezplačno pravno svetovanje občanom.



### 2.1.3 Posebej o fizični dostopnosti sodišč za invalide

Ob obravnavi ene izmed pobud smo lahko razbrali, da [okrajno] sodišče nima urejenega fizičnega dostopa za invalide. V konkretnem primeru, v katerem je bil oškodovanec invalidna oseba, je bila zato obravnavna zadeva prestavljena na drugo sodišče, kjer je takšen dostop za invalide urejen.

**Omogočanje dostopa do objektov v javni rabi za invalide je pomemben element zagotavljanja enakih možnosti invalidov.** Ker Varuh lahko skladno s drugim odstavkom 9. člena ZVarCP obravnava tudi širša vprašanja, ki so pomembna za varstvo človekovih pravic in temeljnih svoboščin ter za pravno varnost v Republiki Sloveniji, smo se odločili vprašanje **dostopnosti sodišč za invalide odpreti kot takšno širše vprašanje.** Dejanska dostopnost sodišč za invalide je namreč pomembna tako glede udeležencev v sodnih postopkih kot tudi za druge. Lahko gre za vabljene stranke (tožniki, toženci, obdolženci, njihovi zagovorniki, priče, oškodovanci ipd.), za sodno osebo ali pa za javnost v najširšem smislu (za član URS določa, da so sodne obravnave javne). Zagotavljanje dostopnosti (in) razpravnih dvoran kot takih je torej nezadostno – že stranke morajo imeti poleg dostopa v razpravne dvorane omogočen tudi dostop npr. do sprejemne pisarne, zemljiške knjige, sodnega registra, pisarn sodnih vpisnikov, službe za brezplačno pravno pomoč... Za invalide morajo biti dostopni prostori stavb, v katerih posluje sodišče, tudi zato, ker sicer ni mogoče govoriti o dejanskem spoštovanju prepovedi diskriminacije na podlagi invalidnosti iskalcev zaposlitve in sodnega oseba v času trajanja delovnega razmerja. Ne nazadnje pa je tudi zaradi omogočanja dostopnega opravljanja osnovnih fizioloških potreb pomembno, da je zagotovljena tudi dostopnost sanitarij za invalide. Celovita dostopnost pa bi poleg vsega že navedenega vključevala tudi parkirišča, namerjena invalidom.

V okviru obravnave zgoraj omenjene Varuhove samoiniciativno začete zadeve so bile na vseh 66 sodišč v Republiki Sloveniji naslovljene poizvedbe (prvi odstavek 38. člena Poslovnika Varuha človekovih pravic) o letnici izgradnje in morebitne rekonstrukcije objekta, v katerem posluje sodišče, ali so prostori sodišča fizično dostopni za invalide, ali so prostori sodišča opremljeni s sanitarijami, dostopnimi za invalide; ali sodišče zagotavlja parkirišča za invalide ali pa je ob vhodu v objekt zagotovljena vsaj možnost za kratkotrajno ustavitve vozila osebe z invalidskim vozčkom; ali sodišče v vabilih vabljene seznanja s pravico do enakopravnega sodelovanja v postopku ter koliko vabljene osebe je v letih od 2015 do vključno 2017 sporočilo sodišču, da so invalidi z gibalno ovrnanostjo in težavami pri premagovanju fizičnih/arhitektonskih ovir (npr. stopnice) in kako se je sodišče odzvalo na morebitna tovrstna sporočila. Za primer, da prostori sodišča, posebej tudi sanitarije, niso fizično dostopni za invalide, oziroma sodišče ne zagotavlja možnosti za parkiranje invalidov, pa smo zaprosili še za pojasnila o tem, ali v vabilih vabljene seznanjajo z informacijo, da nimajo urejenega dostopa za invalide (vstop/dostop v objekt, gibanje po objektu, sanitarije, parkiranje); na kakšen način osebam, ki zaradi gibalne ovrnanosti ne



4. Varuh priporoča Državnemu zboru postopanje, v okviru katerega se bo čim prej (tudi) s sprejetjem ustreznih zakonske podlage v zvezi s pravicami študentov invalidov glede prevoza med krajem bivaliča in krajem izobraževanja, zadostilo dolžnosti iz tretjega odstavka 38. člena Zakona o izenačevanju možnosti invalidov (ZIMI) po primerni prilagoditvi študijskega procesa za študente invalide.



55. Varuh priporoča, naj (po zgledu dobre prakse Ministrstva za pravosodje, ki je začelo pripravljati analizo dostopnosti sodišč že v letu 2017) Ministrstvo za izobraževanje, znanost in šport nemudoma začne z analizo dostopnosti srednjih in osnovnih šol za invalide ter na tej podlagi izdela uresničljiv načrt za zagotovitev dostopnosti teh objektov, v katerem bosta predvidena tudi časovni in finančni načrt izvedbe ukrepov.

56. Ob upoštevanju dolgotrajnosti reševanja dostopnosti Gimnazije Bežigrad in dejstva, da v širši slovenski osrednji in zahodni regiji nobena gimnazija, ki izvaja program mednarodne mature, ni fizično dostopna za invalide, Varuh priporoča MIZŠ, naj v proračunu nemudoma zagotovi sredstva za izvedbo odprave grajenih ovir na Gimnaziji Bežigrad.



### Dostop javnih zgradb za invalide

Varuh človekovih pravic RS (Varuh) je pri svojem delovanju ves čas pozoren tudi na dostop do javnih zgradb za invalide. Tako smo na zunanjem poslovanju v Ljutomeru opazili, da zgradba Občine Ljutomer, kjer ima svoje prostore tudi Upravna enota Ljutomer, ni prilagojena dostopu oseb na invalidskih vozčkih.

Na svojo pobudo smo občino in upravno enoto opozorili na določbe Konvencije o pravicah invalidov (MKPI), katere podpisnica je tudi Republika Slovenija. Poudarili smo, da je odprava arhitektonskih ovir še posebej pomembna v primerih, ko so v stavbah prostori državnih organov ali organov lokalne samouprave. MKPI določa, da odklonitev primere prilagoditve, torej tudi odklonitev odprave arhitektonskih ovir, pomeni obliko diskriminacije zaradi invalidnosti. Če je osebam na invalidskih vozčkih preprečen dostop do javnih zgradb, jim je s tem onemogočeno tudi uveljavljanje njihovih pravic in interesov. Prilagoditev dostopa za invalide je pomembna tudi z vidika zaposlovanja invalidov. MKPI v 27. členu namreč določa, da morajo države pogodbenice invalidom – enako kot drugim – zagotoviti pravico do dela. Ta obveza med drugim pomeni, da mora biti delovno okolje dostopno invalidom. Manj ugodno obravnavo v zvezi z uveljavljanjem posameznikovih pravic, ker zaradi invalidnosti ne more dostopati do javnih zgradb, prepoveduje tudi Ustava Republike Slovenije, ki v 14. členu določa, da so vsikomur zagotovljene enake človekove pravice, ne glede na invalidnost. Do uveljavitve ZIMI je diskriminacija na podlagi invalidnosti prepovedana na podlagi Zakona o uresničevanju enakih možnosti.

Iz odgovorov upravne enote in občine je bilo mogoče razbrati, da se pristojni zavedajo pomena dostopnosti javne zgradbe za invalide. Že v letu 2002 so se ob rekonstrukciji stopnišča zavzemali za vgradnjo dvigala, vendar je projektant ugotovil, da ta ni mogoča, izvedba dvigala ob fasadi pa bi bila povezana z visokimi stroški in večjo rekonstrukcijo stavbe, ki je zaščiten kot objekt kulturne dediščine.

Kot začasna rešitev sta od leta 2004 nameščena zvonec in domofon, da lahko oseba na vozčku pokliče pristojnega uslužbenca in želeno storitev opravi v avli. Občina in upravna enota se zavedata, da takšna rešitev ni ustrezna in ne more ostati trajna, zato sta pristopili h gradnji prizoka k stavbi, ki bo etajno povezan s stavbo, v njem pa bo tudi dvigalo. Gradnja naj bi se začela v letu 2011.



Letno poročilo  
Varuha človekovih pravic  
Republike Slovenije  
za leto 2010





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SPECIAL REPORT

# **ACCESSIBILITY OF CENTRES FOR SOCIAL WORK FOR PEOPLE WITH MOVEMENT AND SENSORY IMPAIRMENTS**

Ljubljana, December 2022

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***“I find that in Slovenia, discrimination of the disabled is becoming increasingly evident in numerous fields.”***

the Human Rights Ombudsman Peter Svetina in the Annual Report of the Slovenian Human Rights Ombudsman for 2019 (p. 16),  
the first in his mandate

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# THE MAIN POINT

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In the Republic of Slovenia, no earlier than in 2021:

“I don't know **if you've ever visited their offices?** I can tell you that they **are high up on the third floor, with lots of stairs and without a lift.**”

“... their **offices are inappropriate for us** who, due to different health issues, **find it difficult to climb stairs.**”

“... **it is very hard to get to them.** I can't even imagine, **how people in wheelchairs get to them up there.**”

“I can't complain about the employees. ... They have **always treated me fairly and kindly**, sometimes they **even came to the first entrance door so I didn't need to walk up** the stairs.”

“The employees always say that **they agree with me** and that they have **informed their bosses about it.**”

“I don't know **who chose these offices...** It is **an embarrassment that an institution such as a centre for social work is not accessible for people who need it.**”

From one of the (anonymous) complaints to the Ombudsman from a user of the offices of one of the centres for social work

The statements on the left are probably telling enough. Does anything need to be added? Considering that when we received them it was 2021, and they later proved to be right, we believe that something absolutely needs to be added! Otherwise, this would be just another example of a very basic warning about the hardly negligible flaws in the country that has disappeared into oblivion. Hence, the Human Rights Ombudsman of the Republic of Slovenia decided to add to the quoted statements this special report. Taking into account the possibilities provided to the Ombudsman by the existing legislation, we want to try and do everything in our power to present them and our findings in relation to other such locations to reveal the

• **urgency for the engagement of all stakeholders which will as soon as possiblej (finally) result in as many as possible of the still needed actual improvements of accessibility of facilities or offices of centres for social work as public social care institutions, so that they can (be)come as close as possible to meeting the psychophysical and health needs of all users, especially those with impairments.**

The necessity of changes for the (even) better is the unavoidable result of the intertwinement of two key facts:

first, the now established basically universal recognition of people with disabilities as a **distinctly vulnerable social group** stems not only from the existing national and international normative framework, but also from the current practice of the relevant authorities in the field of human rights and fundamental freedoms protection – hence, is it justifiably expected that the persons responsible act with **due attention**;

second, centres for social work **are institutions that are public**, and services or activities are carried out within them the **social care nature** of which can significantly, or even decisively, influence the **dignity of life of users** – and therefore, if they are to be truly social and legal, **obligations of the state are also distinctly accentuated** here.



*“The court has recognised **several such vulnerable groups** subjected to different treatment due to their characteristics or status, **including their impairments...**”*

European Court of Human Rights (judgement in the case Guberina versus Croatia (23682/13), §73)



“A social care institution or another legal person **can start operating** if, **in addition to general conditions** for the establishment of the institution or other legal person, **minimum technical, staff, and other conditions** prescribed by the minister competent for social care are also met.

*The eligibility from the previous paragraph is determined by the ministry competent for social care.”*

Article 60 of the Social Assistance Act (Official Gazette of the Republic of Slovenia, nos. 3/07 – official consolidated version, 23/07 – corr., 41/07 – corr., 61/10 – ZSVarPre, 62/10 – ZUPJS, 57/12, 39/16, 52/16 – ZPPreb-1, 15/17 – DZ, 29/17, 54/17, 21/18 – ZNOrg, 31/18 – ZOA-A, 28/19, 189/20 – ZFRO in 196/21 – ZDOsk)

“The reality concerning facilities in which centres for social work and their units operate is that **these buildings are not constructed especially for CSWs**. It is important to emphasise here that **the majority of all offices in which CSWs execute their services are rented**.”

Ministry of Labour, Family, Social Affairs and Equal Opportunities (letter no. 070-71/2021/2 of 17.9.2021)

“The search for suitable offices **on the open real-estate market is thus no longer necessary**. But it will be if the potential landlord does not receive an answer about the readiness to enter into a lease agreement. Namely, **they have been waiting for a reply for several months, which we cannot provide until we receive the consensus** of the line ministry. The offices in which the employees of the Sežana unit now perform their duties **are owned by the state**.”

Center for social work Južna Primorska (letter no. 070-6/2022-31933 of 22.11.2022)

“The building or the business premises of the then CSW Jesenice **did not meet the then existing regulations regarding the unobstructed access, entrance, and use of offices for functionally impaired persons even upon the acquisition of the operating permit, yet the inspectors at the technical inspection tolerated that**, since the building permit for a lift had been acquired, an AB ditch was already made, and it was stated that the lift would be completed in Phase 2 of the building alterations.”

CSW Gorenjska, Jesenice unit (letter no. 060-1/2021-31887 of 10.3.2021)

Since October 2018, **16 regional centres for social work or a total of 63 of their units (some operate in several different buildings) operate** in the Republic of Slovenia. Considering such locational diversity, it can be expected that user experience connected with accessibility will be very diverse. Therefore, the first challenge is to create a sufficiently approximate outline of the real situation, which should then be viewed from the consideration that **enabling physical access to public buildings and facilities, access to information, communication, and other services intended for the public is an important element of ensuring equal opportunities of disabled people, including for people with movement or sensory impairments.**



“Contracting states also adopt suitable measures with which they:

- a) **develop, expand, and monitor** the implementation of **minimum standards and guidelines for the accessibility** of buildings, instruments, and services intended for the public or are performed for it;”

...from Article 9 of the Convention on the Rights of Persons with Disabilities

In March 2021, the Ombudsman started<sup>1</sup> inquiring **about the selected aspects of accessibility for people with movement impairments** of each and every one of the mentioned public buildings and facilities (both the building and offices within it, including whether they are equipped with toilets accessible for the disabled and whether they have parking spaces reserved for people with disabilities or at least a possibility for the vehicle of a wheelchair user to stop in front of the entrance for a short time. We separately inquired about how many people between 2018 and 2020 informed them that they have a disability which causes them to face difficulties in overcoming physical obstacles (e.g. stairs), and how they reacted to that. Later, in January 2022, we turned to the same addressees asking **about the selected aspects of accessibility for people with sensory impairments** (including questions about the work with users with sight and hearing impairments, accessibility of the entrance, the lift, the hallway or waiting room, the unit equipment, and signs and information, as well as e-accessibility). Further on, a special chapter is devoted to the first and the latter aspect for a detailed introduction.

*“Accessibility standards must be wide and **standardised.**”*

United Nations Committee on the Rights of Persons with Disabilities in General Comment no. 2, Point 25 (2014)



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<sup>1</sup> Additional inquiries were subsequently made with some of them for the purpose of clarification (in some cases requests had to be sent). Actual dates of received replies, based on which we draw the picture of the situation from the standpoint of movement impairments in this report, are listed in **Table 1 of the appendix**; the same goes for **Table 2**, which is also found in the appendix and pertains to the aspect of sensory impairments.

We would like to strongly emphasise that it **was not our ambition to research in detail and serve the reader the checked and most recent situation in every location.** This publication would not have been a good choice for reaching such goals. Namely, the considered circumstances change, which means that gathering and analysing information about them and preparation of the text demands time. Thus, the determined state is founded (only) on reported information from the management of individual centres for social work in the responses to the Ombudsman's queries. The situation was also not checked indirectly in the field. Such a research approach was not chosen as an emergency exit or without an appreciation of its limitations on our part. It was selected because, on the other hand, it brings along an important additional indicator: since it was up to the management to (self)define the set accessibility criteria, it is ultimately also possible to discern how differently they could be understood. It is also a **different understanding of the accessibility circumstances<sup>2</sup> that can be a telling finding that calls, for example, for a clear(er) definition of relevant concepts in the field regulations and also general unification of field standards, and furthermore possibly also for more intensive awareness raising among employees about them, etc.**

Above all, the following should be kept in mind::

- **It is principally up to the authorities (and not the Ombudsman!) to always search in a sufficiently attentive and timely manner and then persistently ensure and check the level on which rights can be realised and services (including the social care ones) or activities for individuals guaranteed in accordance with the declared standard of respecting human dignity in modern society.**

**For well over a decade now the Slovenian legislation<sup>3</sup> has unequivocally determined that the promotion and creation of equal opportunities for disabled people and the prevention**

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2 The Brežice unit (as well as the Krško unit) of CSW Posavje, for example, marked the option PARTLY for the question of "Is the lift accessible for use by persons with hearing or visual impairments? (well-marked, illuminated, equipped with acoustic and tactile features)", and also added that it is "marked, illuminated", from which can be derived that it is not equipped with acoustic and tactile features (similarly, for example, the Tržič unit of CSW Gorenjska also stated that it is "illuminated, marked, but without acoustic and tactile features"). The same state (with the note "The lift is well-marked and illuminated. The lift is not equipped with acoustic or tactile features.") was differently described by, for example, the Pesnica unit of CSW Maribor, i.e. with a NO; another unit of the same centre, the Lenart unit, described the same state with PARTLY). Therefore, even different units of the same centre described the completely identical actual state of the lift accessibility differently.

3 Cf. Articles 26, 27, and 29 of the Equalisation of Opportunities for Persons with Disabilities Act valid from 11.12.2010 (Official Gazette of the Republic of Slovenia, nos. 94/10, 50/14, and 32/17).

of discrimination of the disabled are duties of the Government of the Republic of Slovenia and its ministries, which, in their own respective fields, realise the goals of the national action programme for the disabled, the proposal of which is prepared every five years by the ministry competent for disability care, and is adopted on the governmental level to which the mentioned ministry is supposed to report annually about its implementation; the same ministry competent for disability care should also confirm the annual programme of work of the University Rehabilitation Institute of the Republic of Slovenia – Soča, the Social Protection Institute of the Republic of Slovenia, and the Urban Planning Institute of the Republic of Slovenia, on which the duty of carrying out of development tasks is imposed.

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*“The Equalisation of Opportunities for Persons with Disabilities Act stipulates that all public buildings and facilities must be accessible for people with movement and sensory impairments by the end of 2025. Three years before the deadline there is **no data about how many public buildings and facilities are still inaccessible for the disabled. There is also no estimate**, since we have not received any such order from any of the ministries.”*

RTV SLO about the data regarding the inaccessibility of public buildings and facilities and clarifications pertaining to this issue from the Urban Planning Institute of the Republic of Slovenia (in Čez tri leta morajo biti vse stavbe v javni rabi dostopne invalidom, <https://www.rtv slo.si/dostopno/cez-tri-leta-morajo-biti-vse-stavbe-v-javni-rabi-dostopne-invalidom/646342> (7.11.2022))

*“Tasks from Paragraphs 1 and 2 of this Article are carried out by institutes based on the annual work programme confirmed by the **ministry** competent for disability care.”*

.from Paragraph 3 of Article 29 of the Equalisation of Opportunities for Persons with Disabilities Act (Official Gazette of the Republic of Slovenia, nos. 94/10, 50/14, and 32/17)

”



***“The promotion and creation of equal opportunities for people with disabilities and the prevention of discrimination against people with disabilities are the tasks of the **Government of the Republic of Slovenia and its ministries**, which each in its own respective field realises goals of the national action programme for people with disabilities...”***

...from Paragraph 1 of Article 26 of the Equalisation of Opportunities for Persons with Disabilities Act (Official Gazette of the Republic of Slovenia, nos. 94/10, 50/14, and 32/17)

*“...would like to clarify that the **operator of the ZIMI is indeed the MDDSZ**, but that the realisation of this horizontal act, as well as the control of its individual parts, **is the responsibility of the line ministries to which the field of this act pertains**. These ministries have exclusively their own supervisory bodies for determining violations of the field in question.”*

Ministry of Labour, Family, Social Affairs, and Equal Opportunities  
(letter no. 070-43/2021/7 of 13.12.2021)

***“The Government of the Republic of Slovenia appoints centres for social work, their seats, and territorial jurisdiction, as well as units of the centres for social work and their areas of operation with a decree, **which ensures rational and efficient task performance.**”***

Paragraph 6 of Article 49a of the Social Assistance Act (Official Gazette of the Republic of Slovenia, nos. 3/07 – official consolidated version, 23/07 – corr., 41/07 – corr., 61/10 – ZSVarPre, 62/10 – ZUPJS, 57/12, 39/16, 52/16 – ZPPreb-1, 15/17 – DZ, 29/17, 54/17, 21/18 – ZNOrg, 31/18 – ZOA-A, 28/19, 189/20 – ZFRO, and 196/21 – ZDOsk)  
(Official Gazette of the Republic of Slovenia, no. 3/07)

***“The founder of the social care institution **must ensure means for major maintenance and repairs and other duties stipulated by the law and deed of establishment.**”***

Paragraph 1 of Article 61 of the official Social Assistance Act  
(Official Gazette of the Republic of Slovenia, nos. 3/07 – official consolidated version, 23/07 – corr., 41/07 – corr., 61/10 – ZSVarPre, 62/10 – ZUPJS, 57/12, 39/16, 52/16 – ZPPreb-1, 15/17 – DZ, 29/17, 54/17, 21/18 – ZNOrg, 31/18 – ZOA-A, 28/19, 189/20 – ZFRO, and 196/21 – ZDOsk)

***“The founder of the centre is the Republic of Slovenia, **its founding rights and obligations are executed by the Government of the Republic of Slovenia.**”***

Paragraph 1 of Article 2 of the Decision on the establishment of the Centre for Social Work Ljubljana (Official Gazette of the Republic of Slovenia, no. 30/18), stated as an example

**“Every three years, the Government of the Republic of Slovenia reports to the National Assembly** about the effectiveness of the operation of centres for social work and their units in the areas where they are founded.”

Paragraph 7 of Article 49a of the Social Assistance Act (Official Gazette of the Republic of Slovenia, nos. 3/07 – official consolidated version, 23/07 – corr., 41/07 – corr., 61/10 – ZSVarPre, 62/10 – ZUPJS, 57/12, 39/16, 52/16 – ZPPreb-1, 15/17 – DZ, 29/17, 54/17, 21/18 – ZNOrg, 31/18 – ZOA-A, 28/19, 189/20 – ZFRO, and 196/21 – ZDOsk)

**“The ministry competent for disability care reports annually to the Government of the Republic of Slovenia** about the implementation of the action programme.”

...from Paragraph 4 of Article 27 of the Equalisation of Opportunities for Persons with Disabilities Act (Official Gazette of the Republic of Slovenia, nos. 94/10, 50/14, and 32/17)

**“Based on the proposals of ministries, the Disability Council of the Government of the Republic of Slovenia, the National Council of Disability Organisations, all representative and other disability organisations operating on the national level, local communities, social partners, expert associations, and the widest public the ministry, responsible for the protection of people with disabilities prepares an action programme proposal every five years.”**

Paragraph 1 of Article 27 of the Equalisation of Opportunities for Persons with Disabilities Act (Official Gazette of the Republic of Slovenia, nos. 94/10, 50/14, and 32/17)

**“The action programme is adopted by the Government** of the Republic of Slovenia.”

Paragraph 3 of Article 27 of the Equalisation of Opportunities for Persons with Disabilities Act (Official Gazette of the Republic of Slovenia, nos. 94/10, 50/14, and 32/17)

**“Analytical, expert, information, programme tasks** and developmental work as well as other tasks for the equalisation of opportunities for people with disabilities are carried out by the Social Protection Institute of the Republic of Slovenia.”

... from Paragraph 1 of Article 29 of the Equalisation of Opportunities for Persons with Disabilities Act (Official Gazette of the Republic of Slovenia, nos. 94/10, 50/14, and 32/17)

**“Analytical, expert, and information tasks** regarding the use and adjustment of public facilities and structures and accessibility of goods and services available to the public, are carried out by the Urban Planning Institute of the Republic of Slovenia.”

... from Paragraph 2 of Article 29 of the Equalisation of Opportunities for Persons with Disabilities Act (Official Gazette of the Republic of Slovenia, nos. 94/10, 50/14, and 32/17)



If all this time the legally mandated promotion and creation of equal opportunities for people with disabilities and the prevention of discrimination against people with disabilities, the realisation of goals, reporting, and analysis were to be carried out conscientiously, the question arises as to how the Ombudsman could in 2021 identify with a relatively simple inquiry so many shortcomings. We assume that only one answer is possible: that **the people responsible have until now not performed their job well enough**. This general finding is given as a comment on the system as such. Undoubtedly, **our experience and findings** are sufficient for this, even if they are not the result of methodological perfection. Furthermore, we are general in this finding also due to the fact that **with time, not only individuals within the system changed** and hence it would not make sense to point at some of them now, but **the system itself was also subject to handling by different political options or their combinations**, which all in their own way contributed to the result as it is now. **Looking into the future**, we must now, looking instead towards the current decision makers on all levels, **expect better**.

Thus, with this report the Ombudsman wants to be **primarily illustrative – and not comprehensive in all aspects**. Since we do offer concrete enough examples, we believe that **we offer the state, which is obliged to ensure the improvements, enough for immediate action**.

We would like to especially stress that **it is not our intention to put anybody in the pillory** by exposing specific answers of individual units. The described manner is only employed to present as directly as possible the selected aspects of reality and thus remain loyal to authenticity while still preserving transparency.

The stakeholders responsible for the existing state at the centres for social work or their units (whether good or bad) should definitely include their directors. It has been confirmed that

- **sometimes for important changes to take place at a centre for social work or its unit, it is enough if its director gets slightly involved – and the reasons for the unacceptable state are not the consequence of the conduct of others in the system.**



*“The unit’s business premises have toilets accessible for the disabled. But the appropriate equipment for a person with disability is lacking, to which we brought the attention of the facility’s owner. This shortcoming **will be eliminated within a month.**”*

Gornja Radgona unit of CSW Pomurje (letter no. 070-2/2021-31895/2 of 17.3.2021)

Thus, in one of the units, for example, toilets generally accessible for people with disabilities did not have equipment adapted to them, while the director of the centre for social work **responded to the Ombudsman's first inquiry with an assurance that this shortcoming would be eliminated** – the subsequent inquiry confirmed that it was indeed so. Similarly, for example, from another centre for social work we first received the explanation that premises of one of the units do not have toilets for people with disabilities accompanied by an **assurance that the initiative for the implementation of such toilets would be, based on our letter, forwarded** to the owners of the building; later, the situation was indeed supposed to have been rectified.

“

*“...we immediately started eliminating the shortcomings and **called the owner** of the facilities who immediately provided the toilets for the disabled with the appropriate equipment, meaning that suitable holds were installed.”*

CSW Pomurje (letter no. 909-237/2022-31895/2 of 14.11.2022)

*“**None of the locations currently has toilets for the disabled.** The investment depends on the owners of the facility. **Based on your letter,** the proposal for the installation of suitable toilets will be forwarded to the owners of the facility.”*

Zagorje ob Savi unit of CSW Zasavje (letter no. 070-1/2021-31844/4 of 22.3.2021)

”



“Buildings and facilities in which social care services and CSW activities are performed must be **accessible and designed in a manner that suits the psychophysical and health needs of users and the implementation of expert work of employees.** Facilities must be near a post office, a bank, a health care centre, and other facilities with a similar purpose.”

Paragraph 1 of Article 8 of the Rules on minimum technical requirements for social assistance services providers (Official Gazette of the Republic of Slovenia, nos. 67/06 and 135/21)

“**The fulfilment of the minimum technical conditions is established by the ministry** z responsible for social welfare. In every process of acquiring business premises (additional, new, replacement premises), the CSW submits an application to the ministry which decides with consent. **Without the issued consent of the ministry, a CSW cannot acquire business premises.**”

Ministry of Labour, Family, Social Affairs and Equal Opportunities (letter no. 070-71/2021/2 of 17.9.2021)

“Access from the street is enabled to the office, **in the period since our previous letter** the landlord arranged for the appropriate concrete access to the office that enables uninterrupted treatment of people with disabilities.”

Slovenj Gradec unit of the CSW Koroška (letter no. 350-1/2021-31917/6 of 9.4.2021)

“As the director of the CSW **I am aware of the fact that suitable access for people with disabilities needs to be arranged appropriately** z so they can access premises of the Centre for Social Work. **I pledge** that I will make contact with the Municipality of Ribnica to upgrade the existing premises or find replacement premises for the Ribnica unit.”

Ribnica unit of CSW Osrednja Slovenija – Zahod (letter no. 021-33/2021-31925/2 of 25.3.2021)

“The premises of the Ribnica unit **are not physically accessible for people with movement impairments and do not provide toilets for people with movement impairments.** /.../ During the reorganisation of the CSW we discussed this with the landlord in order to start searching for a solution for how to make the premises accessible for people with disabilities, but we were unsuccessful.”

Ribnica unit of CSW Osrednja Slovenija – Zahod (letter no. 021-33/2021-31925/2 of 25.3.2021)





“The building or business premises of the then CSW Jesenice **did not meet the then valid regulations regarding the unhindered access, entrance, and use of premises for functionally impaired people even upon the acquisition of the operating permit, but the inspectors tolerated this at the technical inspection**, since the building permit had been acquired for a lift, an AB ditch was made, and it was stated that the lift would be finished in Phase 2 of the building’s renovation.”

Jesenice unit of CSW Gorenjska (letter no. 060-1/2021-31887 of 10.3.2021)

“From 2018 to 2020, the CSW **did not receive any such messages**, but the centre did inform the landlord (Municipality of Slovenj Gradec) that the business premises do not meet the requirements of the Rules on minimum technical requirements for social assistance services providers and **invited the landlord to immediately start** adapting the building in February 2020. On 9.3.2021 **the landlord actually started repairing the ramp** for the access of people with disabilities on the ground floor of the building.”

Slovenj Gradec unit of CSW Koroška (letter no. 350-1/2021-31917/2 of 10.3.2021)

“The premises of our unit **are not accessible for people with disabilities.**”

Jesenice unit of CSW Jesenice (letter no. 060-1/2021-31887 of 10.3.2021)

“Currently, the premises of the Idrija unit are located in the attic of a fire station... The premises are owned by the Republic of Slovenia and partly by the municipalities of Idrija and Cerklje ob Gori. ... **Currently, the building is inaccessible for the majority of people with impairments.** People with movement impairments **do not even have access to the ground floor.** Employees solve this problem by holding meetings and talks involving wheelchair users in front of the building or in a vehicle.”

Idrija unit of CSW Severna Primorska (letter no. 070-2/2021-31968/2) of 10.3.2021)





*“Users have been communicating difficulties with accessing business premises **since the beginning of operation** at this location. All older users, not only people with disabilities **have a lot of difficulty climbing the stairs to the second floor, as well as accessing the toilets and the building itself.**”*

Sežana unit of CSW Južna Primorska (letter no. 909-11/2021-31933 of 23.3.2021)

The Ombudsman also received a similar, **at first glance commendable, yet upon serious deliberation much more worrying** response to its findings about the physical (in)accessibility of Slovenian centres for social work from the Ministry of Labour, Family, Social Affairs and Equal Opportunities. After familiarising themselves with the findings, the Ministry informed us that **it is evident from the Ombudsman’s letter** that four units do not have physical accessibility enabled properly and that thus they have first turned directly to directors of the responsible centres for social work asking them about the solutions to this issue. In connection to this, in addition to the question of how it is that

- **the ministry itself after all these years of multilateral collaboration, confirmation of work programmes, and last but not least, annual reports to the government, does not have at its disposal such basic current data as the physical (in)accessibility for people with disabilities according to individual units of centres for social work,**

especially surprises, as well as

- **how the Ministry then even determines the fulfilment of the requirements for the establishment of an institution, primarily of minimum technical, staff, and other requirements, stipulated by their minister, or how consents could even have been given in the procedures of business premises acquisition**

and individual centres for social work could even start operating

As we have found, the situation with accessibility at the Slovenian centres for social work is not optimal; moreover, **it was downright critical in some cases.** Namely, in **2021**, four units of **centres for social work did not have even physical accessibility of their premises enabled for people with movement impairments.** Years and years of fruitless search for other solutions (if we are to believe that all this time solutions were indeed being sought with all

due diligence) should lead to the adoption and also the realisation of the decision about the move to a new location much sooner, since the current one simply cannot be acceptable. At least not if **we are genuinely striving for the recognition of dignity for every man, ensuring equal human rights and fundamental freedoms regardless of the disability, creation of equal opportunities for people with disabilities in all areas of life, and everything else which is generally so nobly written in various ratified conventions, the constitution, and valid legislation.**



*“The premises are not equipped with toilets for people with disabilities. **(Toilets for people with disabilities can be used in the Zagorje ob Savi health care centre, which is located 170 metres away from the premises of the Zagorje ob Savi unit.)”***

Zagorje ob Savi unit of CSW Zasavje (letter no. 070-1/2021-31844/4 of 22.3.2021)

*“...the unit is physically accessible to people with disabilities, **while there are no toilets for people with disabilities, but the latter are provided in the immediate vicinity of the premises (Petrol)...”***

Metlika unit of CSW Dolenjska and Bela Krajina (letter no. 099-1/2021-31909/2 of 11.3.2021)

*“...the unit is physically accessible to people with disabilities, there are no toilets for people with disabilities, but the latter are provided **in the immediate vicinity of the premises (healthcare centre)...”***

Trebnje unit of CSW Dolenjska and Bela Krajina (letter no. 099-1/2021-31909/2 of 11.3.2021)

We can comment similarly on, for example, the finding that **in the same period 18 centre for social work units were not equipped with toilets accessible to people with disabilities.** Among these, those units have also been assigned which stated certain other possibilities, such as **toilets located at a nearby petrol station**, in a **healthcare centre** in the immediate vicinity, or in a healthcare centre which is only 170 metres away from a particular unit, etc. Interestingly, this is also the distance between the premises where the Ombudsman's headquarters are situated and the nearest healthcare centre. It is not difficult to imagine how inappropriate it would be if we expected from our employees without movement impairments to head there every time they needed to use a toilet. This comparison was chosen intentionally since it indicates that when dealing with the disabled “everything is acceptable” and points to **indifference exactly where there should have been less tolerance.**

*“When defining accessibility standards for people with disabilities, contracting states must **consider the diversity of people with disability** and ensure that accessibility is also provided for people of **all sexes and ages as well as types of disability.**”*

United Nations Committee on the Rights of Persons with Disabilities in General Comment no. 2, Point 29 (2014)





*“... accessibility is **in practice comprehended fairly narrowly – only as a non-existence of physical barriers** for those who use a wheelchair...”*

European Economic and Social Committee in a report entitled Real rights of people with disabilities to vote in European Parliament elections, section 6.2.3 (2019)

Apparently, centres for social work also too frequently perceive the significance of accessibility **only from the perspective of movement impairments**. It was found that **the situation is only worse if looked at from the perspective of their accessibility for people with sensory impairments**: only half of the units of centres for social work, for example, had a clearly marked entrance which enables unhindered access for people with hearing or sight impairments; only 26 per cent from the total of 43 units of centres for social work that had a lift also had the kind accessible for use (i.e. well-marked, illuminated, equipped with acoustic and tactile features) for people with hearing or sight impairments; only a minority (44 per cent) of the units of centres for social work had access to the entrance of the unit premises clearly marked and offering unhindered access to people with sensory impairments, etc. Above all, it should be remembered that, for example, **the installation of a lift alone does not take care of all accessibility responsibilities** – a newly installed lift can only partly ensure greater accessibility if it is not also appropriately sensorily equipped. Furthermore, the acquired data reveal that **the great majority of all units actually also do work with users with hearing (87 per cent) and sight impairments (84 per cent)**.

*“**The duty of implementing accessibility is unconditional, i.e. the entity bound to ensure accessibility cannot justify wavering by referencing the burden of access for people with disabilities.**”*

United Nations Committee on the Rights of Persons with Disabilities in General Comment no. 2, Point 25 (2014)

*“...undoubtedly there are also **reasonable, even simple manners of lasting elimination of a discriminatory barrier** (e.g. installation of a permanent or temporary ramp, appropriate mobile elevated platform, etc.).”*

... from the Human Rights Ombudsman Annual Report for 2008 (p. 61)



In short, while studying the available data we face the question of

- **whether the people responsible indeed engage enough in finding or searching for the best possible solution among the realistic choices,**

while the unrealised improvements could indicate primarily to

- **insufficient understanding of the needs of users,**

and possibly also to

- **the ignorance of the commitment of those responsible for regulating the situation and necessary adjustments.**



*“CSW Ljubljana rents the premises in which the Ljubljana Bežigrad unit operates. The provision of a parking space or toilets for people with disabilities is **under the responsibility of the building owner and building manager.**”*

Ljubljana Bežigrad unit of CSW Ljubljana (letter no. 020-108/2021-31984/2 of 22.3.2021)

*“The MS unit moved to the new premises /.../ in September 2018. Upon taking over the premises, the building was equipped with a lift and toilets adapted and accessible for people with disabilities. **We immediately summoned the building owner** to adjust the building entrance in a manner that would enable access for people with disabilities. A movable ramp that enables such access was installed in November 2018.”*

Murska Sobota unit of CSW Pomurje (letter no. 070-2/2021-31895/2 of 17.3.2021)

In the light of final unfavourable circumstances for a user with any kind of disability it is not very important whether this is a consequence of **indifference or even intentional condescension**. Nevertheless, we should mention that, unfortunately, one of the responses of centres for social work regarding accessibility for people with sensory impairments did not reflect even a decent attitude towards the Ombudsman as a state body. Hence **the degree of sensitivity towards users with sensory impairments that can be displayed by a public official in a centre for social work** which exhibits a condescending attitude even towards the institution of the Ombudsman is highly questionable:

**Ombudsman:** *“Is the entrance to the unit clearly marked and does it offer unhindered access for people with hearing and visual impairments?”*

**Kamnik unit of CSW Osrednja Slovenija - vzhod:** *“There is a sign on the front, but how does a blind person see it? I think they don't see it*

**Varuh:** *“Is the entrance to the unit clearly marked and does it offer unhindered access for people with sensory impairments?”*

**Unit Kamnik CSW Osrednja Slovenija - vzhod:** *“There is a sign with an inscription, does a blind person see it? I think not”*

In a few cases, the management of the social work centre **openly acknowledged and reacted self-critically to the reported shortcomings**, but it was often seen that it **mainly wanted to relativise the accessibility shortcomings** of its units by showing more or less convincing alternatives or **adaptation practices and other specifics in dealing** with users. We do not want to flatly reject such efforts in the direction of finding solutions in the existing unenviable conditions of their work with users. However, such behaviour obscures a significantly more worrying reality – users receive **services or activities in one or another non-purpose space** (such as corridors, lobbies, etc.), and they are subjected to additional dependence on the help of others, which also **reduces the independence of their lives**, etc. Therefore, **if one uncritically agrees to such partial adaptation approaches as an eternally acceptable response to accessibility shortcomings, there will be no progress in terms of more holistic solutions.**

Very common among the responses of social work centres was that, despite acknowledged shortcomings, they **have not noticed or received complaints** from users in this regard. Connected to this, it is appropriate to retort that **the absence of complaints about something is by no means a definitive indicator of the adequacy of the situation.** In other words, in the words with which the Office of the High Commissioner for Human Rights at the United Nations responds to one of the frequently asked questions regarding the Convention on the Rights of Persons with Disabilities<sup>4</sup>: “A low number of complaints does not necessarily reflect respect of rights, just as a higher number does not necessarily reflect a higher frequency of rights violations.” The lower number of complaints may also be due to the fact that “complaint mechanisms are not accessible, or that they neither work nor are reliable, or that people with disabilities are not aware of their rights, or all of this together”. Thus, for example, even recently, in March 2022, one of the experts of the Committee for the Rights of Persons with Disabilities pointed out in a dialogue with the Swiss authorities that “many persons with disabilities are still not aware of their rights”, despite the adopted measures to raise awareness about them in the country.



*“...As the effective enjoyment of many of the Convention rights by people with disabilities may require **the adoption of various positive measures** by the relevant state authorities...”*

... from a verdict by the European Court of Human Rights in the matter of Arnar Helgi Lárusson versus Island (23077/19), §56

<sup>4</sup> Cf. ps. 6–7 of the Frequently Asked Questions on the human rights indicators on the Convention on the Rights of Persons with Disabilities (CRPD) publication, © 2020 United Nations.

<sup>5</sup> Cf. In Dialogue with Switzerland, Experts of the Committee on the Rights of Persons with Disabilities Commend COVID-19 Protections and Ask About Rise in Institutionalisation (March 2022): <https://www.ohchr.org/en/news/2022/03/dialogue-switzerland-experts-committee-rights-persons-disabilities-commend-covid-19>.



“Since the improvement of accessibility in the built environment **may take time** /.../ it is essential that **in the meantime the domestic authorities react with the requisite diligence...**”

... from the verdict of the European Court for Human Rights in the matter of Toplak and Mrak versus Slovenia (34591/19 and 42545/19), § 121

“The right to access for persons with disabilities is ensured **through strict implementation of accessibility standard.**”

United Nations Committee on the Rights of Persons with Disabilities in General Comment no. 2, Point 14 (2014)

“In the Ombudsman’s belief, the reception of people with disabilities in a hallway is a violation of Articles 6 and 9 of the ZIMI.”

Annual Report of the Human Rights Ombudsman for 2014 (p. 76)

“At the Jesenice unit **we have noticed problems of users in the past (regardless of the possible presence of bodily or any other impairment)** in entering the premises of the CSW. **For many citizens going into the CSW is connected with stereotypes, stigmatisation, shaming...** regardless of the reason for the need to contact us.”

Jesenice unit of CSW Gorenjska (letter no. 060-1/2022-31887 of 26.4.2022)

“In principle, our customers understand that we are trying to help them to the best of our abilities or as our premises allow. /.../ However, we have received **demands to enter the business premises with the desire to explain that they are equal to all others**, while some users have already announced a visit to the mayor and getting in touch with the media.”

Sežana unit of CSW Južna Primorska (letter no. 909-11/2021-31933 of 26.4.2021)

“We do not record data about how many people have brought attention to the problem of accessibility, **it would be difficult to state credible information;** nevertheless, the issue is current and also unacceptable for us...”

Jesenice unit of CSW Gorenjska (letter no. 060-1/2021-31887 of 10.3.2021)





*“We always suggest to everybody that the next time they need us they should contact us over the phone prior to the visit and that we will find a more appropriate solution for the personal contact (either at their home, at the entrance to the building, **occasionally in the park or the nearest cafeteria**).”*

Sežana unit of CSW Južna Primorska (letter no. 909-11/2021-31933 of 23.3.2021)

*“Privacy of operation/cooperation with the user is in fact impossible to provide in front of the building, since **it is a common entrance to the building used, among others, also as a beauty parlour; privacy is possible only if there is nobody else present on the staircase or in front of the building.**”*

Sežana unit of CSW Južna Primorska (letter no. 909-11/2021-31933 of 26.4.2021)

*“...by the entrance to the building or within it privacy of operation with the users is ensured by **speaking in a low voice, yet audibly and understandably and agreeing with the user that if somebody else walks by we stop talking.**”*

Žalec unit of CSW Savinjsko-Šaleška (letter no. 070-1/2021-31941/2 of 16.4.2021)

*“In 2020, a **hearing in a case of a union break-up was held** at the Krško unit which included a user with a movement impairment and using a wheelchair; interviews were held in an office on the ground floor of the building because the building does not have a lift.”*

Krško unit of CSW Posavje (letter no. 140-1/2021-31852 of 19.3.2021)

*“... toilets for users are located **on the ground floor but are not adapted to persons with disabilities...**”*

*“We estimate that there were around 15–20 people with a movement impairment who stated that they need our help accessing their case managers...”*

Domžale unit of CSW Osrednja Slovenija – Vzhod (letter no. 070-1/2021-31860/2 of 24.3.2021)

*“Not more than 5. We informed them of our actual accessibility and set out the options to come to meet them.”*

Velenje unit of CSW Savinjsko-Šaleška (letter no. 007-45/2021-31941/2 of 25.3.2021)

*“Our users know the space and staff capacities and shortcomings of our unit...”*

Dravograd unit of CSW Koroška (e-mail from 22.4.2022)



- **It is not enough to act as a reaction (after receiving complaints), when ensuring accessibility institutions need to be proactive.**

Last but not least, is it not a shame, as can be seen from the cited statements at the beginning of this report, that **generally commendable user experiences with staff (can) spoil the objective endowments, such as architectural or constructional barriers?**

Thus, some of the improvements were encouraged by the sole engagement of the Ombudsman for the needs of preparing this special report. These are **immensely welcome** from the perspective of **better conditions for new user experiences**, yet **these shifts are also important because they show** that it really did not take much to set the improvements into motion. **It was hence confirmed that those responsible could make this effort even without the prior encouragement from the Ombudsman.** Since it turned out that at least these changes for the better were possible to achieve, and considering the doctrine of positive obligations, we can add without exaggeration that at least such effort **not only could but rather had to be invested without additional encouragement.**

Certainly, with his activities and contacts with decision makers the Ombudsman will strive for **other essential improvements in this field, even though they might be even more intertwined with complex challenges.** Even though some of them probably occurred without our knowledge after the situation presented here, as was established recently, i.e. in 2021 and 2022,

- **every achieved change should primarily encourage further efforts in the direction of the search and achievement of the best accessibility solutions for the especially vulnerable which should never end.**

Even though the situation has improved in places since the Ombudsman's inquiry, we cannot turn a blind eye to the fact that **it was worse – and too bad – for (too) many years!** Such improvements up to at least a minimum of accessibility standards, i.e. enabling physical access into a building (and then within it also to dedicated premises, suitably adapted toilets, etc.), **do not pave some very inventive and never before seen path.** On the contrary, their implementation, even though welcome, inevitably also admits that they have always been possible – **the lack of sufficient contribution was thus on the part of all or at least some of the people involved in the solution.**

- Potential legal and actual barriers on the path of achieving a goal of the highest possible accessibility, especially of a public institution, cannot be a justifiable excuse forever.



*“The fulfilment of the **obligations of ensuring physical accessibility** for people with disabilities to public structures and buildings by legal persons under public law (the state and local communities) **cannot be postponed into the far future**, when it comes to realising one of the fundamental human rights...”*

Constitutional Court of the Republic of Slovenia (in decision no. U-I-156/11-29 Up-861/11-25 of 10.4.2014)

*“We emphasised that eliminating architectonic barriers is **especially important in cases when buildings host premises of state bodies or local self-government bodies**. If wheelchair users do not have access to public buildings, this also **prevents them from enforcing their rights and interests.**”*

Human Rights Ombudsman of the Republic of Slovenia (in the Annual Report for 2010, p. 67)

*“The Court recognised that States might have **a positive obligation to ensure access to public buildings or buildings open to the public** if a lack of access affected a person’s life in such a way as to interfere with his or her right to personal development and right to establish and develop relationships with other human beings and the outside world.”*

European Court of Human Rights in the matter of Arnar Helgi Lárusson versus Iceland (23077/19), §43

The Human Rights Ombudsman Act (ZVarCP)<sup>6</sup> enables the Ombudsman to (including on its own initiative) deal with wider questions important for the protection of human rights and fundamental freedoms and for legal certainty in the Republic of Slovenia (Paragraph 2 in connection with Paragraph 1 of Article 9), and also to report (directly to the National Assembly or its competent working body) on its work, findings on the level of respect for human rights and fundamental freedoms, and with special reports also on legal certainty (Articles 5 and 43); naturally, the Ombudsman can also report its findings and measures to other audiences (Paragraph 2 of Article 8).

This special report presents the actual realisation of all mentioned statutory provisions with which, based on Article 159 of the Constitution of the Republic of Slovenia, the Human Rights Ombudsman of the Republic of Slovenia was founded and its competencies and authorities defined. Physical (in)accessibility of centres for social work as a special type of public institutions in the Republic of Slovenia **for the execution of services, programmes, and other tasks, which due to their social care nature significantly influence the life of many individuals**, was identified as such an important wider question of protecting human rights and fundamental freedoms and legal certainty **of one of the most vulnerable social groups** that we decided on our own initiative (while generally mostly working on received initiatives) to dedicate sufficient available time and human resources to it so that we can now report to the wider public about our work and findings connected to it. Naturally, **we also aim for the most effective response from addressed stake holders**. The latter should, if it is indeed with all due diligence coherent with their mission, **result in actual improvements that will signify something factual. And that in the place where it is the most important – for the end user.**



*“As in recent years, we once again find that **social distress is even greater if we are dealing with single people, older people, and people with disabilities.**”*

Annual Report of the Human Rights Ombudsman of the Republic of Slovenia for 2010 (p. 256)

*“... the problem with the accessibility to the **building, which is intended for the most vulnerable people**, is unacceptable for us and we are aware of the potential additional and unnecessary distress of people if we do not adjust our work to their needs.”*

Jesenice unit of CSW Gorenjska (letter no. 060-1/2021-31887 of 10.5.2021)

*“Since this is **one of the most important buildings for people with disabilities**, it is, in accordance with the Slovenian legislation, urgent to move to a more appropriate location to ensure accessibility of **public premises and services.**”*

Enota Idrija CSD Severna Primorska (dopis številka 070-2/2021-31968/2 z dne 10. 3. 2021)

6 Official Gazette of the Republic of Slovenia, no. 69/17 – official consolidated version.



*“States parties are **not allowed to use austerity measures as an excuse** to avoid ensuring gradual accessibility for persons with disabilities.”*

... from the United Nations Committee on the Rights of Persons with Disabilities General Comment no. 2, Point 25 (2014)

*“Thus, we often had to emphasise that **economic reasons in principle cannot excuse** discrimination, especially when the necessary expenses for adjustments are negligible.”*

.... from the Annual Report of the Human Rights Ombudsman for 2008, p. 55

*“CSW Koroška, Ravne na Koroškem unit, plans to provide toilets for people with disabilities. Since the **centre has limited means for bigger investments**, we will try to compete in the public tender of LAS projects in Mežiška dolina.”*

Ravne na Koroškem unit of CSW Koroška (letter no. 350-1/2021-31917/2 of 10.3.2021)

*“Considering the **poor chances** that access could be arranged in the near future with the construction of a lift, last year we put into motion activities which included searching for **an alternative solution**. We found a solution in the construction of an interior mobile elevated platform and the installation of a ramp on the exterior part. We have collected offers and reserved the means for this purpose. Unhindered access will be provided this year.”*

Jesenice unit of CSW Gorenjska (letter no. 060-1/2021-31887 of 10.3.2021)

*“We **have talks ongoing** with the owner **about the provision of an appropriate ramp and modification of toilets**. We will try to have both provided in the shortest possible time.”*

Slovenske Konjice unit of CSW Celje (letter no. 122-3/20212-31976/12 of 19.3.2021)

*“The unit is located on the 2nd floor. From the lobby to the ground floor, where the entrance to the lift is located, there are a few steps. By the stairs there is a **ramp but it can only be used by a wheelchair user with assistance since it is very steep**.”*

Slovenske Konjice unit of CSW Celje (letter no. 122-3/20212-31976/12 of 19.3.2021)

# ACCESSIBILITY OF CSWs FROM THE PERSPECTIVE OF MOVEMENT IMPAIRMENTS

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The main Ombudsman's findings about the accessibility of centres for social work regarding movement impairments in 2021, which were reported by the centres (if not specified otherwise), were:

- **Centres for social work or their 63 units operate in 69 different buildings across the country (some of the units operate in several buildings);**

[if a unit of a centre for social work operates in several buildings, the work process is most frequently organised in a manner that actions involving people with movement impairments are carried out in the building which is at least partly accessible for people with movement impairments]



*“The Velenje and Mozirje units have a lift, the Žalec unit does not have one, **but does have a stair lift.**”*

Žalec unit of CSW Savinjsko-Šaleška (letter no. 007-2/2022-31941/ of 1.2.2022)

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## ON THE PHYSICAL ACCESSIBILITY OF BUILDINGS AND PREMISES FOR PEOPLE WITH MOVEMENT IMPAIRMENTS

- **physical accessibility is arranged for three quarters (75 per cent or 47 of 63) of units of centres for social work (or just over three quarters of buildings (77 per cent) in which centres for social work operate are physically accessible for people with movement impairments);**

[we considered as appropriate the explanation that the unit is “physically accessible to people with disabilities” and that its “premises are physically accessible to people with disabilities”; a few units also stated that a lift or a ramp for access of people with disabilities to their building or premises is available when needed]



*“The building was **equipped with a lift when we moved in**, the same goes for the toilets which are adapted and accessible for people with disabilities. We immediately called the owner to arrange the access to the building in a manner that allows people with disabilities to **enter the office building.**”*

Murska Sobota unit of CSW Pomurje (letter no. 070-2/2021-31895/2 of 17.3.2021)

*“... we offer people with disabilities and older people who have difficulty accessing the business premises of our unit the possibility of having the **required service carried out at their home or at a location accessible to them.** However, **this makes the regular activities of the centre's unit difficult or makes it difficult to provide the service at the time the user wants** (for example, within working hours or business hours).”*

Sežana unit of CSW Južna Primorska (letter no. 909-11/2021-31933 of 26.4.2021)

- **just less than a quarter of buildings in which centres for social work operate are not appropriately physically accessible for people with movement impairments (10 per cent are completely inaccessible, 13 per cent are partially accessible, which makes a total of 23 per cent of buildings);**

[partial accessibility of buildings most frequently meant that the centre operates on several floors, while only the ground floor is accessible for people with movement impairments]

- **physical accessibility for people with movement impairments is not provided at all by four units of centres for social work (these are the Jesenice<sup>7</sup>, Sežana, Ribnica, and Idrija<sup>8</sup> units);**

[in real life, such physical inaccessibility is represented by the situation when a person with movement impairments cannot access the building or business premises of a centre for social work due to physical barriers, such as stairs, or when a unit or its premises are located on higher floors but there is no lift; here, units operating in several buildings from which at least one was at least partly accessible for people with movement impairments were not included]

- **12 units of centres for social work in the country are at least partly accessible for people with movement disabilities;**

[this category of partial accessibility includes units which operate in one building, but in which, for example, only the ground floor is accessible (which do not necessarily also include the centre for social work but the employees come there when needed; units which operate in several buildings and at least one of them is completely or at least partly accessible for people with movement impairments; units which are generally accessible but the access for people with movement impairments is not ideal (e.g. need an escort to enter or access higher floors))]



*“...the building in which CSW Koroška together with its Slovenj Gradec unit carries out its activities is **a listed building under monument protection and as such unsuitable for any kind of modification for easier access of people with various forms of impairments of disabilities** (meaning the installation of a lift or easier access).”*

*Slovenj Gradec unit of CSW Koroška (e-mail from 9.2.2022)*

*“This is an older building, probably built in the 19th century as a town villa and was later reconstructed and renovated for a different purpose. **Now, it is a listed building** as the Roethel-Schleimer villa. The building was **completely renovated** in 2012. /.../ Premises of the Kočevje unit are **physically accessible for people with disabilities**. A ramp is installed. The building encompassing a ground floor, a first floor, and an attic includes a lift. The premises include toilets accessible for people with disabilities.”*

*Kočevje unit of CSW Osrednja Slovenija - Zahod (letter no. 021-33/2021-31925/2 of 25.3.2021)*

7 The Jesenice unit has already seen a change – we were informed that the ramp and with it unhindered access for people with movement impairments were ensured at the end of January 2022.

8 For the Idrija unit we were also informed that a change had been made – they moved into new premises which meet all conditions in accordance with the Rules on minimum technical requirements for social assistance services providers (Official Gazette of the RS, nos. 67/06 and 135/21) and offer unhindered access for people with disabilities. The premises are supposedly also clearly marked for people with sensory impairments and appropriately lit.

## ON THE ACCESSIBILITY OF TOILETS FOR PEOPLE WITH MOVEMENT IMPAIRMENTS

- **Only 43 of 63 (68 per cent) units of centres for social work have toilets for people with disabilities; (the same percentage of buildings in which centres for social work operate have toilets for people with disabilities (47 of 69));**

[according to the statement of the unit, toilets were considered completely accessible if people with movement impairments can freely access toilets for people with disabilities without help from another person]



*“If asked, the unit informs the clients, **generally verbally**, that there are no toilets for people with disabilities.”*

Velenje unit of CSW Savinjsko-Šaleška (letter no. 007-45/2021-31941/2 of 25.3.2021)

- **There are 18 units of centres for social work in the country which have no<sup>9</sup> toilets for people with disabilities (almost a third (i.e. 20 of the total of 69, or 29 per cent) of the buildings in which centres for social work operate have no toilets for people with disabilities);**

*“Business premises of the Tolmin unit are located **in an older building in the crowded town centre**, where there is no possibility of providing a parking space for people with disabilities and the **dimensions of the building do not enable the modification of toilets** according to the standards for people with disabilities. Therefore, in the future, we will also be searching for more appropriate premises for the Tolmin unit.”*

Tolmin unit of CSW Severna Primorska (letter no. 070-2/2021-31968/2 of 10.3.2021)

- **One of the units (Jesenice) had toilets for people with disabilities provided, but the building in which it is located was not physically accessible for people with movement impairments (due to the stairs in front of the entrance and internal stairs for accessing the second floor where the premises of the centre for social work are located); hence, we could not consider these toilets to be accessible;**

*“The unit does not have toilets for people with disabilities. It was planned that the CSW and VDC will work together as one institution and thus toilets for people with disabilities remained in the premises of the VDC.”*

Lenart unit of CSW Maribor (unnumbered letter of 10.3.2021)



<sup>9</sup> Slovenske Konjice, Metlika, Trebnje, Sežana, Dravograd, Ravne na Koroškem, Slovenj Gradec, Ljubljana Bežigrad, Lenart, Slovenska Bistrica, Ribnica, Krško, Velenje, Ajdovščina, Idrija, Tolmin, Zagorje ob Savi, and Jesenice.



*“Our unit will arrange access this year **and thus also the use of toilets** for people with disabilities, which are already appropriately adapted within the premises.”*

Jesenice unit of CSW Gorenjska (letter no. 060-1/2021-31887 of 10.3.2021)

- **For two units it can be considered that toilets are partially accessible for people with movement impairments;**

[only in one case (Laško) does a unit which have toilets for people with disabilities available in one of the locations in which it operates but not in the other (they are five minutes apart); in the second case (Gornja Radgona), the unit did not have appropriate equipment in toilets for people with disabilities at the time of gathering information]

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## ON PARKING SPACES RESERVED FOR PEOPLE WITH DISABILITIES

- **nine (from the total of 69 or 13 per cent) buildings in which centres for social work operate do not have parking spaces reserved for people with disabilities;**

[Based on the data received, we found that the main problem of the lack of parking spaces for these units is their placement in the town centres where there is no room for parking spaces. The problem with the lack of parking spaces is solved with the possibility of short stops/parking in front of the entrance (Dravograd, Slovenj Gradec, Maribor Center, Murska Sobota, Žalec (side entrance), Ljubljana Center, Ljubljana Bežigrad (informed us that the provision of the parking space is “within the jurisdiction of the owner and manager of the building”))]



*“The centre has a carpark in front of the building, **but it is not marked for people with disabilities**. We will try to mark it as soon as possible.”*

Ravne na Koroškem unit of CSW Koroška (letter no. 350-1/2021-31917/2 of 10.3.2021)

- **two units of centres for social work do not provide any possibility of parking or short-term stopping for people with disabilities;**

[These are units in Tolmin and Sežana where, in addition to not have a parking space for anybody, only have access via a staircase, while parking in front of the unit is not even possible for emergency vehicles.]

- **three quarters (75 per cent) of buildings in which centres for social work operate have parking spaces especially reserved for people with disabilities;**

[For example, upon prior arrangement, the Ljubljana Šiška unit enables parking in a parking garage with direct access to the unit's premises. The Ruše, Grosuplje, Postojna, Ilirska Bistrica, Cerknica, Jesenice, and Škofja Loka units provide parking spaces for people with disabilities immediately in front of the entrance. Some of the units (Metlika, Maribor Tezno, Ljubljana Šiška, Slovenska Bistrica, Lendava) also reported that in addition to the parking space reserved for people with disabilities, they offer the possibility of short-term stopping of a vehicle, which can be considered a best practice example.]

- **eight (from the total of 69, i.e. 12 per cent) of the buildings in which centres for social work operate have partly reserved parking spaces for people with disabilities.**

[Under this category we assign those units of CSW which provide parking spaces reserved for people with disabilities at least in front of one building in which they operate (e.g. the Laško unit). Here, we also included those units which have parking spaces for people with disabilities but they are not appropriately marked (Slovenske Konjice, Ravne na Koroškem, Gornja Radgona units); units which do not have their own parking spaces or share parking spaces with others, i.e. are in wider use (Šmarje pri Jelšah (has two official parking spaces in front of the entrance which can be used also by people with disabilities, but they have not had such example), Piran, Ribnica, Celje (the Celje unit shares a huge carpark with a sports and shopping centre, but they assure us that there is always enough room, while it is also possible for a vehicle to drive up to the entrance to the building in which the unit is located)); and the Tržič unit, which has one parking space reserved for people with disabilities but in their words "the availability of the parking space is not guaranteed".]

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*“...marked parking spaces for people with disabilities are provided on the platform belonging to the building in which the CSW Kranj unit is located, which are approx. 25m away, but when using these parking spaces one needs to cross a busy road to enter the building...”*

Kranj unit of CSW Gorenjska (letter no. 021-348/2021-31887/2 of 7.7.2021)

*“The unit does not have a parking space for people with disabilities since the **office building of the CSW is located in the city centre.**”*

Center unit of CSW Maribor (unnumbered letter of 10.3.2021)

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# ACCESSIBILITY OF CSWs FROM THE PERSPECTIVE OF SENSORY IMPAIRMENTS

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The Ombudsman's questions to centres for social work concerning accessibility from the perspective of sensory impairments were selected or adapted and then classified into individual categories based on relevant legal bases and various manuals, for example manuals of the Ministry of the Environment and Spatial Planning *Strateško načrtovanje dostopnosti* (Strategic Accessibility Planning), *Univerzalna stanovanjska graditev* (Universal Housing Construction), and *Inkluzivno oblikovanje in dostop do informacije* (Inclusive Formation and Access to Information); a manual entitled *Priročnik o dostopnosti objektov v javni rabi* (Manual on the Accessibility of Public Structures and Buildings) by the Urban Planning Institute of the Republic of Slovenia, etc. Based on data acquired in the first third of 2022, the main findings of the Ombudsman regarding accessibility of centres for social work in respect of sensory impairments (if not otherwise specified) were:

- **the acquired responses indicate that the majority of units of centres for social work collaborate with users with hearing and visual impairments;**
- **87 per cent units of centres for social work reported that they collaborate with users with hearing impairments;**

[The Črnomelj and Ilirska Bistrica units reported that they do not collaborate with users with hearing impairments, while 10 per cent of units (Radovljica, Kranj, Ajdovščina, Logatec, Krško, Zagorje ob Savi) reported that they collaborate with users with hearing impairments only partially; the Zagorje ob Savi unit also added that they work with users with hearing impairments “rarely”]

- **86 per cent of units of centres for social work reported that they work with users with visual impairments;**

[Črnomelj, Krško, and Litija units reported that they do not work with users with visual impairments, while nine per cent of units (Radovljica, Kranj, Ajdovščina, Ljubljana Šiška, Logatec, Zagorje ob Savi) reported that they collaborate with users with visual impairments only partially; the Zagorje ob Savi unit also added that they work with users with visual impairments “rarely”]

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*“... we haven't had people with hearing impairments in our procedures or administrative procedures for many years.”*

Ilirska Bistrica unit of CSW Primorsko Notranjska (letter no. 023-4/2020-31879 of 22.4.2022)

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## ON ENTRANCES TO UNITS OF CENTRES FOR SOCIAL WORK

- **A good half (52 per cent) of units of centres for social work have an entrance that is clearly marked and offers unhindered access for people with hearing and visual impairments;**
- **Just under a fifth (17 per cent) of units of centres for social work do not have such entrance;**

[Mozirje, Žalec, Idrija, Velenje, Dravograd, Postojna, Jesenice, Slovenj Gradec (the reason is the preservation of monuments), Škofja Loka (“marked with standard signs, but do not have communication signs for people with hearing and visual impairments, but have not encountered any special problems due to this or people with sensory impairments have not expressed problems when visiting the centre since they generally arrived with an escort (e.g. sign language interpreter); in one case a blind user called on the telephone and our employee went to meet him at the entrance and escorted him to her office and out of it”); the Lenart and Trbovlje units reported that they have not recorded any difficulties arising from that]

- **According to reported data, 30 per cent of units of centres for social work have a partially marked entrance with unhindered access for people with hearing and visual impairments;**

[Trebnje, Ormož, Radlje ob Dravi, Ravne na Koroškem, Kranj, Ajdovščina, Koper, Piran, Izola, Ljubljana Vič Rudnik, Krško, Šentjur, Šmarje, Brežice, Cerknica, Hrastnik, Maribor Center (“a board is installed in front of the entrance”), Kočevje (“not equipped with acoustic or tactile features”), and Kamnik.]

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## ON LIFTS

- **According to the acquired data, 68 per cent of all units of centres for social work have a lift, while 32 per cent do not have one;**

[it should be added that the fact that there is no lift is not necessarily worrying in itself – premises of a centre for social work can be located (entirely) on the ground floor and the need for a lift does not exist]



*“All premises intended for working with customers are located on the ground floor and do not have any stairs or other barriers.”*

Tržič unit of CSW Gorenjska (e-mail from 10.3.2021)

*“Operates on the ground floor physically accessible for people with disabilities.”*

Ruše unit of CSW Maribor (unnumbered letter of 10.3.2021)

- **Of the total of 43 units of centres for social work that have a lift, only in 26 per cent it is accessible for use by people with hearing or visual impairments (well-marked, lit, equipped with acoustic and tactile features);**

[Ptuj, Radlje ob Dravi, Ravne na Koroškem, Nova Gorica, Vrhnika, Logatec, Šentjur, Maribor Tezno, Maribor Center, Kamnik, and Litija]



*“Considering the selection of buttons (touch system), it is made very difficult for people with visual impairments.”*

Litija unit of CSW Osrednja Slovenija – Vzhod (letter no. 070-1/2022-31860/2 of 10.2.2022)

- **in 14 per cent of units of centres for social work that have a lift, the lift is not appropriately equipped or accessible for people with hearing or visual impairments;**

[Ljubljana Bežigrad and Ljubljana Center, in their words, do not encounter problems because of the lift which is not accessible for people with hearing or visual impairments, “by the lift, on the ground floor of the office building, is a doorman or a receptionist who would, if needed, help a person with a sensory impairment”; Ljubljana Vič Rudnik, according to their words, do not encounter difficulties due to the lift which is not accessible for people with hearing or visual impairments; Trbovlje “does not encounter difficulties due to this since they tackle such problems individually (for example, an employee arranges to meet the user in front of the building and accompany them into and out of the office), in such cases; if agreed by the user, they also work in the field”, and Slovenske Konjice.]

- **in 60 per cent of units of centres for social work from the total of 43 which actually have a lift, the lift is partially accessible for people with hearing or visual impairments;**

[In relation to marking their access to the lift, the units stated hereafter reported in their first response to the questionnaire or in their responses to additional inquiries added the following: that the lifts lack, for example, acoustic equipment: Jesenice (“not equipped with acoustic features”); Murska Sobota (“we lack acoustic signs”); Cerknica (“tactile features”). The following state that the lifts lack acoustic and tactile features: Tržič (“lit, marked, but without acoustic or tactile signs, offices for customers are located on the ground floor, only management is located on the first floor”); Škofja Loka (“marked and lit – yes, equipped with acoustic and tactile features – no”); Gornja Radgona (“not equipped with acoustic and tactile features”); Ljubljana Šiška (“acoustic and tactile no, the rest yes”); Brežice and Sevnica (“marked, lit”); Pesnica (“the lift is well marked and lit, not equipped with acoustic and tactile features”); Lenart (“the lift is well marked and lit, it is not equipped with acoustic and tactile features, have not encountered any problems”); Kočevje (“not equipped with acoustic or tactile features”).]

[The Postojna, Domžale, Radovljica, Novo mesto, Trebnje, Lendava, Ljutomer, Mozirje, Velenje, Ormož, Kranj, Piran, Ljubljana Moste Polje, Celje, and Laško units did not provide any specifics in addition to marking partial accessibility or make any concrete comments about the accessibility of lifts for people with hearing or visual impairments.]

## ON HALLS (WAITING ROOMS) OR EQUIPMENT

- **Only a minority (44 per cent) of units of centres for social work have access from the entrance to the unit's premises clearly marked and offer unobstructed access for people with sensory impairments;**



*“Access is generally unobstructed but **is not additionally marked** with floor signs for the blind and partially sighted, for example.”*

Tolmin unit of CSW Severna Primorska (e-mail from 3.5.2022)

*“...access is marked with standard signs, **but we do not have communication signs** for people with hearing or visual impairments.”*

Škofja Loka unit of CSW Gorenjska (letter no. 070-3/2022-31887 of 25.4.2022)

- **Almost a fifth (18 per cent) of units of centres for social work do not have access from the entrance to the unit's premises clearly marked and which offers unobstructed access for people with sensory impairments;**

[Slovenj Gradec (the reason is the protection of monuments), Tolmin, Ajdovščina (“a move planned for the end of 2022, when access from the entrance to the unit's premises will be clearly marked and unobstructed, currently employees help such people and escort them to the office”), Maribor Center (the unit shares the main entrance with a smaller shop, access to the unit is clearly marked, according to the unit they have not encountered any problems yet), Lenart (according to the unit, they have not yet encountered any problems), Jesenice (they answered for the accessibility for people with visual impairments, for whom there are no special signs (e.g. Braille writing), therefore they answered no, the Jesenice unit is located in a building with no other activities but their own), Sežana (explains that “they encounter such cases. Quite a few of their customers are blind or partially sighted. Since these are customers from “the local environment”, they are familiar with the fact that the premises are located on the second floor and that they are not the easiest to access. Customers usually call in advance (on the telephone or by e-mail) and the employee welcomes them at the entrance and escorts them to the office and then back. Since the implementation of personal assistance, the situation has greatly improved because the majority of people with disabilities have a personal assistant who also takes care of the access to CSW premises”), Dravograd, Idrija, Škofja Loka, and Trbovlje.]

- **For 38 per cent of units of centres for social work it can be considered that they have access from the entrance to the unit's premises partly available for people with sensory impairments;**

[Radovljica, Trebnje, Mozirje, Žalec, Velenje, Ormož, Radlje ob Dravi, Ravne na Koroškem, Kranj, Koper, Piran, Izola, Ljubljana Bežigrad, Ljubljana Vič Rudnik, Ljubljana Moste Polje, Grosuplje, Krško, Šentjur, Šmarje, Brežice, Postojna, Domžale, Hrastnik, and Kamnik.]

- **Appropriate lighting of premises is provided by the majority (94 per cent) of all units of centres for social work;**



*“Suitable lighting of premises – ‘partly’. The answer is supplemented with the statement that premises of CSW Zasavje, Hrastnik unit, are **located in the basement of the building**, which consequently means **a need for additional lighting with artificial light (lights).**”*

Hrastnik unit of CSW Zasavje (letter no. 070-1/2021-31844 of 5.5.2022)

- **Appropriate lighting was not provided by the Dravograd and Idrija units, while the Jesenice and Hrastnik units provide only partly appropriate lighting of their premises;**

[The Jesenice unit additionally explains: “The suitability of lighting in the unit’s premises is in accordance with the standards and applicable laws, for which control measurements are made by experts. For this question, we pose a critical note and also assess the suitability of lighting for the surroundings of the CSW, in front of the entrance. For this reason we answered partly.” The Hrastnik unit explained that their premises are located in the basement of the building, consequently causing the need for additional lighting of the premises with artificial light (lights).]

- **70 per cent of units of centres for social work provide spaces protected from noise, while 16 per cent of the units do not;**

[Radovljica, Dravograd, Idrija, Koper, Piran, Celje, Brežice, Sevnica, Maribor Center, and Lenart]

- **14 per cent of units of centres for social work (Ormož, Jesenice, Ajdovščina, Sežana, Pesnica, Ruše, Ilirska Bistrica, Hrastnik, and Gornja Radgona) reported that their premises are only partially protected from noise;**

[The Ilirska Bistrica unit additionally explained: “Disturbing noise is due to the vicinity of the main road”, and Gornja Radgona: “we do not have additional special protection”.]

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## ON SIGNS AND INFORMATION IN UNIT PREMISES

- **Only just over a tenth (11 per cent) of units of centres for social work have a system of communication signs for orientation arranged, which is intended for people with hearing and visual impairments, including the signs for emergency exits and evacuation pathways;**

[Slovenj Gradec, Tržič, Nova Gorica, Vrhnika, Ljubljana Center, Cerknica, Litija]

- **60 per cent of units of centres for social work do not have a system of communication signs for orientation for people with hearing and visual impairments;**

- **29 per cent of units have a partly arranged system of communication signs for orientation for people with hearing and visual impairments;**

[Trebnje, Metlika, Domžale, Ormož, Radlje ob Dravi, Ravne na Koroškem, Tolmin, Idrija, Ajdovščina, Ljubljana Bežigrad, Logatec, Celje, Laško, Šentjur, Slovenska Bistrica, Lenart, Ribnica (provides illuminated signs and wall stickers for emergency exits), Gornja Radgona (according to their statement provides signs for emergency exits), and Kamnik (according to their explanation they provide signs for emergency exits and evacuation)]

- **Only one of all the units of centres for social work, the Nova Gorica unit, has tactile signs for the orientation of the blind and partially sighted;**

- **The great majority (94 per cent) of units of centres for social work do not have tactile signs for the orientation of the blind and partially-sighted;**

- **Three units of centres for social work have partly installed tactile signs for the orientation of the blind and partially-sighted;**

[Ormož, Slovenska Bistrica, and Ptuj, where, in their words, they are provided “at the staircase”]

- **None of the units of centres for social work provides signs and symbols in relief or signs in Braille writing;**

[only two units reported partial compliance, the Slovenska Bistrica and Ptuj units, which, in their words, provide signs in “the lift”]

- **Just over a tenth (11 per cent) of all units of centres for social work have big signs and enlarged writing on signs with a strong visual contrast (while 75 per cent of units do not have such signs);**

[Trebnje, Tolmin, Nova Gorica, Vrhnika, Sevnica, Ilirska Bistrica, Cerknica]

- **14 per cent of units are partly equipped with signs;**

[Koper, Piran, Izola, Logatec, Grosuplje, Celje, Laško, Slovenska Bistrica, and Kamnik, which, in their words, have enlarged signs on doors]

- **None of the units of centres for social work have displays of written information or video players with videos presenting important information in sign language and with subtitles;**

- **Just over half (51 per cent) of all units of centres for social work have accessible, easily readable and understandable information panels and other information at a place easily accessible for all, while these are lacking in just over a fifth (22 per cent);**

[Radovljica, Gornja Radgona, Dravograd, Jesenice, Idrija, Sežana, Ljubljana Center, Šentjur, Šmarje, Postojna, Kočevje, Trbovlje, Hrastnik, Črnomelj]

- **Just over a quarter (27 per cent) of all units of centres for social work have only partly accessible, easily readable and understandable information panels and other information at a place easily accessible for all;**

[Novo mesto, Mozirje, Žalec, Velenje, Ormož, Ajdovščina, Koper, Piran, Izola, Ljubljana Bežigrad, Ljubljana Vič Rudnik, Krško, Brežice, Pesnica, Lenart, Domžale, and Kamnik, which additionally explained: "we have signs written in big letters on the entrance door"]

- **Other information-communication technology for people with sensory impairments is used only by the Ljubljana Bežigrad unit (partial use is provided only by the Laško unit, which, according to their explanation, uses a magnifying glass, while the great majority of other units (97 per cent) do not use such information-communication technology);**

- **A hearing loop is not installed in any of the units of centres for social work;**



*“Representatives of their organisation presented their problems regarding barriers in communication, especially problems with understanding hearing speakers since the hearing majority seldom master sign language as the natural language of the deaf, to the Ombudsman. Due to the desire of hard-of-hearing people to be less dependent on the hearing environment, **the Ombudsman installed a hearing loop in its premises**. This electromagnetic communication system enables users of hearing aids to understand what is said in noisy spaces because it eliminates interferences such as echoes, murmurs, and crackling, which can otherwise appear. /.../ The Ombudsman will enable also such communication to the hard-of-hearing with two portable hearing loops at its monthly outreach operation outside the headquarters.”*

Annual Report of the Human Rights Ombudsman for 2017 (p. 371)

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## ON PROVIDING HELP

- **Almost three quarters (72 per cent) of units of centres for social work provide a sign language interpreter, while 14 per cent do not;**

[Ljubljana Šiška, Šentjur, Šmarje pri Jelšah, the Radovljica unit additionally states that: “we communicate with our users with hearing impairments without an interpreter if we can generally understand each other with the user (for example, when exercising rights from public funds). In other cases, users seek the help of a sign language interpreter on their own or with our help”; the Dravograd unit additionally explains: “When handling cases of deaf-mute users who need an interpreter, the users have always handled matters with the help of their escorts or on their own, even when it comes to exercising their right to an interpreter. We presented matters to them in an appropriate manner and their right to an interpreter was met. We also help them exercise any other potential service or rights”; the Izola unit adds: “We have a sign language interpreter at the Koper unit, who is used by all units when needed (Izola, Piran, and Sežana)”; the Ilirska Bistrica and Cerknica units justified their negative reply with the statement that they have not dealt with a deaf person for several years. “If we were dealing with people with hearing impairments, they would be provided with an interpreter. Deaf people also have the right to vouchers for interpreters. Many years ago, when we had hearings with deaf people, they used their vouchers and brought an interpreter to the hearing whom they arranged for themselves”; the Zagorje ob Savi units stated: “Employees at the unit do not have the knowledge, the skills of communicating with the users through sign language; therefore, in cases when a sign language interpreter needs to be engaged, we use one from the ZZTSZJ list. We had a case of collaborating with a sign language interpreter at the CSW together with the user. The cooperation was efficient, successful. Until now, the Zagorje ob Savi unit has not detected problems that could not be solved in cooperation with the users or their relatives.”]

- **14 per cent of units of centres for social work provide a sign language interpreter in part;**

[the Radlje ob Dravi unit stated that they provide an interpreter “if needed, in administrative procedures the CSW is obliged ex officio to provide an interpreter. Some of our employees also attended a sign language course, which helps when communicating with deaf people. Some of our users independently arrange for an interpreter who accompanies them to the CSW and helps them sort matters”; the Ravne na Koroškem unit also provides an interpreter “when needed, in administrative procedures the centre for social work is obliged to provide an interpreter ex officio. Some of our users independently arrange for an interpreter who accompanies them to the CSW and helps them sort matters. We have also been noticing that some of the users lip read very well and so in many cases there has been no need for an interpreter and the communication and understanding has been ensured from both sides. Accordingly, employees speak slower and more clearly and check whether the user has understood what was said”; the Tržič unit provides a sign language interpreter “upon arrangement” or provides “a sign language interpreter to clients with a hearing impairment in accordance with the Act Regulating the Use of Slovene Sign Language. In practice, such cases are very rare, if a client within a proceeding demands a sign language interpreter, we provide one. Since the unit does not have any employees who are proficient in sign language or an interpreter who is available for clients at all times, the hearing date is always synchronised with the client and the presence of an interpreter. We have not encountered any problems with this”; the Škofja Loka unit also provides an interpreter “when needed” or as they additionally explain: “until now this has been done in such a way that, for example, a deaf person communicated by mail (and recently mostly by e-mail) the need for our service, after which our employee reached out to an interpreter and they agreed upon a date to perform a service. Such cases are rare and we have not had any special problems so far. We have one example of a deaf-mute user on the rights from public funds. Prior to the submission of an application, the interpreter (who is present in the room where the user is) calls our employee, they exchange information, and then the application is brought to the centre by the user himself (at his own request). Our employees then communicate with him very slowly, while the user reads her lips, occasionally they write something down on paper and so far we have not had any problems. The user expresses satisfaction”; the Idrija unit provides an interpreter if they have a visit scheduled, but does not have a sign language interpreter present if a user comes to the CSW unannounced. They solve such problems by scheduling interviews in advance together with the users and provide an interpreter on time; the Piran and Sežana units, as Izola stated above, provide an interpreter who is available at the Koper unit; the Hrastnik unit provides an interpreter by agreement, they do not have an employee who can communicate in sign language. For the users’ needs an outside person is available with such knowledge who is at their disposal upon prior arrangement, as the unit states that so far they have not had “problems with sign language interpreters, since in practice users have come to the CSW with a sign language interpreter”; and the Lendava unit which provides an interpreter “by agreement”]

- **Assistance from another person while accessing information or services for people with sensory impairments is provided by well over half (57 per cent) of all units of centres for social work;**

[such assistance is not provided by just over a quarter (27 per cent); these are Jesenice, Radovljica, which additionally states that: “on arrival at the CSW unit, people with sensory impairments or persons with hearing or visual impairments are generally assisted by a unit employee. That means that the employee accompanies the user to the expert caseworker who offers the user all the information or assistance. If needed, an interpreter is provided”; Dravograd, where “when needed, users come to

handle their affairs with an escort or arrange in advance to be met by an expert caseworker so that the employee can welcome them personally and accompanies them, if needed, into the unit, which is, naturally, possible due to the smallness of the unit and thus greater closeness to the user"; Tolmin does not have a person specifically in charge of giving and providing access to information for people with a sensory impairment, they have not encountered problems. Assistance is provided by every expert caseworker to the best of their abilities and knowledge if a person with sensory impairments needs help. If it is a matter of public authority and a person with a sensory impairment makes an appointment, an interpreter is provided; Idrija has not encountered problems due to the non-provision of help by another person, "appropriate help is also provided by expert caseworkers"; Ilirska Bistrica justified their negative answer with the fact that they have not had "examples of dealing with people with sensory impairments for a long time", if they had dealings with people with sensory impairments, these people would be provided with the "assistance of another person (an interpreter.)"; Kočevje and Ribnica offer assistance to people with sensory impairments through their expert caseworkers,

"usually, people with sensory impairments bring along escorts who provide them with assistance"; Zagorje ob Savi clarified that the people employed at the unit are not "equipped with the knowledge which would enable them to give information in an understandable manner to users with more expressed sensory impairments (autism, ADHD disorders, blind and deaf people, etc.)." Thus, in such situations they use "the help of the user's parents, the user's relatives, interpreters from the ZZTSZJ list, school services (if the user is a child attending a school with an adapted education programme). The Zagorje ob Savi unit has not yet encountered any problems which we could not handle in collaboration with users or their relatives"; Vrhnika, Šentjur, Šmarje, Pesnica, Ruše, Ajdovščina, and Slovenska Bistrica units have not encountered problems]

- **6 per cent of units of centres for social work provide partial assistance from another person while accessing information or services for people with sensory impairments;**

[Brežice, Sevnica, Lenart, Domžale, and Radlje ob Dravi which explains that some of the caseworkers "have attended a sign language course, which helps in communication with deaf people. Frequently, our users with hearing impairments also use communication via e-mail or writing messages to the office mobile phone at which we are always available and answer promptly"; Ravne na Koroškem provides help if needed, "our users with hearing impairments often also use communication via e-mail or writing messages to the office mobile phone at which we are always available and answer promptly. Our centre has one case of a deaf-mute person; her partner does not have these problems and they always come to the centre together, so that there is no problem accessing the information"; Tržič additionally clarifies that "until now our practice is that people with sensory impairments have always been accompanied by relatives or other people close to them when coming to the unit; when needed and with the consent of the client, these people engaged in the discussion (primarily in procedures of enforcing rights where the emphasis is on informing). The unit does not currently have an additional person employed who is available for people with sensory impairments; in the past the assistance in the form of escorting, home visits, etc. was offered to a person with a visual impairment by a participant in a public work programme. In the last two years, the unit has been withdrawn from the public work programme"; Škofja Loka adds that the answer "pertains to (generally rare) cases when a blind or severely partially sighted person comes to the CSW (for example by advance arrangement), the person is welcomed at the entrance by the expert caseworker and accompanied to the office where the service is performed. Until now, we have not had any complaints regarding access to information or services by people with sensory impairments and no problems have been detected that would make the service difficult or prevent executing it"; Ljubljana Moste Polje does not encounter problems when providing

the assistance of another person while accessing information or services for people with sensory impairments. “The “partly” answer is given because the person who provides help during office hours is a receptionist, while outside office hours this is an expert caseworker or a receptionist”; Hrastnik provides help by arrangement, “if they are not able to understand the published notices in the Hrastnik unit, people with sensory impairments can ask for the assistance of an expert caseworker at the unit who offers them information in a manner understandable to them. If a person with the knowledge of sign language is needed, such a person is contacted. Until now, the Hrastnik unit has not had problems with such a manner of communication”; and Gornja Radgona, which states that they provide help when needed]

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## ON E-ACCESSIBILITY

- **e-accessibility of websites and other media for people with sensory impairments is provided by 16 per cent of units of centres for social work;**

[Novo mesto, Črnomelj, Gornja Radgona, Ljutomer, Ljubljana Šiška, Logatec, Ljubljana Center, Šentjur, Sevnica, Cerknica]

- **65 per cent of units of centres for social work do not provide such accessibility;**
- **The answers of almost a fifth (19 per cent) of units of centres for social work reflect that they partly provide e-accessibility.**

[these are: Metlika; Ormož; Tržič, which only provides enlarged letters or explains that “that they have a web subpage set up within the unified website of all CSWs in Slovenia (<https://www.csd-slovenije.si/>). This website publishes all general information regarding centres for social work, while contact and other information of each centre and unit is published on an individual subpage. The webpages are designed in a such a way that people with sensory impairments can enlarge the letters, and there are no other functions available for people with sensory impairments”. Škofja Loka clarifies that the webpage of “centres for social work is edited by the operator at the Association of Social Work Centres of Slovenia, while individual centres or units do not have the possibility of direct editing. The user (for example a partially sighted person) can enlarge the letters which enables them to follow the website; this can also be done while reading and writing e-mails. We do not have other technical solutions for e-accessibility for people with sensory impairments”; Ljubljana Moste Polje additionally clarifies: “we marked partly for e-accessibility because the website has text divided into paragraphs and the contrast is used”; Ribnica gave an explanation that “the website is partly accessible. More is written in the accessibility statement. Link: <https://www.csd-slovenije.si/dostopnost/>”; Hrastnik

“The website of CSW Zasavje is accessible to all users of the web provided by web players through the mobile devices of an individual user. The Hrastnik unit does not have an independent website for providing information”; Pesnica, Slovenska Bistrica, Maribor Tezno, Ruše, Maribor Center, and Lenart units explained that they have not encountered any problems regarding the partial accessibility of their websites.]

# COLLECTION OF OMBUDSMAN'S PROPOSALS FOR IMPROVEMENT OF THE SITUATION

Based on Article 7 of the ZVarCP, the Ombudsman can address proposals, opinions, criticisms, or recommendations to various bodies. Pertaining to the issue in question, the Ombudsman addresses the following:

- 1. With reference to Article 25 of the Equalisation of Opportunities for Persons with Disabilities Act (Official Gazette of the RS, nos. 94/10, 50/14, and 32/17), the Ombudsman proposes that centres for social work as a provider of public authority estimate whether, including through the training of their employees, they create conditions to the sufficient extent for the equal treatment of people with disabilities and seek opportunities to (further) improve this aspect of their obligations.**



*“State bodies, local self-governing bodies, providers of public authority, public service contractors, and public media in accordance with their competencies should create conditions with normative measures and directives, as well as the training of their employees, for the equal treatment of persons with disabilities by raising awareness in society and monitoring the social status of people with disabilities.”*

Article 25 of the Equalisation of Opportunities for Persons with Disabilities Act (Official Gazette of the RS, nos. 94/10, 50/14, and 32/17)

2. The Ombudsman recommends that centres for social work, in collaboration primarily with local non-governmental organisations for people with sensory impairments, determine how they could (further) improve their accessibility for them and then ensure the adjustments are implemented.

“... the provision of Paragraph 3 of Article 4 of the MKPI binds the contracting states to **“thoroughly consult with people with disabilities”** in the **preparation and implementation of the legislation and policies** of the convention.”

...from the Annual Report of the Human Rights Ombudsman of the Republic of Slovenia for 2011 (p. 254)

“Last year, **together with the Nova Gorica Inter-Municipal Association of the Blind and Visually Impaired and Zavod Pristop, we synchronised adjustments for blind and partially sighted people.** The City Municipality of Nova Gorica has prepared an accessibility strategy for people with sensory impairments, with which we entirely comply at the centre.”

Nova Gorica unit of CSW Severna Primorska (e-mail from 9.2.2022)

“...simultaneously, **we participate as a member in the Panel for People with Disabilities of the Municipality of Laško,** where the Municipality of Laško adopted the charter entitled 'Občina po meri invalidov' in 2015. The Panel continues to discuss possible improvements and getting closer to people with disabilities both by eliminating architectural changes, installation of hearing loops and tactile signage, and with content that involves the possibility of filling their time or additional benefits that can be used in their local environment.”

Laško unit of CSW Celje (letter no. 122-3/20212-31976/12 of 19.3.2021)



“Generally, the Ombudsman believes that **the accessibility of the built environment for people with disabilities cannot be separated from accessibility of the service offered in these building.**”

Human Rights Ombudsman in its Annual Report for 2021 (p. 203)

3. The Ombudsman proposes to the Ministry of Labour, Family, Social Affairs and Equal Opportunities that now, when the Government of the Republic of Slovenia has determined the text for the proposal of the Act on Accessibility to Products and Services for People with Disabilities, considering also the text on pages 201 to 206 of the Ombudsman’s Annual Report for 2021, they once again and comprehensively study the issue of supervisory bodies in accordance with individual articles (primarily Articles 9 and 8) from the section on prohibiting discrimination due to disability in the ZIMI, and then draw up a proposal of necessary changes in this part.

“Considering the fact that **the mentioned act [Act on Accessibility to Products and Services for People with Disabilities] will regulate all disputed areas of accessibility**, the MDDSZ proposes that the existing legal vacuums not be regulated by new subordinate acts deriving from the ZIMI, because individual fields will be regulated by the new legislation.”

Ministry of Labour, Family, Social Affairs and Equal Opportunities (letter no. 070-43/2021/7 of 13.12.2021)

“The promises of ministers and the government once again turned out to be empty, for even at the time of preparing this report, **we do not have subordinate acts which, arising from the law and the promises of ministries and the government, should have been adopted long ago**, hence the Ombudsman can only repeat the recommendation.”

Human Rights Ombudsman in the Annual Report for 2013 (p. 50)

“The Ombudsman is pleased to find that the state adopted the Equalisation of Opportunities for Persons with Disabilities Act (ZIMI), which significantly contributes to the realisation of the Convention on the Rights of Persons with Disabilities, despite the fact that both disability organisations and the Ombudsman believe that the **ZIMI did not solve the question of implementation of controls appropriately.**”

Annual Report of the Human Rights Ombudsman of the Republic of Slovenia for 2010 (p. 17)

*“To enforce the Convention on the Rights of Persons with Disabilities and the Equalisation of Opportunities for Persons with Disabilities Act, the **Ombudsman recommends the speedy adoption of subordinate acts** and measures for actual equalisation of opportunities for people with disabilities.”*

Annual Report of the Human Rights Ombudsman of the Republic of Slovenia for 2012 (p. 59)

4. With reference to Paragraph 2 of Article 38 of the Equalisation of Opportunities for Persons with Disabilities Act – ZIMI (Official Gazette of the RS, no. 94/10), the Ombudsman proposes that the Ministry of Labour, Family, Social Affairs and Equal Opportunities devote special attention to the elimination of communication barriers at centres for social work and, in collaboration with them, ensure that such examples of adjustment are also made in a timely way in the buildings in which they operate.

“

*“States Parties shall also take appropriate measures to:*

- a) ***Develop, promulgate and monitor the implementation of minimum standards and guidelines for the accessibility of facilities and services open or provided to the public...***

... from Article 9 of the Convention on the Rights of Persons with Disabilities

5. The Ombudsman proposes to the Government of the Republic of Slovenia that in reports, with which, in accordance with Paragraph 7 of Article 49a of the Social Assistance Act (Official Gazette of the RS, nos. 3/07 – official consolidated version, 23/07 – corr., 41/07 – corr., 61/10 – ZSVarPre, 62/10 – ZUPJS, 57/12, 39/16, 52/16 – ZPPreb-1, 15/17 – DZ, 29/17, 54/17, 21/18 – ZNOrg, 31/18 – ZOA-A, 28/19, 189/20 – ZFRO, and 196/21 – ZDOsk) it informs the National Assembly every three years about the efficiency of operation of centres for social work and units of centres for social work in the areas where they were founded, it devotes special attention to accessibility of people with movement and sensory impairments.

# APPENDIX

TABLE 1: ACCESSIBILITY OF CSWs REGARDING MOVEMENT IMPAIRMENTS (1.2-5/2021)

|   | Date of the CSWs response to the Ombudsman's inquiry from 5.3.2021 | Date of the CSW's response to Ombudsman's additional inquiries (if made) |
|---|--|--|
| <b>CENTRE FOR SOCIAL WORK CELJE</b>                     | Letter no. 122-3/2021-31976/12 of <b>19. 3. 2021</b>               |  |
| <u>UNIT CELJE</u>                                       | <b>19.3.2021</b>   |  |
| <u>UNIT LAŠKO</u>                                       | <b>19.3.2021</b>   | <b>16.4.2021 and 16.11.2022</b>  |
| <u>UNIT SLOVENSKE KONJICE</u>                           | <b>19.3.2021</b>   | <b>14.4.2021</b>   |
| <u>UNIT ŠENTJUR PRI CELJU</u>                           | <b>19.3.2021</b>   |  |
| <u>UNIT ŠMARJE PRI JELŠAH</u>                           | <b>19.3.2021</b>   |  |
| <b>CENTRE FOR SOCIAL WORK DOLENJSKA IN BELA KRAJINA</b> | Letter no. 099-1/2021-31909/2 of <b>11.3.2021</b>                  |  |
| <u>UNIT ČRNOVELJ</u>                                    | <b>11.3.2021</b>   |  |
| <u>UNIT METLIKA</u>                                     | <b>11.3.2021</b>   |  |
| <u>UNIT NOVO MESTO</u>                                  | <b>11.3.2021</b>   |  |
| <u>UNIT TREBNJE</u>                                     | <b>11.3.2021</b>   |  |
| <b>CENTRE FOR SOCIAL WORK GORENJSKA</b>                 |  |  |
| <u>UNIT JESENICE</u>                                    | <b>10.3.2021</b>   | <b>10.5.2021 and 16.11.2022</b>  |
| <u>UNIT KRANJ</u>                                       | <b>7.7.2021</b>  |  |
| <u>UNIT RADOVLJICA</u>                                  | <b>10.3.2021</b>   |  |
| <u>UNIT ŠKOFJA LOKA</u>                                 | <b>17. 3. 2021</b>   |  |
| <u>UNIT TRŽIČ</u>                                       | <b>10. 3. 2021</b>   |  |
| <b>CENTRE FOR SOCIAL WORK JUŽNA PRIMORSKA</b>           | Letter no. 909-11/2021-31933 of <b>23.3.2021</b>                   |  |
| <u>UNIT IZOLA</u>                                       | <b>23.3.2021</b>   |  |
| <u>UNIT KOPER</u>                                       | <b>23.3.2021</b>   |  |
| <u>UNIT PIRAN</u>                                       | <b>23.3.2021</b>   |  |
| <u>UNIT SEŽANA</u>                                      | <b>23.3.2021</b>   | <b>26.4.2021</b>   |
| <b>CENTRE FOR SOCIAL WORK KOROŠKA</b>                   | Letter no. 350-1/2021-31917/2 of <b>10.3.2021</b>                  |  |
| <u>UNIT DRAVOGRAD</u>                                   | <b>10.3.2021</b>   | <b>15.11.2022</b>  |
| <u>UNIT RADLJE OB DRAVI</u>                             | <b>10.3.2021</b>   |  |
| <u>UNIT RAVNE NA KOROŠKEM</u>                           | <b>10.3.2021</b>   | <b>15.11.2022</b>  |
| <u>UNIT SLOVENJ GRADEC</u>                              | <b>10.3.2021</b>   | <b>9.4.2021 in 15.11.2022</b>  |
| <b>CENTRE FOR SOCIAL WORK LJUBLJANA</b>                 | Letter no. 020-108/2021-31984/2 of <b>22.3.2021</b>                |  |
| <u>UNIT GROSUPLJE</u>                                   | <b>22.3.2021</b>   | <b>17.11.2022</b>  |

|  |  |                   |
|--|--|-------------------|
| <u>UNIT LJUBLJANA BEŽIGRAD</u>                           | <b>22.3.2021</b>   |                   |
| <u>UNIT LJUBLJANA CENTER</u>                             | <b>22.3.2021</b>   |                   |
| <u>UNIT LJUBLJANA MOSTE POLJE</u>                        | <b>22.3.2021</b>   |                   |
| <u>UNIT LJUBLJANA ŠIŠKA</u>                              | <b>8.3.2021, 22.3.2021</b>                                     |                   |
| <u>UNIT LJUBLJANA VIČ RUDNIK</u>                         | <b>22.3.2021</b>   |                   |
| <u>UNIT LOGATEC</u>                                      | <b>22.3.2021</b>   |                   |
| <u>UNIT VRHNIKA</u>                                      | <b>22.3.2021</b>   |                   |
| <b>CENTRE FOR SOCIAL WORK MARIBOR</b>                    | e-pismo of <b>10.3.2021</b><br>(received on <b>16.3.2021</b> ) |                   |
| <u>UNIT LENART</u>                                       | <b>10.3.2021</b>   |                   |
| <u>UNIT MARIBOR CENTER</u>                               | <b>10.3.2021</b>   |                   |
| <u>UNIT MARIBOR TEZNO sedež</u>                          | <b>10.3.2021</b>   |                   |
| <u>UNIT PESNICA</u>                                      | <b>10.3.2021</b>   |                   |
| <u>UNIT RUŠE</u>   | <b>10.3.2021</b>   |                   |
| <u>UNIT SLOVENSKA BISTRICA</u>                           | <b>10.3.2021</b>   | <b>18.11.2022</b> |
| <b>CENTRE FOR SOCIAL WORK OSREDNJA SLOVENIJA - VZHOD</b> | Letter no. 070-1/2021-31860/2<br>of <b>24.3.2021</b>           |                   |
| <u>UNIT DOMŽALE</u>                                      | <b>24.3.2021</b>   |                   |
| <u>UNIT KAMNIK</u>                                       | <b>24.3.2021</b>   |                   |
| <u>UNIT LITIJA</u>                                       | <b>24.3.2021</b>   |                   |
| <b>CENTRE FOR SOCIAL WORK OSREDNJA SLOVENIJA - ZAHOD</b> | Letter no. 021-33/2021-31925/2<br>of <b>25.3.2021</b>          |                   |
| <u>UNIT KOČEVJE</u>                                      | <b>25.3.2021</b>   |                   |
| <u>UNIT RIBNICA</u>                                      | <b>25.3.2021</b>   |                   |
| <b>CENTRE FOR SOCIAL WORK POMURJE</b>                    | Letter no. 070-2/2021-31895/2<br>of <b>17.3.2021</b>           |                   |
| <u>UNIT GORNJA RADGONA</u>                               | <b>17.3.2021</b>   | <b>14.11.2022</b> |
| <u>UNIT LENDAVA</u>                                      | <b>17.3.2021</b>   |                   |
| <u>UNIT LJUTOMER</u>                                     | <b>17.3.2021</b>   |                   |
| <u>UNIT MURSKA SOBOTA</u>                                | <b>17.3.2021</b>   |                   |
| <b>CENTRE FOR SOCIAL WORK POSAVJE</b>                    | Letter no. 140-1/2021-31852<br>of <b>19.3.2021</b>             |                   |
| <u>UNIT BREŽICE</u>                                      | <b>19.3.2021</b>   |                   |
| <u>UNIT KRŠKO</u>  | <b>19.3.2021</b>   |                   |
| <u>UNIT SEVNICA</u>                                      | <b>19.3.2021</b>   |                   |
| <b>CENTRE FOR SOCIAL WORK PRIMORSKO-NOTRANJSKA</b>       | Letter no. 070-2/2020-31879/3<br>of <b>25.3.2021</b>           |                   |
| <u>UNIT CERKNICA</u>                                     | <b>25.3.2021</b>   |                   |
| <u>UNIT ILIRSKA BISTRICA</u>                             | <b>25.3.2021</b>   |                   |
| <u>UNIT POSTOJNA</u>                                     | <b>25.3.2021</b>   |                   |

|   |  |                                 |
|---|--|---------------------------------|
| <b>CENTRE FOR SOCIAL WORK SAVINJSKO-ŠALEŠKA</b> | Letter no. 007-45/2021-31941/2<br>of <b>25.3.2021</b>                        |                                 |
| <u>UNIT MOZIRJE</u>                             | <b>9.3.2021</b> in <b>25.3.2021</b>  |                                 |
| <u>UNIT VELENJE</u>                             | <b>25.3.2021</b>   | <b>17.11.2022</b>               |
| <u>UNIT ŽALEC</u>                               | <b>25.3.2021</b>   | <b>19.4.2021 and 17.11.2022</b> |
| <b>CENTRE FOR SOCIAL WORK SEVERNA PRIMORSKA</b> | Letter no. 070-2/2021-31968/2<br>of <b>10.3.2021 (received on 24.3.2021)</b> |                                 |
| <u>UNIT AJDOVŠČINA</u>                          | <b>10.3.2021</b> (received on 24.3.2021)                                     | <b>17.5.2021 and 18.11.2022</b> |
| <u>UNIT IDRİJA</u>                              | <b>10.3.2021</b> (received on 24.3.2021)                                     | <b>17.5.2021 and 18.11.2022</b> |
| <u>UNIT NOVA GORICA</u>                         | <b>10.3.2021</b> (received on 24.3.2021)                                     |                                 |
| <u>UNIT TOLMIN</u>                              | <b>10.3.2021</b> (received on 24.3.2021)                                     |                                 |
| <b>CENTRE FOR SOCIAL WORK SPODNJE PODRAVJE</b>  | Letter no. sl-2/2021-1<br>of <b>8.3.2021</b>                                 |                                 |
| <u>UNIT ORMOŽ</u>                               | <b>8.3.2021</b>  |                                 |
| <u>UNIT PTUJ</u>                                | <b>8.3.2021</b>  |                                 |
| <b>CENTRE FOR SOCIAL WORK ZASAVJE</b>           | Letter no. sl-2/2021-1<br>of <b>22.3.2021</b>                                |                                 |
| <u>UNIT HRASTNIK</u>                            | <b>22.3.2021</b>   |                                 |
| <u>UNIT TRBOVLJE</u>                            | <b>22.3.2021</b>   |                                 |
| <u>UNIT ZAGORJE OB SAVI</u>                     | <b>22.3.2021</b>   | <b>18.11.2022</b>               |

TABLE 2: ACCESSIBILITY OF CSWs REGARDING SENSORY IMPAIRMENTS (1.2-5/2021)

|   | Date of the CSW's response to the Ombudsman's inquiry from 26.1.2022 | Date of CSW's response to Ombudsman's additional inquiries (if made) |
|---|--|--|
| <b>CENTRE FOR SOCIAL WORK CELJE</b>                     | Letter no. 122-69/2022-31976/4 of 7.2.2022                           |  |
| UNIT CELJE  | 7.2.2022   |  |
| UNIT LAŠKO  | 7.2.2022   |  |
| UNIT SLOVENSKE KONJICE                                  | 7.2.2022   |  |
| UNIT ŠENTJUR PRI CELJU                                  | 7.2.2022   |  |
| UNIT ŠMARJE PRI JELŠAH                                  | 7.2.2022   |  |
| <b>CENTRE FOR SOCIAL WORK DOLENJSKA IN BELA KRAJINA</b> | Letter no. 099-1/2022-31909/2 of 31.1.2022                           |  |
| UNIT ČRNOMELJ   | 31.1.2022  |  |
| UNIT METLIKA  | 31.1.2022  |  |
| UNIT NOVO MESTO   | 31.1.2022  |  |
| UNIT TREBNJE  | 31.1.2022  |  |
| <b>CENTRE FOR SOCIAL WORK GORENJSKA</b>                 |  |  |
| UNIT JESENICE   | 7.2.2022   | 28.4.2022  |
| UNIT KRANJ  | 4.2.2022   |  |
| UNIT RADOVLJICA   | 28.1.2022  | 22.4.2022  |
| UNIT ŠKOFJA LOKA  | 9.2.2022   | 25.4.2022  |
| UNIT TRŽIČ  | 3.2.2022   | 5.5.2022   |
| <b>CENTRE FOR SOCIAL WORK JUŽNA PRIMORSKA</b>           |  |  |
| UNIT IZOLA  | 3.2.2022   | 12.5.2022  |
| UNIT KOPER  | 3.2.2022   |  |
| UNIT PIRAN  | 3.2.2022   | 12.5.2022  |
| UNIT SEŽANA   | 3.2.2022   | 12.5.2022  |
| <b>CENTRE FOR SOCIAL WORK KOROŠKA</b>                   |  |  |
| UNIT DRAVOGRAD  | 17.2.2022  | 22.4.2022  |
| UNIT RADLJE OB DRAVI                                    | 1.2.2022   | 4.5.2022   |
| UNIT RAVNE NA KOROŠKEM                                  | 2.2.2022   | 4.5.2022   |
| UNIT SLOVENJ GRADEC                                     | 9.2.2022   |  |
| <b>CENTRE FOR SOCIAL WORK LJUBLJANA</b>                 | Letter no. 021-775/2022-31984/2 of 4.2.2022                          |  |
| UNIT GROSUPLJE  | 4.2.2022   |  |
| UNIT LJUBLJANA BEŽIGRAD                                 | 4.2.2022   | 5.5.2022   |
| UNIT LJUBLJANA CENTER                                   | 4.2.2022   | 5.5.2022   |

|  |  |                  |
|--|--|------------------|
| <u>UNIT LJUBLJANA MOSTE POLJE</u>                        | <b>4.2.2022</b>                                      | <b>5.5.2022</b>  |
| <u>UNIT LJUBLJANA ŠIŠKA</u>                              | <b>4.2.2022</b>                                      |                  |
| <u>UNIT LJUBLJANA VIČ RUDNIK</u>                         | <b>4.2.2022</b>                                      | <b>5.5.2022</b>  |
| <u>UNIT LOGATEC</u>                                      | <b>4.2.2022</b>                                      |                  |
| <u>UNIT VRHNIKA</u>                                      | <b>4.2.2022</b>                                      | <b>5.5.2022</b>  |
| <b>CENTRE FOR SOCIAL WORK MARIBOR</b>                    |  |                  |
| <u>UNIT LENART</u>                                       | <b>11.2.2022</b>                                     | <b>12.5.2022</b> |
| <u>UNIT MARIBOR CENTER</u>                               | <b>11.2.2022</b>                                     | <b>12.5.2022</b> |
| <u>UNIT MARIBOR TEZNO sedež</u>                          | <b>11.2.2022</b>                                     | <b>12.5.2022</b> |
| <u>UNIT PESNICA</u>                                      | <b>11.2.2022</b>                                     | <b>12.5.2022</b> |
| <u>UNIT RUŠE</u>   | <b>11.2.2022</b>                                     | <b>12.5.2022</b> |
| <u>UNIT SLOVENSKA BISTRICA</u>                           | <b>11.2.2022</b>                                     | <b>12.5.2022</b> |
| <b>CENTRE FOR SOCIAL WORK OSREDNJA SLOVENIJA - VZHOD</b> | Letter no. 070-1/2022-31860/2<br>of <b>10.2.2022</b> |                  |
| <u>UNIT DOMŽALE</u>                                      | <b>10.2.2022</b>                                     |                  |
| <u>UNIT KAMNIK</u>                                       | <b>10.2.2022</b>                                     | <b>26.4.2022</b> |
| <u>UNIT LITIJA</u>                                       | <b>10.2.2022</b>                                     |                  |
| <b>CENTRE FOR SOCIAL WORK OSREDNJA SLOVENIJA - ZAHOD</b> |  |                  |
| <u>UNIT KOČEVJE</u>                                      | <b>11.2.2022</b>                                     | <b>6.5.2022</b>  |
| <u>UNIT RIBNICA</u>                                      | <b>7.3.2022</b>                                      | <b>6.5.2022</b>  |
| <b>CENTRE FOR SOCIAL WORK POMURJE</b>                    |  |                  |
| <u>UNIT GORNJA RADGONA</u>                               | <b>31.1.2022</b>                                     |                  |
| <u>UNIT LENDAVA</u>                                      | <b>31.1.2022</b>                                     |                  |
| <u>UNIT LJUTOMER</u>                                     | <b>31.1.2022</b>                                     |                  |
| <u>UNIT MURSKA SOBOTA</u>                                | <b>31.1.2022</b>                                     |                  |
| <b>CENTRE FOR SOCIAL WORK POSAVJE</b>                    |  |                  |
| <u>UNIT BREŽICE</u>                                      | <b>8.2.2022</b>                                      |                  |
| <u>UNIT KRŠKO</u>  | <b>8.2.2022</b>                                      |                  |
| <u>UNIT SEVNICA</u>                                      | <b>8.2.2022</b>                                      |                  |
| <b>CENTRE FOR SOCIAL WORK PRIMORSKO-NOTRANJSKA</b>       | Letter no. 070-2/2020-31879/5<br>of <b>17.2.2022</b> |                  |
| <u>UNIT CERKNICA</u>                                     | <b>17.2.2022</b>                                     | <b>22.4.2022</b> |
| <u>UNIT ILIRSKA BISTRICA</u>                             | <b>17.2.2022</b>                                     | <b>22.4.2022</b> |
| <u>UNIT POSTOJNA</u>                                     | <b>17.2.2022</b>                                     |                  |
| <b>CENTRE FOR SOCIAL WORK SAVINJSKO-ŠALEŠKA</b>          | Letter no. 007-2/2022-31941/<br>of <b>1.2.2022</b>   |                  |
| <u>UNIT MOZIRJE</u>                                      | <b>1.2.2022</b>                                      |                  |
| <u>UNIT VELENJE</u>                                      | <b>1.2.2022</b>                                      |                  |
| <u>UNIT ŽALEC</u>  | <b>1.2.2022</b>                                      |                  |

|   |                  |                              |
|---|------------------|------------------------------|
| <b>CENTRE FOR SOCIAL WORK<br/>SEVERNA PRIMORSKA</b> |                  |                              |
| <u>UNIT AJDOVŠČINA</u>                              | <b>10.2.2022</b> | <b>6.5.2022</b>              |
| <u>UNIT IDRIJA</u>                                  | <b>7.2.2022</b>  | <b>6.5.2022</b>              |
| <u>UNIT NOVA GORICA</u>                             | <b>9.2.2022</b>  |                              |
| <u>UNIT TOLMIN</u>                                  | <b>3.2.2022</b>  | <b>3.5.2022 and 6.5.2022</b> |
| <b>CENTRE FOR SOCIAL WORK<br/>SPODNJE PODRAVJE</b>  |                  |                              |
| <u>UNIT ORMOŽ</u>                                   | <b>17.2.2022</b> |                              |
| <u>UNIT PTUJ</u>                                    | <b>1.2.2022</b>  |                              |
| <b>CENTRE FOR SOCIAL WORK ZASAVJE</b>               |                  |                              |
| <u>UNIT HRASTNIK</u>                                | <b>9.2.2022</b>  | <b>5.5.2022</b>              |
| <u>UNIT TRBOVLJE</u>                                | <b>9.2.2022</b>  | <b>5.5.2022</b>              |
| <u>UNIT ZAGORJE OB SAVI</u>                         | <b>9.2.2022</b>  | <b>5.5.2022</b>              |

## AN OUTLINE OF THE MOST RELEVANT NATIONAL NORMATIVE FRAMEWORK

Regarding the accessibility of centres for social work for people with disabilities or persons with sensory impairments different sources of law are relevant, primarily the Act ratifying the Convention on the Rights of Persons with Disabilities and Optional Protocol to the Convention on the Rights of Persons with Disabilities (MKPI), Protection Against Discrimination Act (ZVarD), Building Act (GZ) or Building Act (GZ-1), Equalisation of Opportunities for Persons with Disabilities Act (ZIMI), Social Assistance Act (ZSV), Act Regulating the Use of Slovene Sign Language (ZUSZJ), Accessibility of Websites and Mobile Applications Act (ZDSMA), Rules on universal construction and the use of construction works, Rules on minimum technical requirements for social assistance services providers, National guidelines to improve built environment, information and communications accessibility for people with disabilities, and Action Plan for People with Disabilities 2014–2021, adopted on 9.1.2014, or Action Plan for People with Disabilities 2022–2030, adopted by the Government of the Republic of Slovenia on 14.10.2021.

The Republic of Slovenia ratified the Convention on the Rights of Persons with Disabilities (and the Optional Protocol to the Convention) with the MKPI<sup>1</sup>. With this Convention, the contracting states committed to ensuring and promoting the **full realisation of all human rights and fundamental freedoms for all people with disabilities without any kind of discrimination due to disability** and will adopt appropriate legislative, administrative, and other measures for the implementation of rights recognised by this Convention (Article 4). In accordance with the Convention, a refusal to make necessary and appropriate changes and adjustments, **which do not impose a disproportionate or unnecessary burden**, is also discrimination due to disability, when they are needed in an individual case so that people with disabilities are provided the enjoyment or realisation of all human rights and fundamental freedoms on the same basis as others (Article 2). **In Article 3, among general principles the Convention states also the principle of accessibility.** Related to accessibility, in Paragraph 1 of Article 9 the Convention stipulates that **state parties must enable persons with disabilities to live independently and participate fully in all aspects of life.** For this purpose, they must adopt appropriate measures which will ensure people with disabilities that they have access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas.

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1. Act ratifying the Convention on the Rights of persons with Disabilities and Optional Protocol to the Convention on the Rights of Persons with Disabilities (Official Gazette of the RS – International Treaties, no. 10/08).

The purpose of the **ZIMI**<sup>2</sup> is to prevent and eliminate discrimination of persons with disabilities based on disability, while its goal is to create **equal opportunities on all areas of life** (Article 1) for people with disabilities. Paragraph 3 of Article 3 of the ZIMI stipulates that appropriate adjustment means necessary legislative, administrative, and other measures, **which do not impose an disproportionate burden**, when they are needed in an individual case so that people with disabilities are provided the enjoyment or realisation of all human rights and fundamental freedoms on the same basis as others.

In accordance with Paragraph 4 of Article 3 of the ZIMI, providing equal opportunities means planning activities which enable **the accessibility to all, primarily persons with disabilities**, of different parts of society and environment, such as **public services, the built environment, goods and services intended for the public, information, communication, etc. Any kind of discrimination due to disability in procedures before state bodies, bodies of state and self-governing local communities, contractors of public authorities, and contractors of public service is prohibited** (Article 6 of the ZIMI). In accordance with Paragraph 2 of Article 6, such discrimination is, among others, represented by **making it difficult for people with disabilities to manage the process as clients** on the side of public officials, which prevents or strongly hinders the realisation of rights of people with disabilities. Furthermore, Article 9 of the ZIMI **prohibits discrimination due to disability in accessing the use of public buildings and Paragraph 2 of the same article stipulates that adjustments of public structures and buildings be performed with construction and technical equipment, sound and light indicators, written information, and other appropriate technical adjustments**. Paragraph 2 of Article 38 of the ZIMI stipulates that the appropriate adjustment of the existing public buildings be guaranteed by **eliminating built and communication barriers from Article 9 of the mentioned act, which the investor must eliminate upon the first reconstruction of the building after the enforcement of this act, but not later than in 15 years after the enforcement of this act**. The ZIMI was put into effect in December 2010.

In Paragraph 1 of Article 4 the **ZVarD**<sup>3</sup> stipulates that **discrimination means any unjustifiable actual or legal unequal treatment, differentiation, exclusion or limitation or omission due to personal circumstances**, the goal or consequence of which is obstruction, reduction or negation of equal acknowledgement, enjoyment or realisation of human rights and fundamental freedoms, other rights, legal interests, and benefits. In Paragraph 2 of the same article, the ZVarD prohibits discrimination due to any personal circumstance. The Act explicitly includes disability among personal circumstances, based on which discrimination is prohibited.

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2. Equalisation of Opportunities for Persons with Disabilities Act (Official gazette of the RS, nos. 94/10, 50/14, and 32/17).
  3. Protection Against Discrimination Act (Official Gazette of the RS, nos. 33/16 and 21/18 – ZNOrg).

According to the **GZ**,<sup>4</sup> universal construction and use of buildings (was) is one of the essential demands for buildings (Point 7 of Paragraph 2 of Article 15). The same Act stipulated in Paragraph 2 of Article 22 that the construction and use of buildings accessible to all people regardless of their potential permanent or temporary impairment means planning, construction, and use of buildings in a manner that enables unhindered access to buildings and their use. Accesses, crossings, connecting paths, doors, and vertical connections (stairs, ramps, personal lifts, and other mechanical lifting devices) had to enable people with individual functional impairments independent use and had to be equipped with the necessary signals and equipment for uninterrupted movement, communication, and orientation. In accordance with Indent 1 of Paragraph 4 of the same article, public buildings or parts of public buildings also had to be planned, constructed, and used in the manner stipulated in Paragraph 2.

**The GZ-1<sup>5</sup>**, which entered into force on 31 December 2021, and came into use on 1 June 2022, stipulates in Article 32 the **universal construction and use of buildings. In accordance with Paragraph 3 of the same article, accesses, crossings, connecting paths, doors, and vertical connections must enable people with individual functional impairments independent use, and must be equipped with necessary signals and equipment for undisturbed movement, communication, and orientation.**

Article 2 of **the ZSV**<sup>6</sup> stipulates that the state shall provide for and develop forms of independent living for people with disabilities and prescribes in Article 4 that rights to services are claimed according to principles of equal accessibility and free choice of forms for all beneficiaries under conditions imposed by the law. Centres for social work are established as public social care institutions (Paragraph 1 of Article 49a); within the framework of a centre for social work units of the centre for social work operate which are internal organisational units (Paragraph 2 of Article 49a); social care services, public powers and duties, etc. are provided at units of a centre for social work (Paragraph 4 of Article 49a). **In accordance with Paragraph 1 of Article 93 of the ZSV, procedures of implementing services must be led in such a manner that they ensure confidentiality of information and personal integrity and dignity of a beneficiary.** The fulfilment of general conditions for the establishment of public social care and minimal technical, staff, and other conditions prescribed by the minister competent for social care is determined by the ministry competent for social care (Article 60 of the ZSV). Funds for investment maintenance and other obligations stipulated by the law and deed of establishment of a public social care institution must be provided by the founder (Paragraph 1 of Article 61 of the ZSV).

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4. Building Act (Official Gazette of the RS, nos. 61/17, 72/17 – corr., 65/20, 15/21 – ZDUOP, and 199/21 – GZ-1).

5. Building Act (Official Gazette of the RS, nos. 199/21 and 105/22 – ZZNŠPP).

6. Social Assistance Act (Official Gazette of the RS, no. 3/07 – official consolidated version, 23/07 – corr., 41/07 – corr., 61/10 – ZSVarPre, 62/10 – ZUPJS, 57/12, 39/16, 52/16 – ZPPreb-1, 15/17 – DZ, 29/17, 54/17, 21/18 – ZNOrg, 31/18 – ZOA-A, 28/19, 189/20 – ZFRO, and 196/21 – ZDOsk).

**The ZUSZJ<sup>7</sup>** stipulates **the right of deaf people to use Slovenian sign language and the right of deaf people to be informed in techniques adapted to them** as well as the scope and manner of enforcing the right to a sign language interpreter in the equal participation of deaf people in the living and working environment and all forms of social life with equal rights and conditions as well as with possibilities equal with those that people without hearing impairments have. In accordance with Article 10, a deaf person has the right to use sign language in procedures in front of state bodies, local self-governing bodies, providers of public authority or public service contractors and to be informed in techniques adapted to them in accordance with special regulations.

The **ZDSMA<sup>8</sup>** also came into use and regulates measures to **provide accessibility of websites and mobile apps of persons liable for all users, especially users with various forms of disability**. It is used for state bodies, local self-governing bodies, and public bodies according to the act regulating public procurement. In Article 5, it defines the requirements regarding accessibility of websites and mobile apps, i.e. in such a way that that information is presented to users in manners they can detect and understand. In accordance with the act that regulates public procurement, since 23 September 2020 all state bodies, local self-governing bodies, and public bodies with a few exceptions, must meet the required standards of online accessibility, and on 23 June 2021, the ZDSMA also entered into force for mobile apps.

**The Rules on universal construction and the use of construction works<sup>9</sup>** regulates in detail the essential requirement with which universal construction and the use of buildings is guaranteed, and includes the construction and use of buildings accessible to all people, and the construction of adaptable buildings. In Article 6, it defines the requirements for building interiors accessible to all people, as well as that while planning, constructing, using, and maintaining buildings accessible to all people an entrance to the building is provided in the same place or near it which is designed and equipped so that also people with visual impairments can easily find and use it. If this is not possible to achieve in buildings under reconstruction or undergoing maintenance or a change in use, a video signal must be installed at an appropriate place by the entrance which makes it possible to establish contact with an employee or a sound signal with the option of reading information. The same article further stipulates that everyone is ensured independent movement and orientation; all are ensured the use of devices enabling independent use of the building; alarm devices must be equipped with light and sound signals. In accordance with Article 8, which stipulates the requirements for spaces intended for customers, information panels, orientation signs, and other information must be easily understandable and located in a place accessible to all.

7. Act Regulating the Use of Slovene Sign Language (Official Gazette of the RS, no. 96/02).

8. Accessibility of Websites and Mobile Applications Act (Official Gazette of the RS, nos. 30/18, 95/21 – ZInfV-A and 189/21 – ZDU-1M).

9. Official Gazette of the Republic of Slovenia, no. 41/18.

**The Rules on minimum technical requirements for social assistance services providers**<sup>10</sup> determine that buildings and premises in which social care services and CSW services are provided must be accessible and designed in such a manner that they meet the psychophysical and healthcare needs of users and the execution of professional work of employees.

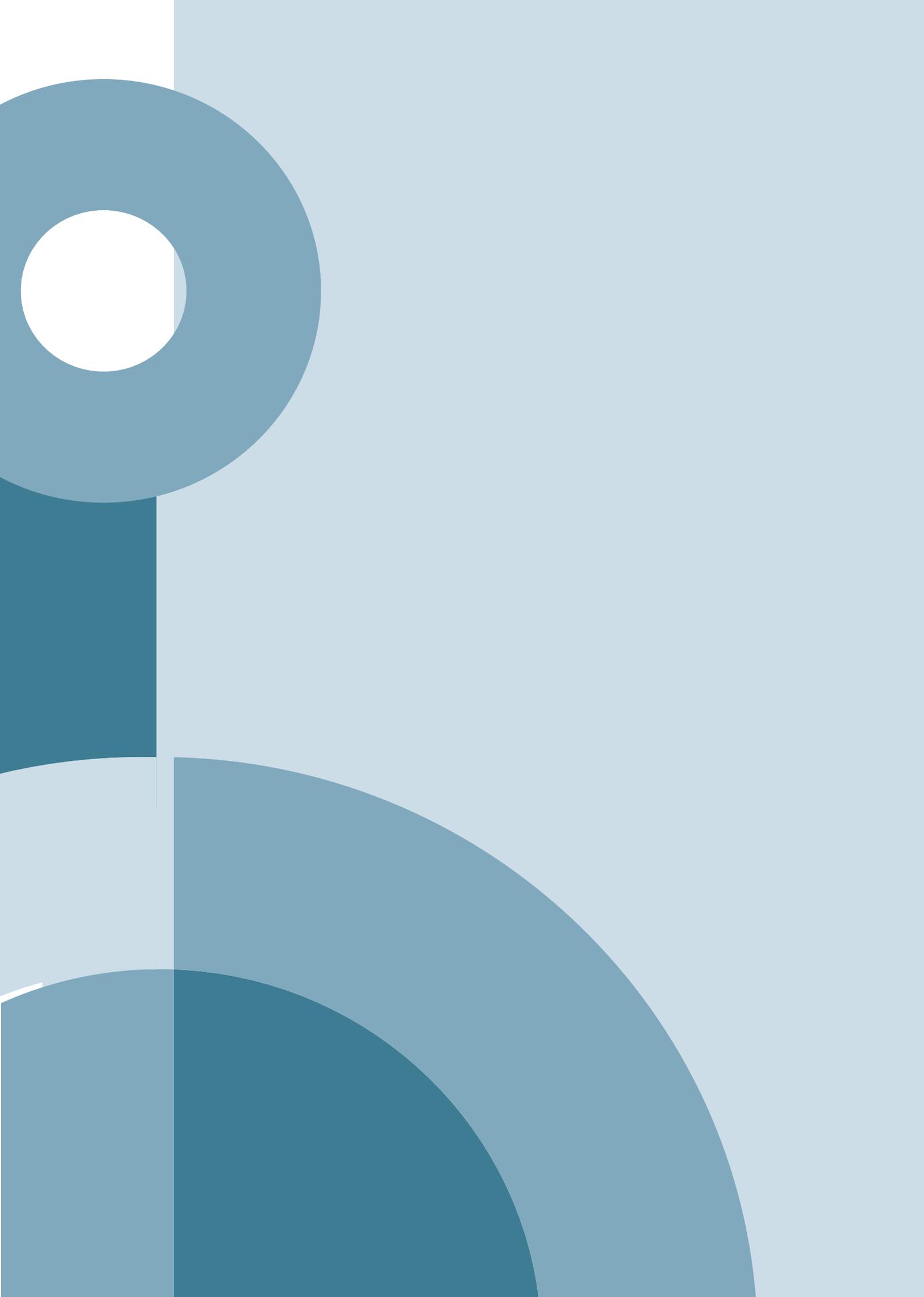
Let us also draw attention to the **National guidelines to improve built environment, information and communications accessibility for people with disabilities**<sup>11</sup>, which in **Goals I** provide for the elimination of built and communication barriers in existing public buildings. **Goals II** provides for people with sensory impairments to be ensured information in adjusted forms. Measures for blind and partially sighted people, for example, provide for the printing of more important information in bigger letters, the use of adjusted technology in services of public service, and the accessibility of an electronic magnifier or magnifying glass in public institutions. Furthermore, measures for deaf and hard-of-hearing people provide for the use of Slovenian sign language in communication, adjusted communication in public institutions, and safety equipment with vibrating alarms or a blinking light, so that deaf and hard-of-hearing people can detect messages (e.g. blinking lights indicating the direction of the exit from the building if the alarm is activated). **Goals V** include better communication of people with disabilities and other people with functional impairments in the field of e-accessibility, greater familiarisation with the possibilities provided by information communication technology to people with disabilities and other functional impairments as well as greater accessibility of information communication technologies and support technologies for people with disabilities and other functional impairments.

The **Action Programme for People with Disabilities 2022–2030**<sup>12</sup> also mentions accessibility as one of the goals. Under Point 3.3, providing accessibility to the built environment or all public buildings is explicitly stated among measures for the achievement of this goal, while under Point 3.4 ensuring accessibility to information and communication is stated.

10. Official Gazette of the Republic of Slovenia, nos. 67/06 and 135/21.

11. Official Gazette of the Republic of Slovenia, no. 113/05.

12. Available at: [https://www.gov.si/assets/ministrstva/MDDSZ/Invalidi/API-2022-2030/Akcijski\\_program\\_za\\_invalide\\_2022\\_2030.docx](https://www.gov.si/assets/ministrstva/MDDSZ/Invalidi/API-2022-2030/Akcijski_program_za_invalide_2022_2030.docx), p. 7.



Special Report  
**Accessibility of Centres for Social Work  
for People with Movement and Sensory Impairments**

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