CHAPTER 6

Dismantling Barriers to Transport by Law: the European journey

Anna Lawson and Bryan Matthews

Introduction

At the heart of the social model of disability lies the notion that people with impairments are disabled by barriers to their participation in the life of mainstream society. These barriers take many forms, emerging from sources as diverse as inaccessible architecture or design, exclusionary practices or policies and negative, hostile attitudes. The barriers which people with impairments face in accessing transport play a significant role in the disabling process. Inaccessible transport not only prevents them using transport services but also excludes them from jobs, houses, goods, services and facilities to which transport provides access.

Attempts have sometimes been made to circumvent the difficulties created by inaccessible mainstream transport systems either by providing disabled people with supplementary, specialist transport services or by providing them with goods, services and facilities in their homes. However, these approaches are expensive and segregationist. They do not break down disabling barriers so as to create a public transport system accessible to all.

In Europe the last decade has witnessed some efforts to improve access to mainstream transport. Voluntary design and service codes have been developed and have been useful in fostering support for change within the transport industry. Demonstration projects have provided evidence of the benefits of accessible transport, not only to disabled people but also to those who are 'mobility impaired' for other reasons (such as parents with pushchairs). There is, however, some impatience with the pace of change achieved by these voluntary approaches and a growing belief that the force

of the law should be harnessed to break down the barriers which prevent disabled people from using public transport.

In this chapter we provide a brief overview and critique of the current set of legal provisions relating to accessible transport throughout Europe. We begin with a brief insight into developments at the national level, illustrating the diversity of activity in the area. We then focus on two aspects of the pan-European dimension. First, we consider the extent to which European Union (EU) legislation requires Member States to make transport accessible to disabled people and the scope for further development in this regard. Second, we examine the extent to which disabled people may be able to challenge failures by their States to ensure that public transport is accessible to them as infringements of their human rights. Finally, we evaluate the different legal strategies which have emerged in the battle to remove disabling transport barriers.

Developments in Europe at the National Level

For most European countries, improved access to transport for disabled people is now a stated objective in the pursuance of which legislation is increasingly being introduced. Two recent reviews of actions at the national level have been undertaken. The first, emerging from the European Conference of Ministers of Transport (ECMT 2000), examines developments in national legislation to improve access to transport by disabled people. It divides these into two main categories: first, general laws on civil rights and non-discrimination and, second, specific regulations on access to means of transport. Within both categories there is a wide variation in the degree of action taken in different countries. In some, the implementation of legislation and regulations reflect a highly proactive policy in support of mobility-impaired people and, in others, very few measures have been introduced.

The second, a report presented to the Council of Europe (Steinmeyer 2003), is more broadly focused, covering all legislation relating to disabled people.

Table 1 illustrates the large number of national legislative and regulatory provisions in place throughout the EU, as well as the diversity within them. Policy is sometimes based at national level, sometimes at regional level and sometimes divided between the two. In some countries policy on disabled people is 'enshrined' in constitutions, whilst in others there is specific legislation regarding disabled people. Some countries, but by no means all, set out the rights of disabled people (including the right to mobility and

the right to use different modes of transport) in accordance with principles of non-discrimination or equal treatment. Enforcement mechanisms, where they do exist, also vary widely: ranging from the withholding of operating licences, to legal actions brought by the disabled person concerned, to criminal proceedings brought by the State.

Table 1: Overview of Legislative Provisions in the EU15 countries

Country	National Regulatory Texts		Standards, Guidelines, Recommendations	Enforcement and Redress Mechanisms
	General	Specific		
Austria	1 national	Specialised transport	Recommendations for architects and transport operators	Yes, law of 1994 regarding public buildings; Road Traffic Act 159:1960
Belgium	1 national 1 regional	Air transport	Trains and metros	
Denmark		Road transport; Specialised transport; Taxis and minibuses; Air transport		
Finland	Yes	Transport terminals; Road transport; Taxis; Specialised transport	Transport terminals	Sanctions
France	Yes	Transport terminals; Buses; Taxis; Road network	Infrastructures; Bus networks; Rail networks; Specialised transport; Automatic vending machines; Airports	Sanctions which could go as far as preventing operations in case of disrespect for regulations on accessibility of terminal installations

Country	National Regulatory Texts		Standards, Guidelines, Recommendations	Enforcement and Redress Mechanisms
	General	Specific		
Germany	1 national 1 regional	Train; metro Train	DIN norms; accessibility rules	
Greece	Yes	Buses; Coaches; Ferries	Buses and coaches; Airports	Checks prior to operations and once they have begun
Ireland	Yes	Taxis		
Italy	National and regional	Specialised transport		
Netherlands		Train; metro; Road transport; and specialised transport		
Portugal	Yes	Reserved places; Specially-adapted vehicles		
Spain	2 national Several for the autonomous communities	Road transport; Air transport	UNE guidelines; Rail networks; Specialised transport; Transport by bus; Taxis	Economic sanctions which could go as far as closing down the service
Sweden	Yes	Public transport; Specialised transport;	Terminals; Bus stops and bus networks	Checks prior to operations
United Kingdom	National and regional	Trains; Thorough-fares		Sanctions

Source: ECMT 2000: 7-11

Notes:

1. This Table reflects the position in 2000. There have been a number of important subsequent developments. Steinmeyer (2003) indicates, for instance, that there is now some form of anti-discrimination legislation covering access to transport by disabled people in France, Germany, Italy, the Netherlands, Spain, the UK and Poland.
2. DIN refers to German industrial standards; and
3. UNE refers to the United Nations Economic Commission for Europe.

The ECMT (2000) identify six points which deserve careful consideration by those seeking to break down the disabling barriers in this area.

> First, legislative cultures (as well as legislative provisions) in the various countries differ. Thus, differences may be found in the interpretation of similar legal provisions, in the willingness of individuals or other bodies to 'use the law' and in the attitudes adopted towards enforcement.
>
> Second, legislation alone is insufficient to ensure meaningful access to transport for disabled people. It should be supplemented by detailed regulations and guidance, including clear communication with key actors, the provision of relevant information to, and where appropriate, the training of, those concerned.
>
> Third, an appropriate balance must be struck between, on the one hand, legislation framed in such general terms that it leaves too much room for interpretation and, on the other, legislation framed in such specific terms that it becomes overly prescriptive. General legislation that provides for 'reasonable access' at 'acceptable cost' may result in change taking place relatively slowly, whereas specific legislative provisions may act as a block to the development of innovative access solutions. The ECMT favoured an approach in which clear access objectives were specified over one in which detailed technical requirements were prescribed.
>
> Fourth, broad support for proposed legislation should be secured from relevant industries and other affected groups. Whilst laws might be enacted, their provisions can be blocked by technical

or other obstacles if the will to implement them is missing. The ECMT cited experience in the USA from the 1970s and 1980s as demonstrating that actual litigation is often the least cost-effective means of achieving change.

Fifth, effective enforcement mechanisms must be established. While this will be relatively straightforward in the case of specific regulations or design standards, it may be more complicated, time-consuming and costly in the case of more general anti-discrimination or civil rights provisions. A mix of incentives and penalties, perhaps including linking financial aid (for example, subsidies to bus operators) to meet legal requirements, can be used to promote compliance.

Finally, the ECMT recommended that procedures be set up for reviewing the effectiveness of the legislation, both in terms of its contribution to meeting national objectives and in terms of how it compares with practice in other countries.

EU Legislation

There is currently no general EU legislation requiring Member States to prohibit discrimination against disabled people in relation to transport. In relation to employment, however, the Employment Framework Directive 2000 requires Member States to take steps to prohibit discrimination against people on a number of protected grounds, including disability. This contrasts with the situation regarding race discrimination, where the Race Directive 2000 prohibits discrimination on racial grounds both in the context of employment and in the provision of goods and services (including transport).

Despite the lack of comprehensive legislation requiring States to eliminate disability discrimination in transport, there are a number of narrowly drawn EU provisions designed to improve access to specific modes of transport. The Bus and Coach Directive 2001, for instance, requires Member States to ensure that urban buses comply with various accessibility standards. They must, for example, be fitted with a ramp or a lift as well as a kneeling system and must have wheelchair designated spaces, colour contrasting, and designated seats for persons with reduced mobility. The more recent Road Safety and Motor Vehicles Directive 2003 will require all new buses and coaches to comply with harmonised construction standards, including basic accessibility features for disabled passengers.

In relation to rail, the High Speed Trains Directive 1996 requires rolling stock and rail infrastructure to be constructed so as to facilitate access by disabled passengers. Similar requirements are now being developed for the conventional rail system. The European Commission has also proposed, as part of its plans for the development of an integrated rail system, that rail operators be encouraged to develop a voluntary charter on service quality which would include issues relevant to disabled people (European Commission 2002a).

Two directives currently have particular relevance to disabled passengers travelling on ships but their effect is very limited (Information on Disabled Passengers Directive 1998 and Accessible Information Directive 1999). There are currently moves to introduce a directive designed to implement the recommendations of the International Maritime Organisation on the design and operation of passenger ships (Draft Passenger Ships Directive). This would require ships to be constructed so as to allow disabled people to move between the main deck and the below-deck areas and would require alarm systems to be made accessible to disabled people, including those with sensory or cognitive impairments.

In relation to air travel, there are currently no EU imposed obligations to ensure accessibility. There is, however, a voluntary code drawn up jointly by the European Commission and the European Civil Aviation Conference (ECAC 2001) and implemented in 2002. Under it, signatory airlines undertake to allow disabled people to travel (except where this would not be safe or where they could not physically be accommodated), and not to pass the costs of disability-related assistance or services on to the disabled person. Signatory airports undertake to ensure that their infrastructure is accessible. The European Commission has proposed legislation to make some of these undertakings mandatory (European Commission 2002b, 2003). This was welcomed by the European Disability Forum (EDF) which has campaigned for the proposed rights to be strengthened and extended (EDF 2001, 2002).

The existing patchwork of directives on accessible transport, then, does not require Member States to implement clear, comprehensive non-discrimination measures. The focus is largely on issues of design and construction: a tendency echoed elsewhere in European policies relating to disability and transport (European Commission 1993, 2000). Aircraft have to date escaped even this form of regulation. Accessible design is clearly fundamental to the existence of a system capable of being used by all. Alone, however, it is clearly not enough. The provision of

accessible information and appropriate assistance, for instance, will also be essential.

The EDF has drawn up a shadow Disability Directive which would oblige member States to take steps to prohibit disability discrimination in the provision of goods and services generally. It would require the introduction of measures designed to ensure that:

> All forms of public transport and all buildings and structures providing access to public transport, whether provided by the public or private sector, are accessible to persons with disabilities. Member States shall require that all new and, wherever possible, refitted transportation vehicles and buildings are accessible and shall set appropriate deadlines for providers of public transport with regard to achieving accessibility for existing vehicles, buildings and structures (Article 5 (2) (a)).

Thus, issues of design and construction would be covered but this directive would extend much further (Articles 2(6), 3(1) and 4). It would require all forms of public transport to be accessible to disabled people; demanding, not only that vehicles and buildings be designed appropriately, but also that information be made accessible and that reasonable accommodations be provided.

The European Commission's planned programme of work in the area of transport for this decade is set out in its White Paper *European transport policy for 2010: time to decide (European Commission 2001)*. This document contains disappointingly little of specific relevance to disabled people. Nevertheless, the relevant European Commissioner has indicated some support for the adoption of a disability-specific directive along the lines of that proposed by the EDF (Diamantopoulou 2003) but the Commission itself has, to date, remained silent. Were such a directive to be adopted, Member States would be forced to dismantle many of the disabling barriers to transport currently confronting people with impairments. For some, this would be a novel exercise. For others, which have already taken some legislative action, it would represent an obligation to reassess (and typically strengthen) that legislation. Until it is adopted, the EU legislation on accessible transport will remain patchy and incomplete.

Human Rights

The European Convention on Human Rights (ECHR)

Notwithstanding the absence of any relevant domestic anti-discrimination

law, disabled people faced with inaccessible public transport systems may be able to challenge their consequent exclusion or discomfort as an infringement of their rights under the ECHR. It has been suggested, for instance, that a public transport system requiring disabled people to travel in humiliating and undignified conditions might constitute a breach of their Article 3 right to be free from inhuman and degrading treatment (Nowak and Suntinger 1995: 119). No such challenge has yet been mounted, and success would be by no means guaranteed. The judiciary are traditionally extremely reluctant to find breaches of this Article, to which there are no qualifications or defences. This is illustrated by a recent British case, Bernard v Enfield LBC (2002), in which Article 3 was found not to have been breached even though a disabled woman had had to live for over twenty months in 'deplorable conditions' because her local Council failed to provide her with an accessible home.

Though the Article 5 right to liberty and security might seem to offer another means of challenging inaccessible transport systems, again no such case has been made and there are currently no indications that Article 5 will be developed in this way (Clements and Read 2003: ch 4). Protocol 4, which guarantees freedom of movement, provides another possible basis for inaccessible transport cases, although its potential is currently untested.

The most obvious article on which to found an inaccessible transport claim is Article 8. Though this has not yet occurred, the well-known case of Botta v Italy (1998) has obvious relevance. It is particularly interesting because it raised the question of the extent to which states should act to ensure respect for private and family life by taking positive steps to break down the social, architectural or other barriers faced by disabled people. Mr Botta, a wheelchair-user, claimed that the state's failure to enforce laws requiring private beaches in Italy to be made accessible to disabled people infringed his Article 8 right to a private life (which has been interpreted broadly to include a right to physical and psychological integrity and to the development of one's personality in one's relations with others). He argued that, in being prevented from using the beaches, he was denied a 'normal social life' and the ability 'to participate in the life of the community' (para 27). The parallels with a case in which a disabled person is unable to travel because of an inaccessible transport system are obvious.

Though Mr Botta lost his case, the reasoning of the European Court of Human Rights (ECtHR) does hold out some hope for disabled people wishing to challenge transport barriers. The Court accepted that respect for private life would sometimes require States to adopt positive measures.

More specifically, provided there was no relevant defence under Article 8, they would be required to adopt such measures where there was a 'direct and immediate link between the measures sought by an applicant and the latter's private and/or family life' (para 34). There was, however, no such direct and immediate link in Botta – the right to access beaches in a holiday destination involving 'interpersonal relations of such broad and indeterminate scope that there [could] be no conceivable direct link' (para 55).

The question, then, is how severe must the consequences of inaccessible transport be for an individual in order to establish the necessary direct and immediate link? Will it be established if the individual is unable to travel to local shops or other amenities? Will it be established if they are able to travel around their locality only at considerable risk to their safety – for example, where they would have to use pathways shared with cyclists or where bus stops or other facilities could be reached only by crossing busy roads with no audible or tactile crossings? Will the consequences of inability to use public transport ever be sufficiently severe to establish the necessary link? The post-Botta cases, though not directly concerning transport, are not encouraging.

In Zehlanova and Zehnal v the Czech Republic (2002), for instance, the link was not established by disabled people who were unable to access various buildings in their home town due to architectural barriers. Despite the fact that these buildings included the post office, the swimming pool and various medical facilities, the ECtHR was not convinced that they played a sufficient role in the everyday lives of the disabled people concerned. In Marzari v Italy (1999) and in Sentges v the Netherlands (2003), however, the ECtHR was prepared to contemplate that the required link had been established by claims for, respectively, appropriate housing and a robotic arm (which would have facilitated daily tasks such as eating and drinking). Nevertheless, both these cases failed on the grounds that requiring the State to comply with the requests of the disabled applicants would have been disproportionate and failed to accord sufficient respect to decisions about how finite resources should be allocated.

Olivier De Schutter (2003) has argued that these cases reveal reluctance on the part of the ECtHR to find that a direct and immediate link exists unless the obstacles in question relate to the immediate environment of the disabled litigant and have an effect on their everyday life which is 'permanent and important' as opposed to 'occasional or negligible'. In

Botta and Zehlanova, the two cases in which there was found to be no link, the quality of 'permanence' was missing. This does not bode well for claims based on the inaccessibility of public transport, at least where alternatives (for example, in the form of private or specialised transport) are available. Even if the direct and immediate link requirement could be satisfied, Marzari and Sentges suggest that litigants in such claims would struggle to show that it would have been a proportionate response for a State, which had offered to provide specialised, segregated services, to have made public transport accessible instead. Thus, in the context of access to transport, Article 8 might offer some prospect of success to a disabled claimant unable to access public transport to whom no alternatives were available. Such a claim, however, would seem likely to result in a State being required to provide some alternative means of transport to the particular person concerned rather than to remove the more general disabling barriers from its public transport system.

The Article 14 right to be free from discrimination in the enjoyment of one's Convention rights may also be relevant in this context. Two issues are likely to be of particular significance for disabled 'travellers' seeking to rely on this Article:

First, the alleged discrimination must affect the enjoyment of a Convention right. Thus, a claim that a State's failure to take positive steps under Article 8 to break down disabling barriers would require the existence of a direct and immediate link of the type outlined above. In the absence of any such link, an Article 14 argument will fail as it did in Botta.

Second, it would have to be shown that failing to make transport accessible to disabled people amounted to discrimination against them. Such failures are extremely unlikely to amount to direct discrimination. Concepts of indirect discrimination, however, have been slow to emerge from the Article 14 cases (McColgan 2003: 168-170) and it is still by no means certain that Article 14 will be interpreted so as to require reasonable adjustments to be made in favour of disabled people. Thlimmenos v Greece (2000) however, does provide some grounds for optimism. There, the ECtHR held that Article 14 had been breached by a state's unjustified failure (in the context of religion) to treat differently persons whose circumstances were materially different. This suggests that the failure to make relevant adjustments for disabled travellers (for example, providing them with staff assistance) may amount to discrimination for these purposes.

Disabled people, then, may attempt to use the ECHR to challenge

inaccessible transport systems. Though Articles 8 and 14 both afford some hope, success would be by no means guaranteed. Even if the required 'direct and immediate link' could be established, both articles are qualified and states may well be able to argue that their policies were justified, most probably on grounds of cost. Even in the unlikely event of success, the result may well be the provision to that person of a specialised, segregated alternative means of transport rather than the wholesale dismantling of barriers to their use of public transport.

The Revised European Social Charter (ESC)

Article 15 of the revised ESC, adopted by the Committee of Ministers in April 1996, confers on disabled people a right to 'independence, social integration and participation in the life of the community'. By Article 15(3) the signatories undertake to:

> promote their full social integration and participation in the life of the community, in particular through measures, including technical aids, aiming to overcome barriers to communication and mobility and enabling access to transport, housing, cultural activities and leisure.

In Botta (para 28), the Commission on Human Rights indicated that 'the social nature' of the right to access beaches meant that it was more appropriately protected by machinery such as that provided by Article 15 of the ESC than by that of the ECHR. This observation was not expressly echoed by the ECtHR, although it did rule that the right fell outside the reach of the ECHR. The protection provided by Article 15 is, however, limited in the extreme - even for those disabled people living in countries which (unlike the UK) have signed up to the revised ESC.

The ESC imposes obligations on signatories to report on their progress in the implementation of the rights it confers. There is, however, little sanction for states who fail to comply. Since 1 July 1998, the collective complaints procedure may also be used to 'enforce' Article 15. Though this may result in a recommendation by the Council of Ministers that the offending state should bring its policies into line with the requirements of the ESC, there is again no sanction for non-compliance. There is currently no mechanism for individual enforcement of Charter rights (Novitz 2002).

Legal Strategies for Change: A Social Model Perspective

It is interesting to evaluate the different legal strategies which have emerged in the context of disability and transport against the backdrop of

the social model of disability. The social model focuses on the societal barriers which prevent people with impairments taking part in the mainstream life of their communities. It is therefore useful to consider the extent to which the different legal strategies will actually result in breaking down the disabling barriers which exist in public transport.

In the previous section we drew attention to the limited potential of European human rights legislation as a means of achieving far-reaching change in the provision of public transport. A claim under the ECHR may have some small chance of success but the outcome of that success would almost certainly not be to require States to break down the barriers to mainstream public transport which make it unusable by people with impairments. The provision of supplementary, segregated forms of transport would probably suffice. The outcome of an ESC claim is similarly uncertain and suffers from the further disadvantage of inadequate enforcement mechanisms.

Laws which require transport vehicles and infrastructure to be designed so as to maximise access, as are required by many of the current EU directives relating to disability and transport, have an obvious role to play in breaking-down some of the disabling barriers in the transport system. As mentioned above, however, such laws do not go far enough. Accessible vehicles will remain inaccessible to many disabled people (particularly those wishing to travel alone) if staff are permitted to deny entry to disabled people or simply to refuse to provide them with assistance or accessible information.

Anti-discrimination legislation has the potential to cover a wide spectrum of the barriers traditionally encountered by disabled people in accessing public transport. Yet, in many EU countries, comprehensive protection in the area of transport has not emerged even where more comprehensive protection has been afforded in other fields. In the UK, for instance, though the Disability Discrimination Act 1995 (DDA) made it unlawful for providers of transport to the public to discriminate against disabled people in accessing transport infrastructure (such as train stations and bus stops) and included various technical design standards for transport vehicles, the provision of transport services was excluded. There are, however, plans to remove this exclusion by the draft Disability Discrimination Bill 2003. It should also be noted that the EDF's shadow disability directive would require Member States to introduce anti-discrimination legislation which has a comprehensive coverage of transport.

Anti-discrimination legislation, even if comprehensive, is unlikely to prove an effective tool for the systematic breaking down of disabling barriers to transport if it relies entirely on enforcement by individual litigants. In such a system, the nature of the cases brought would inevitably be somewhat of a lottery: dependent on the type of barrier encountered by disabled travellers willing and able to endure the burden of legal proceedings. More strategic enforcement would be possible only through the work of some kind of enforcement body (such as the UK Disability Rights Commission) with a remit to support and fund individuals in cases likely to clarify or develop the law (O'Brien 2003).

Even an anti-discrimination law covering transport and supported by some kind of enforcement body may often have serious limitations as an instrument of social change. The focus is often on compensating successful individual litigants who have been discriminated against in the past rather than on changing practices and policies so as to avoid discrimination in the future (Fredman 2001a: 170-173). The prospects for social change are improved where the duties placed on service providers are of an anticipatory nature, as is the case in the UK with the duties to make reasonable adjustments under the DDA. Nevertheless, judgements have still tended to focus on compensation, rather than requiring change, where service providers have been found not to have fulfilled their anticipatory duties. If there is no obligation to consult with and involve disabled people in the design of structures, policies and systems it will inevitably prove difficult to tackle those barriers which arise from neglect or lack of understanding of their needs and frequently permeate every layer of an institution's operation (Hepple et al. 2000: para 2.19).

Some of the limitations outlined in the previous paragraph could be removed by the inclusion in anti-discrimination laws of a positive duty to promote disability equality along the lines of the UK positive duty to promote good relations between members of different ethnic groups and eliminate race discrimination created by section 71 of the Race Relations (Amendment) Act 2000. Such a duty would require organisations to consider disability equality at every stage of their design and operation. Unlike conventional forms of anti-discrimination legislation, it would require employers and service-providers to take positive steps to ensure that, wherever possible, disabling barriers were removed and, perhaps more significantly, not created at the outset. There are proposals to impose such a duty on public bodies in the UK in the draft Disability Discrimination Bill. Provided such a duty is supported by effective enforcement

mechanisms, it has enormous potential to dismantle disabling barriers in the sphere of public transport and beyond (Fredman 2001b; O'Cinneide 2003). In this sense it is a legal strategy very much in line with the tenets of the social model (Oliver 1996; Quinn 1997).

Conclusion

Recent years have witnessed a significant increase in the legal requirements imposed on the transport industry in European countries to provide transport which is accessible to disabled people. Despite the apparent growth in commitment to achieving change in this area, the overall picture of legislative provision remains something of a patchwork. The national level is characterised by a wide variety of different approaches and different levels of activity. At the EU level there is a patchy coverage of transport modes (air travel remaining largely uncovered) and a patchy coverage of access issues with physical access often dominating concerns while information and customer service issues are neglected. European human rights instruments provide a possible, though somewhat uncertain, avenue of redress to disabled people in signatory States.

We have explored a number of the legal strategies which have emerged to assist disabled people wishing to challenge the inaccessibility of their public transport systems. While the human rights route may offer some redress to claimants in the most extreme of circumstances it is unlikely to lead to a general dismantling of disabling transport barriers. Traditional anti-discrimination legislation, too, is likely to have only a limited effect on the general elimination of such obstacles. The appearance of a new positive duty to promote disability equality, coupled with the duty not to discriminate, promises a more anticipatory, systematic approach to the development of a barrier-free transport system. It is to be hoped therefore, that the EU can be persuaded to adopt a disability-specific directive, such as that proposed by the EDF, and that it will include an obligation on States to impose a positive duty on public bodies to promote disability equality in the provision of transport and other services.

Law alone, however, must not be expected to achieve wholesale social change. As the ECMT stress, even the best of laws must be supplemented by clear guidance, communication, persuasion and training. Much work remains to be done both in securing appropriate legislation and in ensuring its effective implementation. Though we may have begun to make preparations for our journey towards a Europe with public transport systems accessible to disabled people, the journey itself has scarcely begun.

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