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BÁNÁSMÓD HATÓSÁG

Egyenlő Bánásmód Hatóság
Equal Treatment Authority

Report 2018

Report

on the activity of the Equal Treatment Authority in 2018 and on the experiences gathered in the context of applying Act CXXV of 2003 on Equal Treatment and the Promotion of Equal Opportunities

Budapest

2019

Report on ton the activity of the Equal Treatment Authority in 2018 and on the experiences gathered in the context of applying Act CXXV of 2003 on Equal Treatment and the Promotion of Equal Opportunities

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Introduction

Dear Reader,

The report of the Equal Treatment Authority (abbreviated as EBH in Hungarian, hereinafter referred to as the Authority) about its activities in the year 2018 will provide you with a comprehensive picture of our recent work and we sincerely hope that you will find the information herein useful.

We began the year by releasing and publicly distributing the first four volumes of our series of thematic EBH Booklets in print, along with the results of the representative survey research on the public's legal awareness of equal treatment.

Nevertheless, the lion's share of our work continues to be the application of the law, that is the investigation of discrimination complaints. At the same time we also place a great emphasis on the public promotion of our network of equal treatment consultants and thereby on improving the public's access to the law and to legal remedies.

The Authority's legal staff handled almost 1,000 complaints in 2018 and the EBH rendered 315 public administration decisions.

We found sanctionable infringements of the principle of equal treatment in 36 cases. In 80 cases we had to render a decision that rejected the underlying individual or public interest petition, and in another 30 cases we approved settlements concluded by the parties.

In the interest of improved transparency, we present the statistical data on the Authority's activities in the form of infographics and we will also present in greater detail those of the Authority's decisions that became final and binding last year and which we believe are of interest to the public.

I would like to express my gratitude to the Authority's committed staff for all their dedicated work throughout the last year and I would like to especially thank the 16 legal experts outside Budapest who make up our national network of equal treatment consultants for their immense contributions over the past years. They have performed amazing work in the ten years since the network was created!

It is my hope that the general public, the Members of Parliament and any interested party will find our report on the Authority's public administration and communication activities a useful and interesting reading.

Dr Ágnes Honecz

About the Authority

The Equal Treatment Authority (Egyenlő Bánásmód Hatóság (EBH), hereinafter referred to as the Authority or the EBH) is responsible for monitoring the implementation of the principle of equal treatment, and its jurisdiction extends across Hungary. The Authority is an independent and autonomous administrative body. Its responsibilities must be set out in law. It is not subject to instructions concerning its functions, and it discharges its responsibilities separately from other bodies and free of outside influence. The President of the Equal Treatment Authority is nominated by the Prime Minister and appointed by the President of the Republic for a term of nine years.

The Authority's primary responsibility is to investigate complaints and reports filed concerning cases involving alleged discrimination. The Authority conducts its investigations based on the rules of public administration procedures, and its work is helped by a nationwide network of equal treatment consultants. In addition to its application of the law, the Authority also pursues the objective of preventing and recognising discriminative conduct and fostering the spread of non-discriminatory attitudes through specialised publications, programmes and informational publications.

The legal framework for the activities of the Equal Treatment Authority is set out in Act CXXV of 2003 on Equal Treatment and the Promotion of Equal Opportunities (hereinafter referred to as the Ebktv pursuant to the Hungarian abbreviation).

Discrimination

Discrimination is a violation of the principle of equal treatment. According to the Ebktv, the principle of equal treatment is violated – in other words discrimination occurs – when an individual or a group of individuals are subjected to a disadvantage because of a protected characteristic he/she/they possess. Protected characteristics are the characteristics and personal features enumerated in the Ebktv which may not be used as a ground for adverse differential treatment, for that would constitute a violation of the principle of equal treatment, in other words discrimination.

The protected characteristics listed in the Ebktv are the following:

- gender
- racial origin
- skin colour
- nationality

- belonging to a national or ethnic minority
- mother tongue
- disability
- health condition
- religion and belief
- political or other opinion
- family status
- motherhood (pregnancy) or fatherhood
- sexual orientation
- gender identity
- age
- social origins
- financial status
- limited term or part time employment or other form of work contract
- membership in a trade union
- other situation, characteristic or attributes

The Ebktv tends to extend protections to innate characteristics that are either permanent, immutable or difficult to change. In line with international practice, protected characteristics refer to essential features of a person's character that lend themselves to group formation and may give rise to prejudice. At the same time, however, the enumeration of characteristics in the law is not a closed list; the last line in the list refers to „other situation, characteristic or feature" (Section 8 (t) of the Ebktv). Nevertheless, this does not imply that the law regards the differential treatment and harassment of any and all persons or groups based on any type of characteristic as discrimination. The provision concerning „other situation, characteristic or feature" must to be construed more narrowly; only characteristics and situations that are essentially similar to those enumerated in the law can be construed as protected characteristics.

Discrimination may be realised in the forms of direct discrimination, indirect discrimination, harassment, unlawful segregation and victimisation.

The current publication provides information on the activities of the EBH in 2017. Further detailed information about the EBH and its procedure is available on the Authority's website (egyenlobanasmod.hu).

The Equal Treatment Authority in 2018

64 complaints through the equal treatment consultants,
the network recorded a further 1576 contacts

786 written submissions

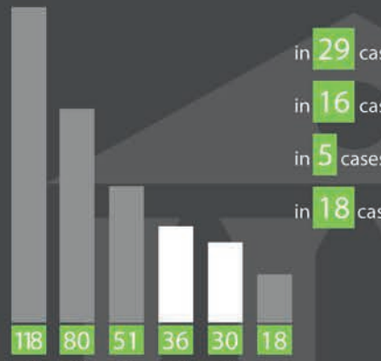
135 cases from 2018

921 submissions

315 administrative decisions

158 case in progress

448 letters of infromation



in 29 cases barred from future infringement

in 16 cases publication of the decision

in 5 cases order to cease the infringement

in 18 cases fine

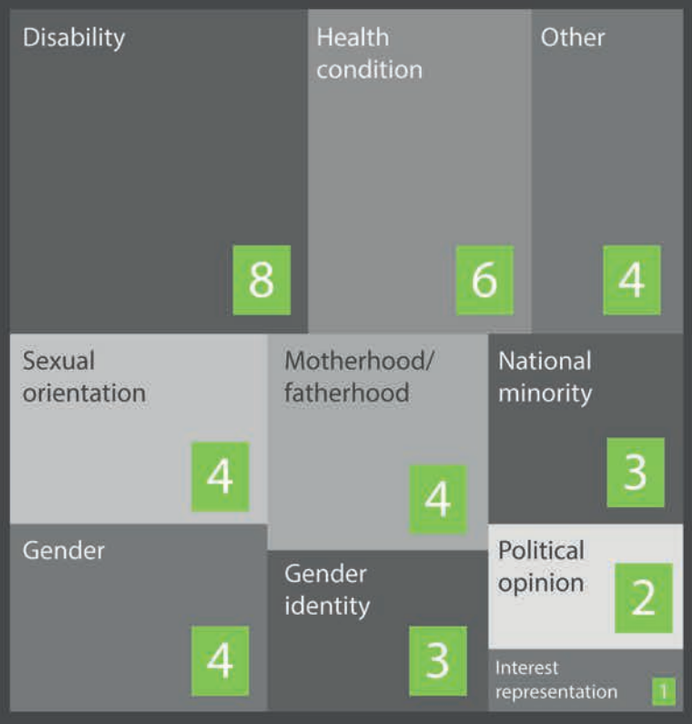
6 100 000 HUF

total fine

77 hearings

Main areas of discrimination

Protected characteristics



Cases

Employment

The cavalier strikes back
EBH/168/2018 - case concluded with a settlement

The petitioner was a young female university graduate who had been working for years as a civil servant at the institution complained against when she found herself confronted with the situation that her immediate superior sought to initiate romantic relations with her. He gave her flowers, wrote emails in which he professed his love for her, and on one occasion he showed up at her flat offering to take her to work by car. He also told her that he had arranged for her to receive an indefinite appointment to her position. The petitioner consistently refused his advances. After several weeks of failed attempts, the superior informed the petitioner that her appointment would no longer be renewed, that is she would not only not receive an indefinite appointment but would in fact not even be given another fixed-term appointment once her contract expired. When the petitioner sought information about this from the manager in charge of the organisational unit where she was employed, she was informed that the reason for the decision not to renew her appointment was that her superior no longer wanted to work with her. (The superior had the right of recommendation with regard to her continued employment). That was when she informed her director about what had transpired between her superior and herself; the director heard her out but took no action whatsoever. Subsequently, her immediate superior and her co-workers began to treat her with hostility, and an uncomfortable and degrading environment emerged for her at work. The petitioner's assessment was that by failing to take action against the behaviour exhibited by her superior and her colleagues, as well as by failing to renew her fixed-term appointment, the employer had violated the principle of equal treatment in connection with her female gender.

The Authority held a hearing in the case and heard the petitioner's immediate superior as a witness. At the hearing, the superior offered an apology to the petitioner in the event that his words or emails had offended or had made her uncomfortable. Having regard to the apology, the petitioner concluded a settlement with the employer, and as part of the settlement the fact that the apology had taken place was also laid down in writing. In the settlement, the employer pledged to ensure that a representative of the Authority would be invited hold a presentation for senior staff at the institution to discuss the pertinent legal regulations

concerning the principle of equal treatment and the Authority's application of the law, with special regard to the cases involving employment. The petitioner considered the case concluded. The Authority approved the settlement in a decision and then arranged for the aforementioned presentation, in which a senior representative of the Authority highlighted that it is incumbent on an employer to protect its employees from workplace harassment. The presentation also discussed the appropriate practices to be followed by employers (e.g. designing a proper complaint management mechanism).

"When someone is sick during the probation period, they tend to get fired"
EBH/174/2018 - decision finding an infringement

In several of the petitions received by the Authority this year employees complained that their employer had terminated their employment during the probation period in connection with some protected characteristics (most typically a health condition or pregnancy). Although the labour law regulations provide that during the probation period an employment contract may be terminated without the employer having to proffer any specific grounds for the termination, in the Authority's procedure it is incumbent on the employer (since pursuant to Act CXXV of 2003 on equal treatment and the promotion of equal opportunities, hereinafter referred to as the Ebktv following the Hungarian abbreviation, the burden of proof lies with the subject of the procedure) to show that the termination did not owe to the employee's protected characteristics but to other reasons.

One of the petitioners who had filed a complaint in such a case had been employed in a position that required her to work three different shifts and also involved assignments that required her to move heavy objects around. After working three weeks on the job, the employee informed the employer that she would not be able to come in to work for the night shift due to ill-health and that her doctor had placed her on sick leave. After being on sick pay for a week, the petitioner came to the company's premises to announce that she was pregnant. Upon arrival, however, she was welcomed by the employer's representative who said that her employment was being terminated with immediate effect during the probation period because she had not showed up at work at the required times. The petitioner then stated that she had announced that she was ill over the phone and specifically named the person whom she had informed about this. The petitioner submitted that the employer acknowledged this but nevertheless declared that it would terminate her employment because that is customary at the company when it comes to employees who go on sick leave.

The employer argued in the proceedings that it had formed a negative impression of the petitioner during the short time that she had worked there. She complained already during the first week to her immediate superior that she disliked the work, she thought it dirty and difficult, and she was not used to that. The employer also submitted that both her manager and co-workers agreed that she did not have the right attitude towards the job, she was not diligent and could not be counted upon, she proved unreliable. She was only on her fifth day when she failed to show up at work and retroactively asked for a day of vacation, which she had not even been entitled to at that time in proportion to her total time on the job. The employer explained that during the probation period employees tend to strive to present themselves in the best possible light – if they want to keep their job, that is. They follow the rules and try to perform their assignments in a way that seeks to inspire lasting confidence in the employer. That was not how the petitioner proceeded, however, and she also failed to verify her inability to work in compliance with the requirements set out in her employment contract.

The Authority held a hearing in the case where it also heard witnesses in addition to the parties' statements.

The Authority examined whether the employer had been able to persuasively show that it had complied with the principle of equal treatment in its treatment of the petitioner, and it also examined whether there was a causal relationship between the petitioner's health condition (her being on sick leave and receiving sick pay) and the termination of her employment.

The employer did not dispute that the petitioner had announced her intention to go on sick pay, and the warehouse manager who was heard as a witness also confirmed this.

The Authority did not accept the employer's defence that there were problems with the petitioner's work performance because the documents it submitted failed to substantiate the claim. Based on the written performance reviews, it was possible to determine that the performance of those co-workers who were in a comparable position with the petitioner was nearly the same as that of the petitioner, in fact some the petitioner's colleagues had performed less well than the petitioner and had nevertheless not been laid off.

Nor did the Authority accept the employer's defence that the petitioner's attitude towards her work left something to be desired since the warehouse manager stated that the petitioner had worked properly and that he did not think that her comment that the work she had to do was hard and dirty – which was incidentally a fact – was a complaint since in fact she had been charged with cleaning crates.

With respect to the employer's reference to the petitioner's absences, the Authority also considered that there were co-workers of the petitioner who had been absent twice during the probation period and nevertheless did not see their employment relationship terminated. The petitioner, by contrast, had always indicated the reason for her absence.

The employer's social security administrator, who was examined as a witness, stated that the employer looks askance at employees going on sick pay during the probation period, and the employees who get sick during the probation period tend to get laid off. Although the witness stressed that this was only a personal impression, these comments nevertheless supported the assumption that the petitioner's employment had been terminated because she became ill and went on sick pay, especially so since this assessment was proffered by someone who worked in a position which gave them an overview of the employer's practices in such situations.

The Authority held that the employer had directly discriminated against the petitioner in connection with her health condition (her being on sick pay) and had violated the principle of equal treatment when it terminated the petitioner's employment while she was on sick leave. In its decision, the Authority banned the employer from future conduct of this kind, ordered the publication of its decision for a period of 30 days and also imposed a fine of 1,000,000 forints on the employer.

An administrative job - but only for young women
EBH/291/2018 - decision finding an infringement

A male petitioner turned to the Authority with the complaint that a school cooperative had advertised a vacancy notice for a position as an administrator on the page of the cooperative's Facebook group. The notice was aimed exclusively at young women. In a comment below the post with the vacancy notice, the petitioner said that he had time and was interested in the work, also asking why young men were ineligible to apply. The school cooperative failed to respond.

The Authority launched proceedings against the school cooperative based on the petition. In the course of the hearings it also heard the school cooperative's coordinator as a witness.

The school cooperative invoked that the petitioner did not have any type of legal relationship with the cooperative that was aimed at the performance of work, and hence based on the Ebktv's Section 5 (d) – in the absence of such a legal relationship –, the cooperative had not been obliged to comply with the principle of equal treatment in its treatment of the petitioner. The Authority rejected this reasoning because Section 21 of the Ebktv extends the obligation to comply with the principle of equal treatment to any conduct on the part of the employer even before the parties have entered into an actual agreement involving employment or any other legal relationship (such as, for example, a selection procedure preceding an employment, vacancy notices, the specification of job requirements, etc.).

Ultimately, a woman was hired who had also submitted her application through the previously mentioned closed Facebook group. Thus, the petitioner was in a comparable position with her. The vacancy notice was unequivocally discriminative since it was only addressed at women. The school cooperative argued that it had decided not to select the petitioner for the position because he was only a regular member of the school cooperative and he did not have an existing agreement in place with the cooperative that would have allowed him to perform the work that had to be done the next day. The Authority rejected this argument, however, because the school cooperative – even though it bore the burden of proof – had failed to show that the female applicant who was ultimately given the position did in fact have such an agreement with the employer at the time of her application.

The Authority held that the school cooperative had violated the principle of equal treatment in connection with the petitioner's male gender, and that the violation took the form of direct discrimination since it had been possible to ascertain that

the petitioner's gender played a role in the decision not to hire him for the advertised position.

As a sanction the Authority banned the school cooperative from future conduct of this kind, and at the same time it also ordered the publication of its decision for a period of 30 days and imposed a fine of 100,000 Hungarian forints against the cooperative. By publishing the decision on its website, the Authority wanted to raise awareness about the fact that men and women have to be accorded equal opportunities to gain an employment in any situation when the character and the nature of the work in question do not justify distinctions based on gender.

Services

With a stoma bag at the spa
EBH/95/2018 - decision finding an infringement

The petitioner has been living with a colostomy (stoma) for years now, which is why he wears a stoma bag. He visited a spa with his partner and they both entered the pool at the spa. Although the petitioner wore a white T-shirt in the pool, the stoma device was nevertheless somewhat visible. After roughly 15 minutes in the pool, two employees at the spa asked him to leave the pool because another guest had complained about him "wearing a stoma". The petitioner's assessment was that by refusing him their services, the spa had violated the principle of equal treatment in connection with his health condition.

It was possible to determine without any doubt that the spa had denied its services to the petitioner because of his health condition, that is because of his colostomy (stoma) and the stoma device he is forced to wear in connection with this condition. After establishing the causal link between the disadvantage suffered by the petitioner and his protected characteristic, the Authority also had to examine whether there were any reasonable grounds that were directly related to the pertinent legal relationship that would have justified this decision based on an objective assessment.

In seeking to justify the decision to deny its services to the petitioner, the spa invoked public health and hygiene grounds on the one hand, and aesthetic considerations on the other, arguing that the stoma device worn by the petitioner was readily visible to other spa guests.

With regard to the spa's argument concerning the potential risk of infections, the petitioner stated that he had worn a so-called stoma plug when he was in the pool, which provides a higher level of safety in terms of hygiene than the stoma bag. A description of the stoma bag used by the petitioner noted that the bag contains an integrated filter, and all packages also include filter plugs that can be used for showering and swimming. The Authority thus determined that it was possible to swim or bathe safely with a stoma bag. The petitioner's general practitioner, who was heard as a witness, also confirmed that the petitioner uses his stoma devices responsibly and safely and that he does not suffer from other conditions. Based on the above, the Authority concluded that there had been no higher risk of infection stemming from the petitioner than from essentially any other spa guest which would have justified barring him from access to the spa's services. It is obvious that a risk of infection emanates from every person visiting the spa, since they may have an illness that is in an infectious stage or they may suffer from condition (such as a genital infection or an ongoing flu infection) that is not outwardly visible and that the patient themselves may not be aware of or simply not find relevant, leading them to deliberately disregard it. In light of the above, the risk stemming from the petitioner was no higher than the risk associated with any other spa guest. That is why the Authority concluded that the spa's reference to public health/hygiene considerations, to wit the increased risk of infection stemming from the petitioner, was unfounded, which meant that the spa had failed to discharge its burden of proof.

With respect to the spa's argument that the stoma device is striking and readily visible to others, the Authority invoked Section 4 (1) (b) of the Health Ministry Decree No. 37/1996. (X. 18.) on the public health conditions of establishing and operating public spas. Pursuant to that decree, a public spa may not be visited by persons suffering from health conditions that manifest themselves in pathologic abnormalities of a striking manner or size. With regard to this argument, the Authority consulted with the State Secretary for Health in the Ministry of Human Resources. The State Secretary's position paper stated that the above cited provision of the Health Ministry Decree cannot be applied to persons who live with a residual change that results from a given health condition – insofar as they are considered healed. The written position noted that "with respect to some of the persons who live with a stoma bag, we can talk of a state involving a residual change from a previous health condition, which means that they, too, are not subject to the provision [of the NM Decree] cited above". In the case of the petitioner it was apparent based on the medical documents at the Authority's disposal, as well as the witness statement of his general practitioner, that the use of the stoma bag and various stoma devices was a result of a residual change stemming from a previous health condition.

The Authority explained in its decision that in light of the fact that in their quality as service providers, spas qualify as legal subjects that are obliged to comply with the principle of equal treatment, the NM decree had to be interpreted in conjunction with the Ebktv. What this means in practice is that they cannot

deny anyone access to their services on the basis of a protected characteristic, including the person's health condition, except in a situation when the refusal is based on grounds that are inherently linked to the nature of the underlying legal relationship and are reasonable based on an objective assessment. The latter implies that there must be exceedingly strong arguments to justify a decision that a given person cannot avail themselves of the services offered by the spa. The Authority's position was that the sight of a person with a palm-sized – maybe the size of a slightly larger palm – stoma device that created a bulge under his cotton T-shirt cannot serve to justify his exclusion from the public spa or publicly used pools. An exclusion on purely aesthetic grounds may result in the stigmatisation of the persons involved – i.e. the petitioner in this case – which will work against the broader legislative objective of creating and fostering the emergence of an inclusive society. The exclusion of the petitioner, who will live with a stoma for the rest of his life, from this service on the basis that the stoma device he uses might be seen by other visitors of the spa, was therefore not a justified action on the part of the spa.

In summary, the Authority did not accept the arguments invoked by the spa concerning public health/hygiene and aesthetic grounds as successful attempts at discharging the service provider's burden of proof. In this context, the Authority was especially mindful of the fact that on the day in question the spa had denied the petitioner's access to its services without any consideration of his individual circumstances. The Authority assessed that in effect this constituted a comprehensive exclusion from the spa's services, which was not mitigated by the fact that a spa employee offered the petitioner the option of dipping his lower limbs into the pool since that is obviously not the experience one is looking for when availing oneself of the spa's services. Moreover, the refusal to provide these services happened without a consideration of individual circumstances; the spa employee did not inquire about the petitioner's actual state of health or the quality and safety of the stoma device used by him, they did not make an effort to inform themselves. Based on the above, the Authority determined that the operator of the spa had violated the principle of equal treatment in connection with the petitioner's health condition when it had comprehensively denied the petitioner access to the services of the spa it operated without a consideration of his individual circumstances. That is why the Authority banned the company from future conduct of this kind and ordered the publication of its final and binding decision for a period of 30 days on the respective websites of the spa and the Authority. Furthermore, the Authority also imposed a fine of 300,000 forints on the service provider.

The service provider asked the Metropolitan Court of Budapest for a judicial review of the Authority's decision, but in its judgment 107.K.700.787/2018/10 the court dismissed the action. The judgment stressed that based on Act CL of 2016 on general administrative procedures, the Authority is free in setting its evidentiary procedure and it may evaluate the evidence at its disposal at its own discretion. The evaluation of the evidence in this case had been lawful and did not suffer from any apparent logical flaw, it had not been arbitrary but was instead reasonable and properly justified.

Only the Junior Suite is fully accessible
EBH/286/2018 - decision finding an infringement

The petitioner, who uses a wheelchair for mobility, had purchased a coupon for a four-star hotel. Upon the acquisition of the coupon, she immediately contacted the hotel which informed her that there was only one room in the hotel, the so-called Junior Suite, that was fully accessible for persons in a wheelchair. Booking that particular room required the payment of a 42,000-forint surcharge, however. The petitioner assessed that this violated the principle of equal treatment.

The hotel invoked that the rooms in the hotel tend to be small and that is why the lack of space had stopped them from providing full accessibility during the comprehensive renovation of the facility a few years earlier. When the current layout of the hotel had been designed, the plans included one suite where accessibility was a consideration. However, in the hotel's own words, this was only one consideration since the suite primarily served to satisfy the higher end needs of guests. The company assessed that the fact that it offered the petitioner the suite for the same price that any other guest would have to pay for it did not constitute a disadvantage for the petitioner.

Based on the principle of equal treatment, the goal is to design environments that persons with a disability are able to use autonomously. Making services fully accessible indisputably involves a financial burden, but at the same time the environment thus created also provides a higher quality standard and more friendly environment for everyone else, too. In the case at hand, the hotel had

created the Junior Suite to simultaneously serve as a suite for guests with higher demands as well as for marketing as a fully accessible room. Nevertheless, when selling the room to persons with limited mobility, the larger floor space, the wider doors and the bigger bathroom did not serve to satisfy higher end demands but the fundamental needs that persons with disability have to move about autonomously, even as at the same time the room also complied with the standards concerning accessibility. In these instances, therefore, asking for a surcharge was in contravention of the basic ideals of the UN Convention on the Rights of Persons with Disabilities (CRPD).

The Authority assessed therefore that the petitioner had been subject to a disadvantage in connection with her disability because she had not been afforded the option of availing herself of the hotel's services under the same conditions as other guests. If she sought to book accommodations at the hotel, she would have been compelled to pay a higher price than the other guests if she wanted a room that she could use autonomously given her situation. Persons who were in a comparable situation with her but not limited in their mobility could avail themselves of the same service without having to pay a surcharge.

The Authority determined that the petitioner had been subject to discrimination in connection with her disability because she could not access the desired service under the same conditions as other people, and thus she did not have the option of choosing a room that was more in line with her financial circumstances while it also measured up to the relevant accessibility standards. The Authority determined that the company operating the hotel had violated the principle of equal treatment, especially with respect to the requirement of accessibility.

The Authority banned the hotel from future conduct of this kind.

"We're not giving it to a pro-migrant organisation!"
EBH/323/2018 - decision finding an infringement

A foundation complained to the Authority that a company owned by the municipal government refused to rent it venues where it could host events. The foundation submitted that it had been denied access to the service in question because it has ties to an organisation that had been founded by an American businessman.

An employee of the foundation inquired by e-mail from the municipal company in question whether they could hold the opening event of their programme series at the venue operated by the company. The company's managing director responded in an e-mail that the company is fully owned by the municipal government and that as a result of the town assembly's decision it cannot rent facilities to the foundation or otherwise allow it to use any of the real estate managed by the company.

According to the town assembly's resolution, which was attached to the petition, the American businessman and his foundations seek to set up rural campaign centres which pursue goals that are harmful to Hungary and the Hungarians, such as settling migrants in Hungary and the creation of a mixed Islamic continent in the place of Christian Europe. The resolution called on local residents and organisations not to sell or rent space to these organisations or to otherwise allow them access to their real estate.

The petitioner submitted that it has been subject to a disadvantage because it had not been allowed to rent a hall from the municipal company for reasons having to do with its political opinion (Ebktv Section 8 (j)). It also submitted that a so-called "other situation" protected by the Ebktv Section 8 (t) also applied to it. As the relevant political opinion, it designated the views referred to in the town assembly's resolution which cited the American businessman in question; the organisation submitted that it did not in fact share the views attributed to the American businessman, which is why in the proceedings it referred to "presumed" political opinions. At the same time, however, it noted that it did have ties with a foundation established by the American businessman in question, which supports its activities aimed at raising legal awareness in civil society and other kinds of charitable work. It was the latter circumstance that constituted its other situation, in light of the fact that according to the municipal assembly's resolution it is an organisation that public opinion associates with being pro-migration.

The municipal company invoked that its websites do not feature actual price quotes nor do they call for offers aimed at concluding an agreement with potential renters. The texts on the website do not include such essential elements of a rental agreement as the price of the service in question, the duration of the service, the rental fee of the premises offered, or the periods when the premises are available for use. These vital elements of an actual offer or agreement are not featured on the website because the company is neither under obligation nor wishes to have contractual ties with just any and all natural or legal entities that might wish to enter into such a relationship with it. In fact, it is not free to choose its partners. It stated that according to its charter, it is obliged to discharge certain public responsibilities, and in the performance of these responsibilities it is free to choose in what way and to what degree it will use the real estate at its disposal. In a situation when it is contacted by natural or legal entities that seek to rent space from it, it can decide freely and on individual basis whether the given offer, programme or event matches the scope of its public responsibilities or not.

Based on a review of the contents on the website in question, the Authority determined that the company publicly advertises its event/conference venues for rental, and upon request it draws up a detailed price quote within a maximum of two working days. Thus, through its public advertisement it calls on a non-specified group of persons/entities to ask for a price quote, and in the same context it also drafts offers for concluding an agreement. On this basis the municipal company was obliged to comply with the principle of equal treatment according to Section 5 (a) of the Ebktv.

The presumed political opinion attributed to the petitioner was apparent based on the political views attributed to the American businessman mentioned in the town assembly's resolution. A change in a country's demographic make-up and its cultural relations are issues with a relevance for public discourse, and opinions about these constitute political opinions. Moreover, in light of their content and geographical scope and implications, these are sufficiently systemic-level opinions to satisfy the criteria previously laid out by the Advisory Board that used to operate alongside the Equal Treatment Authority, which had discussed the issue in detail in its position paper No. 288/2/2010. (IV.9.). Based on the definition proffered in the position paper, these opinions constitute a protected characteristic pursuant to the Ebktv's Section 8 (j). The Authority considered the circumstance that the petitioner is actually supported by the American businessman's organisation as falling under the scope of presumed political opinion, it did not evaluate it as a sui generis protected characteristic – i.e. other situation.

By attaching the correspondence between itself and the company, the petitioner successfully rendered probable the disadvantage it had suffered, which was manifest in the fact that the company had failed to provide it with the requested service: it did not conclude a rental agreement with the petitioner and it refused to engage in any further consultations in response to the latter's request to rent a venue. The causal relationship between the protected characteristic and the disadvantage suffered was also apparent in the letter in which the company rejected the petitioner's request, wherein it unequivocally referred to the town assembly's resolution.

The Authority did not accept the municipal company's defence that it is free to decide based on its own individual assessment with whom it enters into a contractual relationship and that it is completely free in the process to consider whether the given offer or event proposed meshes with its public responsibilities. The company failed to explain why the petitioner's programme did not mesh with the performance of its public responsibilities. In fact, it did not even make such an argument in its letter rejecting the petitioner's request, even though the petitioner had very clearly informed it about the nature of the event it planned to host. The principle of equal treatment must be complied with in respect of services that involve the performance of public responsibilities, and hence in this context the freedom of contract is limited by the principle of equal treatment.

The Authority further held that the "request" in the municipal assembly's resolution was not of a binding nature and did not restrict the company in terms of the provision of the services it offered.

Thus, the company had failed to refute the posited causal connection between the denial of its services and the petitioner's presumed political opinion, and it also failed to present other reasonable arguments to justify its actions that might have allowed the Authority to conclude that the underlying discrimination based on a protected characteristic did not violate the principle of equal treatment.

As a result, the Authority determined that the company had violated the principle of equal treatment by directly discriminating against the petitioner in connection with the presumed political opinion of the latter. As a sanction, the Authority imposed a fine of 200,000 forints and ordered the publication of its decision for a period of 30 days on the EBH website.

Accident insurance for autistic children
EBH/151/2018 - decision finding an infringement

A parent complained that an insurer refused to sell her autistic child an accident insurance policy. At the time when they requested an insurance price quote from the company, the parent informed the agent that the child had special needs and is autistic. Within a few days, the insurer informed the parent that they could not insure the child and they reimbursed the advance on the insurance premium that the parent had already paid. The parent assessed that the refusal to insure the child owed to his autism, and she further complained that the insurer had decided to reject the request for insurance without requesting medical documents and without performing an adequate review of the case.

The parent attached the expert opinion of the pedagogical assistance service, which made clear that the child suffers from autism spectrum disorder, specifically Asperger syndrome.

The insurer did not deny that it had refused to ensure the child because of his autism. The insurance broker had relayed the information that the parent had shared orally and as a result they took a detailed look into the underlying health risks. The insurer noted that it still had data concerning the petitioner's autism from a prior case four years earlier. It emphasised that in extending life, accident and health insurance policies, the insurer is authorised to weigh the risks stemming from the prospective client's health condition. It explained that

autism is a form of mental illness and the insurer rejects almost every request for insurance when the prospective client has a mental illness because there is a high risk that an accident could befall the insured person and that they will need hospital care. According to the current state of the medical sciences, autism spectrum disorder is a lifetime condition that can lead to unpredictable events. To support its position, the insurer attached the characteristics of autism as summarised in detail by its in-house senior physician. The summary also noted that persons with autism are subject to a significantly higher than average risk of an accident and, moreover, the full extent of the risk cannot even be gauged because the severity of the condition ranges on an extremely wide scale, with some symptoms manifesting themselves unexpectedly, often without prior warning. In some cases those who suffer from this condition cause damage to themselves for no apparent reason.

In addition to noting that the risk was not assayable, the insurance company also argued that as compared to the annual insurance fee of roughly 20,000 forints a year, a detailed risk assessment opinion could cost as much as 50,000-100,000 forints and the insurance company could not be expected to pay for these costs. It also attached articles and scientific research reports downloaded from the internet to support its position, which showed that autistic persons are more likely to suffer accidents.

In light of the fact that the claim that the insurer had refused to insure the child because of his autism was actually not in dispute, what the Authority had to examine was whether there were any legally acceptable grounds for the rejection that did not violate the principle of equal treatment.

The Authority did not agree with the arguments proffered by the insurer to justify its action. It is indisputable that the insurer can lawfully assay the risks and employ statistical methods and mathematical models in the process. Based on the physician's opinion and the articles attached by the insurer submitted, the Authority also accepted that generally speaking there was a higher-than-average risk of an accident in the case of a person with an autism spectrum disorder. There may obviously be reasonable grounds that are directly pertinent to the underlying legal relationship that justify an insurer's decision not to accept the risk when the possibility of the event in question exceeds a certain threshold of probability.

At the same time, however, insurers are obliged to comply with the principle of equal treatment. Since statistical data in and of themselves do not allow for definite conclusions in any given case – they only attribute a mathematical probability to the given situation – the use of statistical methods carry with themselves the risk that someone will be treated unfavourably merely because they are part of a given group that possesses a protected characteristic that is associated with a higher likelihood of the given event. Therefore, using only the statistical method inherently runs afoul of the principle of equal treatment. In light of the aforementioned, when it comes to certain services where the nature of the service in question makes it inevitable to consider risks associated with some protected characteristics, the Authority examines whether it is possible in the case of the given individual to come up with a more detailed and accurate prognosis, in other words whether it is possible for the service provider to arrive at a more personalised assessment at proportional cost.

Since the individual at issue here was a 10-year-old child, the insurer should not have drawn conclusions from data that was several years old without examining the child in question, and that was true even if autism – just as Asperger syndrome – is a developmental disorder that stays with a person and influences them over their entire lifetime. The petitioner's most recent expert medical opinion would have been available to the insurer at no extra cost and would have allowed the company's experts to arrive at a more accurate assessment of the petitioner's state and his specific diagnosis. The insurer did not make an effort to obtain this report, however, in fact it did not even ask for any medical documents and instead automatically decided without any further assessment that it would not insure the petitioner.

Nor did the Authority find that the insurer in fact refuses to insure anyone who suffers from a mental illness, or that it does so automatically in the case of someone who suffers from panic attacks or has tried to commit suicide, for example. Moreover, the insurer only demonstrated the higher-than-average risk to be applicable to persons with autism spectrum disorder generally, while Asperger's is a fundamentally milder condition in the extremely broad range of the autism spectrum.

Based on the above, the Authority held that the insurer had violated the principle of equal treatment in its handling of the petitioner's case and had directly discriminated against him. The Authority banned the insurer from future conduct of this kind and ordered it to pay a fine of 500,000 HUF.

The insurer sought a judicial review of the Authority's decision. In its final and binding decision No. 106.K.700.782/2018/11, the Budapest-Capital Regional Court dismissed the insurer's action. The decision stressed that the Authority had not ruled that refusing the insurance was in and of itself discriminative, it had merely impugned the method whereby the insurer had arrived at its decision in this case. It emphasised that the finding that the principle of equal treatment had been violated was based on the observation that the insurer had not even made an effort to learn about the petitioner's specific state but had instead decided to refuse to insure him without further examination and analysis, merely based on the fact that the petitioner has autism spectrum disorder.

CAPCHA – an impediment to persons with a visual impairment
EBH/14/2018 - case concluded with a settlement

The petitioner, who has a severe visual impairment and uses the computer with the help of a screen-reading software, was the client of a bank and in that capacity he participated in a lottery-type game using his savings account, where the winner of a car is picked based on the account number. He wanted to find information about the results of the drawing on the bank's website, but the website only features the list of the previous month's winners, while the results of the given month were not displayed. The petitioner wanted to contact the bank's customer service about this. He entered the bank's "accessible" website, but the only way for him to send a message with his complaint on the dedicated page would have required him to enter a set of distorted characters, a so-called CAPCHA. This proved impossible with the use of screen-reading software. The petitioner's assessment was that the complaint method in question was not accessible to persons with a visual impairment who use a screen-reading software, which meant that the bank had violated the principle of equal treatment in the context of the petitioner's disability (his visual impairment).

The Authority held a hearing in the case where both parties expressed their openness to a settlement. As part of the settlement concluded between the parties, the bank undertook to ensure within a short timeframe equal access to the webpage in question where complaints can be filed, and to make sure that the petitioner can verify accessibility. The parties also agreed that the bank

would offer the petitioner the possibility to test the improved website; the petitioner undertook to cooperate with the bank in the latter's performance of these undertakings.

Be careful when the train arrives!
EBH/74/2018, EBH/75/2018 - decisions finding an infringement

The Authority received several complaints in which the petitioners' grievance was that they could not avail themselves of the railway services due to lacking accessibility.

In one of these cases a petitioner with visual impairments complained that when he was deboarding a train at a rural station his leg slipped between the train and the platform and he fell. Even though his assistant dog had sought to warn him, the petitioner found himself unable to prevent the accident because the gap between the platform and the steps of the train was larger than usual. The Authority launched proceedings based on the petition. The rail service provider argued that the height of the platform and the distance between the railway vehicle and the platform at the station both conformed with the relevant regulations. The Authority held an onsite inspection to ascertain the facts and performed a measurement which showed that the gap between the platform and the steps of the train was in fact 8 centimetres wider than allowed by law. The Authority's decision held that the provider had violated the principle of equal treatment by failing to adhere to the legal regulations mandating the maximum distance between the vehicle and the platform. As a result, the petitioner had been subject to direct discrimination on account of his disability (visual impairment) since the legal provision in question had defined the maximum gap between the platform and the train expressly in the interest of safeguarding the rights of people with limited mobility, including those with reduced vision and blind persons. As a sanction, the Authority ordered the railway provider to realise by 31 December 2018 at the latest the conditions necessary for fully accessible transportation in the context of boarding and deboarding a train. The Authority also imposed a fine of HUF 200,000 on the railway provider. The provider paid the fine and also complied with the other obligations determined by the Authority. The entire railway line was fully electrified, and FLIRT tram electric trains were put in service along the entire line; the gap between the train and the platform is smaller for these trains than it is for the Desiro trains that had been previously used along the line. This made the vehicles fully accessible in terms of boarding and deboarding.

In another case a petitioner with reduced mobility who moves with the help of crutches complained that she could not travel on her own from a rural railway

station in the absence of accessible transportation, despite the fact that prior to the travel she had written a message to the dedicated e-mail address indicating her desire to travel at the specified time, and she had received a message confirming that her request had been received. On the day of her travel, however, the lift at the railway station was not working and the railway car was not directed to the only fully accessible platform. Ultimately, the petitioner had to be carried by five relatives who were accompanying her on a flight of stairs with over 20 steps to the platform where her train was arriving. The Authority launched proceedings based on the petition. The railway service provider argued that the railway station in question had not been informed prior to the travel that a person with reduced mobility would be travelling from there. It further noted that at that point the lift had been out of operation already for several days due to a malfunction in the uninterruptable power supply; the company had reported the problem to the company responsible for servicing the lifts. The Authority held that the petitioner had been unable to avail herself of the services provided in a fully accessible manner and that this owed to reasons falling within the service provider's scope of responsibility (administrative error and the defective lift). The service provider had thereby directly discriminated against the petitioner in connection with her disability. As a sanction, the Authority banned future conduct of this kind and it ordered the elimination of the infringement by having the elevator at the stations repaired. It also imposed a fine of 100,000 Hungarian forints. The service provider paid the fine and complied with the Authority's order.

Use of services with an assistance dog
EBH/344/2018, EBH/38/2018, EBH/345/2018, EBH/143/2018 - cases concluded with a settlement
EBH/115/2018, EBH/355/2018, EBH/464/2018 - decisions finding an infringement

The Authority received numerous petitions in 2018 in which persons with visual impairments complained that they had not been allowed to access various facilities and stores with their assistance (seeing-eye) dogs. Even though the relevant regulations concerning assistance dogs have been in place for quite a while now – and in 2018 the Authority had already released a publication which expounded on the rights of persons who own assistance dogs – the high number of such submissions suggests that service providers and other facilities are often unaware of the rights of persons with disability who rely on assistance dogs.

The essence of the right to equal access of persons with disabilities – hence including persons with visual impairments – is that they need to have equal access to the services offered by a given institution or facility. In ascertaining whether a person with a disability has the right to enter a premise in question with an assistance dog, one must proceed on the basis of Act XXVI of 1998 on the rights and equal opportunities of people with disabilities (hereinafter referred to as Fot, following the Hungarian abbreviation), as well as Decree No. 27/2009. (XII. 3.) of the Social and Labour Ministry on the rules for training, testing and evaluating the fitness of assistance dogs. Based on these rules, a person with a disability (visual impairment) is entitled to access with the help of an assistance dog the facilities and areas of public institutions that are open to the general public, including any type of institution or providers that offer public services. Paragraph 9 (1) of the abovementioned decree includes examples rather than an exhaustive list of places where such access with the use of assistance dogs is granted. Access and the use of assistance dogs may only be denied in areas that are closed to the general public.

In case No. EBH/344/2018 the petitioner turned to the Authority because he could not avail himself of the services of a spa. The petitioner sought to enter the area of the spa together with his assistance dog but was informed by the personnel of the service provider that the dog may only stay in the spa's park but may not access the dressing room area. During the Authority's proceedings, the spa invoked that the dog had been barred from entry to the spa on public health grounds. The house rules of the spa and the managing director's standing instruction provide that assistance dogs may not be allowed within 5 metres of open-air pools, outside showers, saunas, playgrounds, jacuzzis, and they may also not access certain designated areas of the public spa (pools, pool areas, footbaths, saunas, steam cabins, hipbaths, common dressing areas, restaurants, therapeutic and resting areas). Moreover, the rules provide that for the duration of their owners' stay at the spa, assistance dogs need to be taken away from their owners after the latter have changed into their bathing suits. The animals are then placed in a specially designed area for the duration of their owner's stay at the facility.

The parties concluded a settlement in the case, as a result of which the service provider amended the house rules and the managing director's standing instruction is in compliance with the effective legal regulations on the subject, also with a view towards reflecting the official position of the National Centre for Public Health. Based on the amended house rules and standing instructions of the managing director, assistance dogs are now allowed to enter the spa area and move about practically anywhere on the grounds, with the exceptions of the inside areas of pools, jacuzzis, hipbaths, showers – in other words those areas where the dogs might be in contact with water – as well as the insides of steam cabins and saunas.

It is particularly pleasing and promising when cases that touch on the situation of persons whose protected characteristic is disability can be resolved in a mutually satisfactory manner with a settlement. The Authority approved such settlements in several similar cases in which a person with visual impairments suffered a grievance in connection with their use of an assistance dog. In such cases, the visually impaired clients typically sought to avail themselves of some service, thus they wanted to enter a bakery (Case No. EBH/38/2018) or a grocery (Cases No. EBH/345/2018 and EBH/143/2018), for example. In the settlements agreed upon in these cases and approved by the Authority, the subjects of the procedure apologised to the petitioners and undertook to inform their employees of the Authority's publicly released information concerning the rights of assistance dog owners.

In several other cases, however, the Authority rendered decisions finding an infringement. In case No. EBH/115/2018 the Authority ruled against a museum that had refused to allow a client with visual impairment to enter the museum's facilities with an assistance dog. The Authority ordered the museum to cease the infringing situation and to change the signs which indicated that its facilities could not be visited with a dog to make sure that the actual access with an assistance dog reflects the effective legal regulations. The Authority also found a violation in Case No. EBH/355/2018 because a hotel barred a severely visually impaired petitioner from using its services with a seeing-eye dog, invoking the house rules that barred pets from the hotel. The Authority obliged the hotel to cease the infringement and to inform its employees about the provisions of the previously mentioned Decree No. 27/2009 of the Social and Labour Ministry concerning seeing-eye dogs. Another decision finding an infringement was rendered in a case (EBH/464/2018) in which the visually impaired petitioner sought to enter a restaurant with her seeing-eye dog but was barred by the restaurant owner from so doing. Since the restaurant owner acknowledged the violation during the proceedings and apologised to the petitioner, the Authority found that the sanction of banning such kind of conduct in the future was sufficient in this case.

Persons with visual impairment and electronic administration
EBH/150/2018 - decision to terminate the procedure

If the petitioner rescinds their application during the proceedings, then the Authority terminates the procedure with the result that the case appears inconclusive. Nevertheless, in several such cases the Authority's work exerts a discernible impact even without the weight of an actual decision. In one such case the Authority was asked to step in by a nationally operating NGO which complained that the software used to fill out forms during public administration procedures is not accessible for persons with visual impairments. Specifically, in that case at hand the petitioner impugned the lacking access to electronic judicial proceedings. The petition asked for proceedings to be launched against the government ministry responsible as well as the organisation responsible for the central administration of judicial courts in Hungary. Based on the petition, the Authority launched proceedings against the entities in question. It held a hearing in which all stakeholders explained that they wished to settle the case amicably and asked for an appropriate deadline to give them sufficient time to comply with the legal and technical provisions of the settlement and to solicit the involvement of the relevant experts. Finally, the petitioner informed the Authority that it had come to an agreement with the public bodies in question, and that they had signed an agreement outside the Authority's proceeding also involving other public bodies that were not subject to the ongoing proceedings. The settlement set out a clear deadline for making electronic administration fully accessible. Having regard to the agreement, the petitioner withdrew its petition and the Authority terminated its proceedings in the case.

Making underground stops accessible
EBH/25/2018 - decision to terminate the procedure

Another case that resulted in a termination of the Authority's procedure pertained to the renovation of underground line M3 in Budapest. In this case an NGO representing persons with limited mobility turned to the Authority as a public interest petitioner. The organisation complained that – at the time when the petition was filed – the plans for the reconstruction of the M3 line planned to leave some of the stops along the line without full accessibility for persons with limited mobility, which implied a very real risk that upon the completion of the renovation of line M3, persons with disability/reduced mobility would not be able to avail themselves of this public service.

The public interest petitioner referred to the competent municipal government, the government ministry responsible for representing the Hungarian State in this context, as well as the public transportation company operating the designated underground line as the subjects of the procedure in this case.

The Authority called on the aforementioned bodies to submit a statement and held a hearing in the case, while consultations were also ongoing between the parties outside the scope of the Authority's procedure. Since the public interest petitioner and the municipal government in question concluded a settlement outside the framework of the Authority's procedure, the petitioning organisation withdrew its complaints regarding all three subjects of the procedure. As part

of the agreement, the municipal government undertook to make another six underground stations accessible. Having regard to the withdrawal of the petition by the petitioning organisation, the Authority terminated the proceedings.

Although ultimately the Authority did not have to render a decision in this case since the petition was withdrawn by the petitioner, it is worthwhile to briefly discuss the relevant legislative framework that applies to this case and the Authority's interpretation of the pertinent provisions.

According to Section 51 (4) of Act XLI of 2012 on the carriage of passenger services, the conditions for equal access must be gradually provided with respect to vehicles that perform the regularly scheduled public transport of passengers and, furthermore, with regard to those parts of railways terminals and those sections of stations and stops that are used to conduct passenger traffic or to otherwise serve customers. To this end, any investments, developments and procurements that are aimed at such vehicles or facilities, as well as any structural changes to these must reflect the requirement of equal access if that is technologically feasible.

The Ebktv includes provisions that require compliance with the principle of equal treatment and Act XXVI of 1998 on the rights and equal opportunities of people with disabilities mandates equal access to services for persons with disability, and both do so without a specific deadline – hence making this a requirement that needs to be met immediately – the act on the carriage of passenger

services, by contrast, provides for gradualness in implementing the requirement of equal access.

According to Article 9 (1) of the United Nation's Convention on the Rights of Persons with Disabilities (CRPD), which was promulgated by Act XCII of 2007 in Hungary, "[t]o enable persons with disabilities to live independently and participate fully in all aspects of life, State Parties shall take appropriate measures to ensure to persons with disabilities 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". Article 4 (2) calls on the signatory states to take appropriate action to progressively realise the full extent of the rights set out in the Convention. General Comment No. II attached to the Convention calls for continuous and systematic gradual progress in realising equal access, also emphasising the importance of setting deadlines and following the principle of universal design specified in the Convention when designing new structures and services.

In the Authority's view, the notion of gradual progress in the law on the carriage of passengers must be interpreted in compliance with the Convention to say that in the case of pre-existing facilities and services, any impediments to equal access may not remain in place in the long run. The necessary steps for eliminating these must be taken continuously and with planning. At the same time, new developments, investments and procurements may only be implemented if the final result is in compliance with the principle of equal treatment.

Education

This does not belong at the university
EBH/32/2018 - decision finding an infringement

The petitioner was an umbrella organisation of NGOs dealing with lesbian, gay, bisexual and transgender (LGBT) rights and its complaint concerned a national human rights project aimed at improving the visibility and social acceptance of LGBTQI persons. One element of the project was a lecture series, and as part of this series the petitioner planned lectures and roundtable discussions about LGBTQI persons in cooperation with university departments and other university-affiliated organisational units. In the interest of organising such a lecture, the petitioner contacted two staff members of a prestigious Hungarian university and they agreed on the specific time, date and location for the event. The agreed upon location was one of the university auditoriums. The event was advertised

on posters and on social media. The organisers looked for other possibilities to promote the event even more widely at the university, but at the time one of the university employees who was involved in organising the event told her fellow organisers that there were signs that parts of the faculty were protesting against the event. Five days prior to the scheduled event, the university rector convened a consultation about it, calling on the two university employees who were involved in the organisation to attend along with the dean of the division in question. At the meeting, the rector informed those assembled that such an event does not belong at the university, it should be held elsewhere. At the same time, the dean also confirmed that they would not agree to holding the event anywhere on university grounds.

The organisers quickly tried to arrange a different venue for the event and a mere day before the event was scheduled they managed to come to an agreement with a non-profit corporation that manages one of the university's event centre. However, one of the organisers who was a university employee informed the other organisers that the rector's ban extends to the new venue as well, since that, too, is on university grounds. The next day an employee of the non-profit facility management company informed the advertisers that the university had not allowed them to provide space for the event. As a result, the event had to be cancelled.

The petitioner asked the Authority to proceed in connection with direct discrimination on the grounds of sexual orientation and gender identity. The Authority launched proceedings against the university and against the company that operates the event centre in question.

Both the Ebktv and the Authority's consistent application of the law make clear that violations of the principle of equal treatment may also affect organisations, since the protected characteristics of organisations can extend to their members or the group of persons whom a given organisation represents.

The university invoked during the proceedings that it had barred the event for violations of formal/procedural reasons rather than the issues that the event sought to address. The event had been organised by an external organisation and as a result it did not qualify as a university event, even if university staff were involved in organising it. As an external event, it was subject to the university's prior approval. The company that operates the event centre invoked that it had been unable to host the event due to the brevity of time between the corresponding request by the organisers and the scheduled date of the event. The lack of time made it impossible to follow the normal procedure and to obtain the rector's approval.

The university failed to show, however – and the witness statements also failed to corroborate this – that the event was actually an externally-organised event that would have required the rector's prior approval. Moreover, the witness statements unequivocally showed that the rector's actual objections to the event had not been procedural but substantial.

At the same time, it was also possible to determine that if the underlying problem had been merely procedural, then the event could have been held on university grounds at a later time once the organisers had obtained the necessary approval in the procedure that applies applicable to outside organisations. However, such an option was not actually offered either by the university or the non-profit company. The petitioner for its part even offered to conclude a settlement during the proceedings, which would have allowed it to hold the event at a later date. The university failed to follow up on the proposal, however, which left the Authority convinced that the university did not at all intend to allow the event to be held on its premises.

As a result, the Authority concluded that the reason why the event could not be held at the university pertained to the issues that it sought to address rather than to procedural considerations; it assessed that the reason for rejecting the petitioner's request was a protected characteristic of the petitioning organisation's members and the group of persons it represents (their sexual orientation and gender identity), and thus the petitioning organisation had been subject to

direct discrimination, for which the Authority held both the university and the company operating the event centre responsible.

The Authority banned this kind of conduct in the future and ordered the publication of its decision on the websites of both the university and the Authority, and it imposed a fine of 100,000 HUF against the university.

The university asked for a judicial review of the Authority's decision, but the Budapest-Capital Regional Court, which shared the Authority's assessment. dismissed the university's appeal. The non-profit company did not seek judicial remedies in this case, and hence the judicial review did not extend to this aspect of the decision.

The "bad child" is not allowed to go on the excursion
EBH/65/2018 - decision finding a partial infringement

A parent raising a special needs child who suffers from a psychological developmental disorder turned to the Authority with a petition against the child's elementary school. For one, the parent complained that the school had failed to take the child along on a class excursion, while at the same time she also cited as a problem that the child had not received the corrective speech therapy and psychological support which had been among the special needs therapy classes prescribed by the relevant expert opinion.

The Authority launched proceedings against the school and held a hearing in the case.

With regard to the class excursion, the school stated that the child had failed to integrate into the classroom community; he often behaved aggressively towards his fellow students and the teachers; rejected all requests by the teaching staff and even the assembly often proved to be a problem for him; he was also unwilling to follow the instructions he was given. The school further submitted that the child's homeroom teachers had decided not to take him along on the excursion because travelling with a group of such children carries risks and they could not vouchsafe the child's safety and physical well-being. In other words, the school invoked the petitioner's safety and referred to behavioural problems that were linked to his protected characteristic.

The Authority rejected the school's argument that they would have been unable to guarantee the child's safety because of the risks stemming from the excursion-related transportation and travel. The school had failed to adequately show why that would be the case. Even before the excursion in question, the child had participated in several events that the student groups had only been able to reach by using public transportation, and no information was presented to suggest that any of these had resulted in unforeseen events or emergencies.

On the question of whether the school can lawfully exclude a student from the school excursion, the Commissioner for Education Rights explained in a position paper that was provided for information purposes only that the "Act on Public Education defines the concept of 'school day' as follows: educational lessons or class or group sessions that are part of the school's educational programme but may not be carried out within the framework of school lessons, including but not limited to school excursions, environmental educational events or cultural or sports events, provided that the activity in question involves at least three hours. Section 33 (1) (bk) of Government Decree 229/2012. (VIII. 28.) includes a provision about excursions that fall into the range of free services offered as part of the implementation of the broader pedagogical programme, and which serve the need to impart and work through the curriculum that has been mandated for all students. According to the aforementioned provision, any excursion that is related to the implementation of the broader pedagogical programme; which serves the need to impart and work through the curriculum that has been mandated for all students; and is organised correspondingly as a school day, is mandatory for students and they may not be excluded therefrom with reference to behavioural problems".

Also having regard to the above cited statement by the Commissioner for Education Rights, the Authority rejected the school's reasoning for excluding the child from the excursion because of his behavioural problems and held that the educational institution had directly discriminated against the petitioner in connection with a protected characteristic (other psychological developmental disorder) the existence of which had been confirmed by an expert opinion.

With respect to the speech therapy-related aspect of the complaint, it was beyond dispute that the child had failed to receive speech therapy. In this context, too, the Authority rejected the school's defence, which argued that it had been unable to provide the speech therapy in question because the school's therapist was not competent to perform them because of the child's anatomic features. Section 47 (10) of Act CXC on National Public Education provides that "experts with

appropriate professional qualification as required for the education of children / students with special education needs may also be provided through the mobile network of special needs teachers". Thus, if the school did not have immediate access to a properly trained expert, then it should have taken action to ensure that the speech therapy be provided by availing itself of the services of the mobile network of special needs teachers. The Authority did not find that the school had taken the appropriate steps in the interest of providing the corrective speech therapy prescribed by the expert opinion on the child's condition. By failing to take the requisite measures, it had violated the principle of equal treatment in its handling of the petitioner's situation.

The parent further complained that the school had failed to provide the psychological support that the expert opinion on the child's condition also called for. Since the parties offered mutually conflicting interpretations of what the "psychological support" stipulation in the expert opinion meant, the Authority turned to the competent expert committee of the pedagogical assistance service. According to the information provided by the pedagogical assistance service, in this context "psychological support" meant that the teachers working with the child were expected to pay special heed to improving the student's willingness to cooperate, to promote his adaptation to the school environment and to further his integration and anger management skills. In this context, the school noted that the child had received the relevant psychological help from all the teachers who had worked with him, which the parent did not dispute either. The Authority therefore found that no violation of the principle of equal treatment applied in this context.

Cases concluded with a settlement in the sector of education

In cases involving minors the Authority strives especially intensely to conclude the case with a settlement. In situations when relations between the parties have not deteriorated to such an extent as to rule out an agreement, as long as the parents' trust in the educational institution in question has not been fully eroded and both parties make an effort to resolve the underlying situation, they often find a mutually agreeable settlement with the help of the Authority. In these cases the Authority enshrines and approves the settlement between the parties in a decision, which ensures the implementability of the agreement. In the following, we will review a few of these cases.

Not only the proper diet but the information of the parents is also vital
EBH/230/2018 - case concluded with a settlement

In this case the parent complained that the child's school – and the municipal government operating the school – had failed to provide the appropriate lactose free meals that are compatible with her child's lactose and egg intolerance, which had been verified by a physician. Specifically, she complained that the items on the school's menu of meals that were labelled as dairy-free also featured an abbreviation "lm" (which stands for laktózmentes, that is lactose-free in Hungarian), even though that is not the same thing as dairy-free. She further complained that she has no information whatsoever about what the petitioner eats during the day, which stands in the way of her keeping a dietary diary, which she is required to do in connection with the child's condition.

The school stated during the procedure that it would immediately inform the town's institutional services of the complaints regarding the public meals and the dietary services provided by the school, and that it would publish the menu and the ingredients of the meals – insofar as these would be shared with the school – on its website as well in a public location in the dining hall.

The municipal government stated during the procedure that the abbreviation "lm" on the menu did indeed indicate lactose-free, but all the meals on the menu that were listed as dairy and egg-free were also lactose-free, and that they uniformly use rice drinks to substitute milk and dairy products in the meals for children who need a lactose-free diet.

It emerged therefore that what was at issue was not the provision of appropriate meals that are compatible with the child's health condition – or lack thereof – but the failure to properly inform the parents. The parties concluded a settlement. As part of the settlement, the municipal government committed itself to the following undertakings: a) initiating effective communication between all organisations and companies involved in providing school meals for children and to continue to maintain the line of communication between them; b) to place information boards in all school dining halls that feature information to contact those who provide the meals and the persons responsible for this particular task; c) to implement a review and control system as part of which the companies active in providing school meals would be reviewed with appropriate frequency and with the help of the municipal government's institutional services – this would include heightened attention to making sure that special dietary needs were being properly met; d) to continuously ensure in cooperation with the municipal government's institutional services that children with special dietary needs and their parents are continuously updated about all relevant changes in the menu; e) the meals provided to the petitioner specifically would

be delivered in food containers provided by the parents, which would be labelled with the child's name, and that the name of the given dish would be indicated on the container; f) the menu of meals for children with special dietary needs would be sent to the school in question every week.

The school undertook to ensure that all parental complaints concerning the meals and the diet would be immediately forwarded to the town's institutional services and also pledged to ensure that the menu would be displayed both on the institution's website and at the school's dining hall. The parent and the municipal government approved the school's undertakings and considered the case thus concluded.

It's not enough to provide half-day kindergarten care
EBH/128/2018 - case concluded with a settlement

In another case before the Authority the parent complained that the kindergarten officially designated for her children had failed to provide integrated kindergarten care for the children. The children were only allowed to spend four hours a day at the kindergarten and they were not provided with meals either. Furthermore, they were not allowed to participate in joint exercises and other kindergarten events and were also not allowed to go into the courtyard with the other children. During the proceedings, both parties evinced an openness to conclude a settlement. As part of the settlement, the kindergarten undertook to provide daycare for the children every day from 8AM to 4PM, and to make sure that the children would be allowed to participate in the kindergarten events. The parties also agreed that the kindergarten would ensure two weekly hours of special needs therapy classes at a time that does not coincide with the children's playtime in the kindergarten's yard, in order to ensure that the children can play outside with their fellow kindergarteners.

Gradual integration of home-schooled student
EBH/381/2018 - case concluded with a settlement

In this case the parent of a child filed a complaint against her child's elementary school, which is operated by a private foundation. She complained that her child, who has special needs and attention deficit and activity disorders, had not been reintegrated into the classroom community by the educational institution that the relevant expert opinion had designated for her to attend. The expert opinion had namely provided that during the academic year 2017/18 the underage petitioner should pursue her education as a home-schooled student while being enrolled at the school, and that she should be gradually reintegrated into the classroom community by the end of the academic year. The Authority launched proceedings against the school which submitted that the expert opinion had designated the end of the academic year as the deadline for the student's reintegration, and in compliance with that deadline the child had spent the mornings of the last week of the academic year with the class. The Authority held a hearing in the case and the parties concluded a settlement during the proceedings. They agreed that during the coming academic year 2018/19 the school would make it possible for the child to comply with the legal requirement of compulsory school attendance by going to the school every day, starting with a three-week reintegration period at the beginning of the year.

Other cases

It's not enough for them to be LGBT, they have to dabble in politics, too!
EBH/241/2018 - decision finding an infringement

A civic group representing LGBTQ people complained that a state institution that operates a so-called "community space" barred them from using this space for hosting future events, even though they had previously been allowed to use the space for various types of events without any problems. The manager of the venue justified the decision by arguing that political parties had been barred from accessing the community space, and the petitioning organisation was engaged in politics. The petitioner was forced to move the already scheduled and announced events – a film club and a membership convention – to another location. The petitioner assessed that it had been barred from the space because of its political opinion and the sexual orientation of its members. The petitioner submitted that its political opinion was publicly known – also because it had previously joined a movement to protest Act LXXVI of 2017 on the transparency of organisations receiving foreign funds and had participated in demonstrations organised by the movement.

The institution complained against submitted that it maintains and operates the community space as part of an EU-funded project and the petitioner's activities only marginally contribute to the realisation of the project objectives. It further stated that the primary target group of the project are youths aged 12-25 who are considered as an especially sensitive group when it comes to sexuality and the issue of sexual minorities. One most guard against the risk that the children's right to proper development is potentially violated by an encounter with sexually charged situations that are either inappropriate or too early in terms of their intellectual or moral development. The institution assessed that the programmes organised by the petitioner – which concerned the situation of

persons who are sexual minorities – received disproportional amounts of space and time. It argued that since it had no control over the petitioner's political and ideological values spreading into the community space, the goal of keeping that space free of political and ideological influence might be jeopardised. It further emphasised that it had not barred the petitioner from the community space, it had merely refused to allow it to host further events there. The right of organisations or their individual members to participate in other programmes at the venue had not been restricted.

The parties evinced an openness to conclude a settlement but ultimately failed to agree on one.

In its decision, the Authority examined whether a causal relationship had prevailed between the sexual orientation and the political opinion of the petitioning organisation (its members and the persons it represented) and the fact that the subject of the procedure had barred it from hosting events in the community space. In this context, the Authority also examined the reasons proffered by the institution for rejecting the organisation's request to hold an event at the venue. With respect to the argument that the petitioner's events contributed only marginally to the realisation of the project objectives, the Authority asserted that the project goals had not changed between 2016 and 2017, and the previous 17 events held by the petitioner had not been seen as being in conflict with the project objectives. With respect to the discussion of issues relating to sexual minorities and their potential adverse impact on youths, the Authority held that neither the previously hosted nor the planned events sought to provide sex education. Instead, the events had been aimed at community building and did not feature a sexual dimension. The Authority stressed in this context that the claim of the institution that the sexual orientation of the petitioner's members and the organisation's events could have a harmful impact on the youths aged 12-25 is in and of itself discriminative and violates human dignity. With respect to the claim that the institution had no control over the petitioner's political views spreading into the community space, which would constitute a violation of the objective of keeping the space free of political and ideological influence, the Authority noted that the petitioner had neither held political events previously nor was it planning to do so in the future. The film club and the member convention it was planning to host were also not political.

Based on the above, the Authority determined that a causal relationship did apply and that when it had rejected the petitioner's request to hold an event in the community space, the subject of the procedure had directly discriminated against the petitioner on the grounds of sexual orientation and political opinion.

The Authority banned future conduct of this kind on the part of the institution and imposed a fine of 100,000 forints.

Cellmates

EBH/272/2018 - decision finding an infringement

The petitioners complained against a prison where they had previously served their sentence together as cellmates. Following the release of one of them, the petitioners entered into a civil union at the prison. After the civil union took effect, the petitioner who continued to serve his prison sentence at the prison asked the warden to allow him to keep personally in touch with his partner who had been released from the prison. However, the prison only allowed for contact between the petitioners over the phone and via mail and did not authorise personal visitations. The petitioners assessed that the prison barred them from personal contact (visitations) because as partners in a civil union they were a same-sex couple. Thus, the petitioners argued, the prison had violated the principle of equal treatment with respect to their sexual orientation.

The Authority investigated whether the failure to authorise personal contact (visitations) between the petitioners was connected to the petitioners' sexual orientation or whether the underlying reason was something else. Based on the statements of the prison warden, it was apparent that the prison tends to permit personal contact (visitations) between married couples and civil partners of opposite genders, as well as relatives who previously served their prison sentence together.

The prison invoked that the decision to restrict personal contact in this case owed primarily to security considerations. The prison warden pointed out that personal contact in this case would allow for sneaking in banned objects, for example. Thus, there had been incidents when relatives of prisoners successfully evaded the security rules in place during the entry into the prison. This risk is increased even further when the relative is aware of the architectural and structural features of the prison. The Authority assessed, however, that the same risk factors apply when family members previously served their sentence together, and according to the warden in such a situation contact between them tends to be allowed. According to the warden's statement, no special or specific security risk applied in this case that would have justified a deviation from the general practice.

The Authority emphasised in its decision that persons who serve their prison sentences are not merely detainees but individuals who are intertwined in personal relationships and have families. Furthermore, staying in touch with family is of fundamental importance in terms of mitigating the harm that stems from a stay in prison and also for the prisoners' reintegration into society after they have served their sentence. In the case of the petitioners, the relationship that served to establish the existence of familial ties was the registered civil union,

which is – similarly to marriage – one of the closest bonds that humans can form. The Authority did not dispute that the internal rules of the prison, as well as the security of detainment, were considerations that prisons have to be especially mindful of, and that in some cases these may be used to justify restrictions on the personal contact between prison inmates and persons outside the prison. In the case at hand, however, the statements submitted by the institution complained against, as well as the data they provided, did not serve to substantiate the claim that this was the reason why the petitioners could not stay in personal contact; in other words, the prison had failed to show that the contact between them had not been restricted because of their sexual orientation.

Thus, the Authority determined that the prison had violated the principle of equal treatment in connection with the petitioners' sexual orientation when it had not allowed them to stay in personal contact (visitation). The Authority instructed the prison to end the infringing situation and ordered the publication of its decision for a period of 30 days on the website of the prison and of the Authority.

The serving matters

Pursuant to the Ebktv, the Authority may also file a personality rights lawsuit in court for violations of the principle of equal treatment. It may do so when the violation in question or the impending threat thereof is based on a characteristic that involves an essential feature of an individual's personality and the violation or the immediate threat thereof affect an unspecified larger group of persons.

It was back in 2017 that the Authority received a report that there was a group of vans driving around in Budapest which showed nude female bodies surrounded by various types of basic foods. The Authority assessed that these advertisements violated the human dignity of women. Thus, the Authority launched a personality rights lawsuit in the competent court against the company that had chosen to advertise its transportation services in this way.

The Authority's assessment was that by portraying almost completely nude female bodies encircled by various types of vegetables and meat products, or other types of commodities, these advertisements had created a direct link between the female body and these products, which may give rise to an impression in those who behold these advertisements that the female body could itself be seen as a product of some kind. An important aspect of such a mental association was that the advertisements linked products to the female body that had otherwise nothing to do with it. At issue in this case were not lingerie advertisements or some dieting ads, but the transportation of meat, vegetables and other basic foodstuffs. Since the images displayed on the side of the vans showed roughly life-sized female bodies in a horizontal position, they were prone to evoke the impression that women were being transported in the vehicle, which was also liable to trigger or reinforce the mental association of the female body as a "transported good". The inscription above the image of women lying horizontally, which said We deliver your everyday ingredients! further intensified this effect. On some vehicles, this was exacerbated by the inscription "Meat products" just below the female body, which thus went further than the other advertisements in objectifying women's bodies as mere meat products, thereby degrading the entire female gender at the same time. The Authority assessed that the advertisements violated women's right to equal treatment and realised harassment as defined in the Ebktv's Section 10 against an unspecified larger group of women.

However, the Budapest Environs Regional Court did not share the Authority's assessment and dismissed the action brought by the EBH in its decision No. 22.P.20.485/2017/11. In its judgment, the court argued as follows: women play an essential role in advertising, and if a product is advertised with a beautiful woman then it sells; the models appeared in the advertisements depicting them based on their own free choice, as a result of the profession they had chosen; the impugned ads were not an advertisement for women but for certain types of products, the female bodies only served to elicit interest in the product; the method of portrayal that the Authority had complained actually precludes the mental association whereby the female body is degraded to a mere meat product; the depiction and sight of a beautiful female body does not imply that sexuality had been used.

The Authority disagreed with the court's reasoning and thus appealed the first instance decision, but the Budapest Court of Appeal as the appellate court ended up affirming the first instance ruling in its final and binding judgment 2.Pf.20.122/2018/5/II; it agreed that no behaviour violating human dignity had been realised by these advertisements.

In the meanwhile, the company in question had replaced the impugned advertisements with other advertisements that were in better taste and respectful of the human dignity of women.

International engagement

Just as in previous years, in 2018 the Authority continued its active engagement in the work of Equinet, the network of European equality bodies. We participated in the work of two Equinet working groups (Equality Law and Equality Policy), held presentations at the conference entitled Addressing poverty and discrimination: two sides of the one coin, and we attended a joint seminar organised by Equinet and the European Commission entitled Tackling discrimination and ensuring dismissal protection for carers in Europe. We were also represented at Equinet's regular annual assembly and the following seminar, which focused on ethnic profiling. We also shared data with Equinet on the latter subject as well as other issues, and we discussed our relevant experiences with other member organisations.

The president of the Authority attended a seminar hosted last year by the European Commission against Racism and Intolerance (ECRI), in which the participants looked at the ECRI's Recommendation No. 2 that had entered into effect during the previous year. An EBH staff member also attended a working group meeting organised by ERIO (European Roma Information Office) on the role of equality bodies in combatting discrimination against Roma in the areas of housing and healthcare. We were also present at the European Commission's gender equality seminar. All the jurists working for the Authority learned about the cases on this subject matter that the European Court of Justice and the European Court of Human Rights had adjudicated.

The Authority's president attended a technical consultation organised by the Office of the Commissioner for Fundamental Rights, which hosted a delegation of the European Parliament's Committee on Women's Rights and Gender Equality. We also welcomed two staff members of the Council of Europe's Human Rights Committee who were interested in our procedures in connection with discrimination on the basis of gender, sexual orientation and gender identity.

Communication and partnership

Sections 14 (1) (e) and (g) of Act CXXV of 2003 (the Ebktv) provide that as part of its public responsibilities, the Equal Treatment Authority must regularly inform public opinion and the Hungarian parliament, the National Assembly, about the effectuation of the principle of equal treatment. Raising public awareness about the principle of equal treatment and the applicable legal remedies is a legally enshrined responsibility of the Authority and the relevant responsibilities are performed by its Communication and Partnership Department. This unit of the EBH is responsible for making sure that the public is informed about the Authority's procedure and about the rights that are meant to provide protections against discrimination.

The Authority disposes over all the basic and necessary instruments of communication that it needs for the performance of its communications responsibilities, and its communication is well organised and coherent. The communication plan for 2018 outlined the Authority's communication strategy and the prioritised messages, and also specified the media and platform where these messages would be disseminated.

In line with the plans, the Authority's permanent messages, to wit "Everyone's entitled to equal treatment!" and "Turn to us when you experience discrimination!", have been at the centre of the Authority's communication and promotional activities in 2018. Both messages were disseminated through the most effective communication instruments available, in the form of animated films and a sign-language film.

The communication plan for 2018 defined the Authority's communications objectives as raising awareness about its public administration procedures, the dissemination of information about legal remedies against discrimination and the public promotion of the EBH's network of equal treatment consultants.

In addition to traditional forms of communication, we also relied on new instruments to realise our communication goals, such as a 30-second and a one-minute video clip as well as a sign-language film, along with the new volumes in the series of thematic EBH booklets. Other new methods of disseminating information that we introduced in 2018 were cinema advertising and the improved accessibility of our website designed for the Drupal content management system.

For the public promotion of the network of equal treatment consultants, we primarily relied on promotional tools aimed at young people, which also featured our logos. This was complemented by an online campaign designed to inform the public about the office hours and locations of the network's

consultants, which augmented and boosted the impact of traditional local information efforts by its staff.

In addition to those who were subject to discrimination, the primary target group of our communication services were those who are legally obliged to comply with the principle of equal treatment. The secondary targets identified by the communication plan were civil and state organisations, market players, international organisations and the representatives of academia whose work is aimed at combatting discrimination.

From a communications perspective, 2018 was the year of integrated campaigns. Our 30-second and one-minute video spots featuring the messages designated in the communication plan, which were created to reflect current trends in communication, reached over half a million concert and movie-goers and online users through cinema ads displayed in Budapest and rural areas, along with major concerts in Budapest and online campaigns. This year also saw the publication of the fifth volume of the thematic EBH Booklets, which is entitled Multiple discrimination in the Equal Treatment Authority's case-law.

The booklets in the series are all available on the Authority's website, and we are continuously working on distributing hardcopies as well. In 2018 we also began disseminating a study that had been finalised at the end of 2017, which was published as part of the Authority's research programme under the name Legal awareness about equal treatment. In addition to presenting the 2017 results, the research project also summarises the results of the foregoing two waves of research, which took place in 2010 and 2013, respectively, and it also includes a comparative analysis of the broader trends and tendencies that capture the general situation beyond the current state of affairs.

The sign-language film produced to inform about the fully accessible way to avail oneself of the Authority's procedure was posted on the EBH website in April.

Among our digital improvements, the most important was the reconstruction of the Authority's website, which put an end to our dependence on the website developers in terms of managing our online contents. Moreover, in line with the principle of uniform design, the upgrade finalised the framework for a fully accessible use of the website.

Visitors of our websites encountered 54 new cases summaries, 19 published decisions and 10 other news items involving the Authority and its work. In its news stream on the Authority's Facebook page, we informed readers about EBH cases in 36 posts. In addition to news items with international relevance, the Authority's digital platforms also offered access to two animated films and four thematic publications.

The most popular news item on the Authority's digital platforms generated over 26,000 views and 288 shares. The number of page likes on the Authority's Facebook page rose to 8,625. The Authority reported about its activities in 41 news items. The major challenge from a communications perspective is the fact that we had to simultaneously manage the reconstruction of our website and the responsibilities stemming from the changes in the data protection policies.

INSTRUMENTS OF INTERNAL COMMUNICATION

Internal communication is the instrument that allows the Authority to operate in manner that projects a coordinated and coherent picture of its work. It allows our staff to identify with the Authority's mission and objectives, facilitates the effective performance of our work and the internal flow of communication, shaping the Authority's external image and sustaining a high level of public trust in its work.

The Authority's staff participated in a three-day training in April. The assessment of the Authority's work by its president, the change management training and a presentation by the president of the National Authority for Data Protection and Freedom of Information (abbreviated as NAIH in Hungarian) provided the proper framework for boosting workplace cohesion and the presentation of specialised contents in the framework of internal training and communication. This internal deliberation also provided an important setting for the direct communication between the Authority's staff and the president of the EBH, the direct dissemination of information to the staff by the latter, as well as the opportunity for direct dialogue between the Authority's president and its staff in an environment that differed from the shared leadership model that characterises everyday operations.

From a communications perspective, regular consultations at the departmental level on given focal issues also qualify as internal workshops, as do international conferences and trainings aimed at disseminating relevant technical and expert information. The review of the process of the Authority's application of the law provides a regular framework for reflecting on and applying the insights gathered as part of that process.

Examples of joint activities outside work include the leisure events associated with the previously mentioned trainings, as well as the Equal Opportunity Race organised by FODISZ, the National Federation of Student Competitions and Leisure Sports for Persons with Disabilities, and the Rehab Critical Mass event, which the Authority participated in just as it has in foregoing years.

The functions of the legally mandated bulletin board which is used to disseminate public notices were expanded by a further feature, namely the use as an ad hoc "messaging board" for various invitations or other information about specialised and artistic events.

THEMATIC AND INFORMATION PUBLICATIONS

The educational curriculum about anti-discrimination law and the Authority's procedure

The educational curriculum developed by the Authority, which is entitled the Application of Act CXXV of 2003 on equal treatment and the promotion of equal opportunities is available on our website and is being continuously updated.

The accreditation of this curriculum in 2015 has made it possible to integrate training materials concerning the principle of equal treatment into the programme of further education in public administration. Completing these studies allows participants to earn credits according to the rules set out in law. However, for the time being access to this educational programme is still fairly narrow, it is limited to those who are employed in the central public administration's development policy units.

Even though compliance with the principle of equal treatment is mandatory in all public administrative legal relationships, compliance with this requirement is not actually being promoted either in education or in the adult further education system. That is why the Equal Treatment Authority initiated the integration of its curriculum on equal treatment into the educational programme of the entire further education programme in public administration and in higher education in general. The coordination of the accreditation process began in 2018.

Furthermore, as part of its educational and other of activities performed in the framework of knowledge dissemination, the Authority recommended its thematic events concerning the various areas of discrimination to state institutions that operate in the specific areas that the events touched on. The first project was launched in cooperation with school district centres and the specialised pedagogic services the activities of which pertain to the areas that two of the Authority's thematic publications in the EBH Booklet series address. Preparations for these events, which provide a framework for the professional dialogue between our institutions, have been finalised and the events will be realised in the first months of the coming year.

EBH Booklets

The Equal Treatment Authority launched this series of thematic publications in 2015, seeking to shine a light on issues of public interest. The goal of this periodical is to use specific cases investigated by the Authority to present a broader set of behaviours that run afoul of the principle of equal treatment, along with legal remedies and the methods whereby those who have experienced discrimination can assert their rights. The target audience are those who have suffered a disadvantage and those who are legally obliged to comply with the principle of equal treatment, that is employers and public service providers, trade unions and other organisations representing the interests of particular social groups, civil organisations, as well as anyone in the public with an interest in these issues. Through this specialised series the Authority wishes to help pre-empt and recognise discriminative behaviour, as well as to reinforce the awareness of rights and the spread of behaviours that comply with the law.

The first booklet in the series concerned the topic of workplace harassment, the second was published under the title Harassment in the area of education. We completed the third volume, The use of other situation as a protected characteristic in the Equal Treatment Authority's application of the law in March 2017, and in October of the same year we published the fourth volume with the title The experience of the Equal Treatment Authority with discrimination in the area of education.

Early in 2018 we also began distributing our booklets, which had previously been available only on the Authority's website, in print, in both Hungarian and English.

The fifth volume in the EBH Booklet series, is entitled Multiple discrimination in the Equal Treatment Authority's case-law, was published in 2018. This choice of topic was informed by the insight that the concept of multiple discrimination has been evolving dynamically in the case-work of European equality bodies and other international legal bodies, and it has also increasingly emerged as a focal point in the activities of international organisations. Moreover, the Authority also has relevant experience in this area.

The Authority regularly encounters cases in which the petitioners linked the grievance or grievances they had suffered to more than one so-called protected characteristic. There were also some cases in which the Authority itself assessed that the petitioner had been subject to a disadvantage for reasons also attributable to other protected characteristics than the characteristic or characteristics expressly referred to in the complaint.

The volume introduces the concept of multiple discrimination, which is relatively new in anti-discrimination literature. The discussion also extends to the various types of multiple discrimination. In the next step, our booklet proceeds to provide a historical overview and also looks at its evolution in European law. This is followed by an overview and analysis of the main features of the relevant Hungarian legal regulations and the Authority's application of the law in cases involving multiple discrimination. Finally, after this conceptual and historical overview, the booklet summarises nine examples from the Authority's case-law in which the petitioners were subject to more than one of the 19 protected characteristics defined in the relevant law.

Research study

In the first days of 2018 we uploaded our study entitled Legal Awareness of the Right to Equal Treatment onto the EBH website. The study, published in Hungarian and English, discusses and analyses the results of the EBH's 2017 research on legal awareness. The study also includes a comparative analysis of the results of two previous waves of research, conducted in 2010 and 2013, respectively, and uses these to infer long-term trends in addition to describing recent developments.

In light of the fact that there are no other ongoing and publicly available research projects that track changes in discrimination mechanisms, it is worthwhile to provide a brief overview of the studies' results and the analysis.

Starting in 2010, the EBH's research study focused on discrimination mechanisms in four areas of employment and two areas in public administration, respectively. A nationally representative survey with three consecutive waves also looked at practices that gave rise to discrimination in employment and in access to services, also exploring causal links, with a special focus on the experiences of the protected groups of women, Roma, and persons with disabilities.

Between 2010-2013, we found a significant surge in the legal awareness of Roma women, compared to both Roma men and non-Roma women. This simultaneously reflected a special form of multiple discrimination, namely intersectionality, which occurs when instances of discrimination based on two or more protected characteristics are inseparably intertwined. (The fifth volume of the EBH Booklet series published in 2016 also reflected on these research findings).

The third wave of the research in 2017 updated the key indicators and looked at the long-term trends. The survey of discrimination trends between 2013-2017 revealed that the share of cases involving men as the victims of discrimination exhibited the most conspicuous growth. An analysis of the research data showed that there was a surge in the legal awareness of discrimination among Roma men – which emerged with some delay when compared to the surge previously experienced among Roma women –, and this manifested itself in the form of a conspicuous growth in the number of cases in which the protected characteristic cited was ethnicity and skin colour.

Another striking result that emerged from the data was that all groups with protected characteristics showed an increase in perceptions of discrimination, and one of the new trends we observed was that cases in which financial situation and social origins were cited as protected characteristics have emerged as the most dynamically growing category of discrimination cases.

From the perspective of the Authority's strategic approach, a key objective of the research project's analysis of the public's legal awareness was to map those ongoing processes that could orient the Authority's institutional strategy aimed at reducing discrimination and shaping societal perceptions.

All of the volumes published as part of the Authority's research programme are available for download on the Authority's website. In addition to the third wave of the research, this also includes the results of the previous 2010 and 2013 surveys. The distribution of the Hungarian and English-language print publications that feature this analysis was also performed in 2018. We disseminated these volumes to the public through the free shelves of university libraries and other locations.

Public relations

The Equal Treatment Authority's media presence became more pronounced and its public visibility increased as a result of a comprehensive national media campaign organised in 2013. That was the year when public awareness of the Authority, the legal remedies it offers and its procedure directed at protecting human dignity increased substantially and they have remained consistently high ever since. An analysis of the campaign and its impact showed that among the complex set of communication instruments at our disposal, the impact of visual communication is most pronounced in terms of raising awareness about preventing discrimination, protecting human dignity and promoting an awareness of rights as well as compliance with the principle of equal treatment.

In line with these insights, we typically relied on visual instruments as the centrepieces of our 2018 media campaign as well.

Promotional information videos

In 2018, the Authority's president decided on the production of videos designed to promote the EBH's institutional image based on the results and insights of the 2013 image campaign. We opted for animated short films as the best method for introducing the Authority's work to the public and to raise awareness about the

EBH. The films are designed to effectively reach their target groups, including youths in secondary education, university students and young adults.

The films under the working title Assembly Line (Futószalag in the original) and Countdown (Visszaszámlálás) were produced in the first quarter of 2018 and are still available on the Authority's website and Facebook page.

The Authority also relies the instrument of film to inform various segments of society about its public services. The goal is to use visual experiences to project a positive and confidence-inspiring image about the Authority to the public, to raise the EBH's prestige and promote the public's awareness of its work. Because of their technical parameters, film as an instrument of communication provides equal access to its contents. Furthermore, the lengths of our films are tailored to reflect the user experiences that are typical in social media communications, and they were also designed based on the insight that they would be predominantly disseminated in the form of cinema advertising. In line with the communication plan, as the first step we uploaded the films to the Equal Treatment's Authority website and Youtube channel, and then as part of the accompanying promotional campaign we also disseminated them on the Authority's Facebook page and in the form of sponsored advertisements. During the campaign period, the film generated 168,000 views, 283 shares and 78 comments.

Sign-language film about using the Authority's services

The Authority's website was developed based on the principle of universal design and following the WCAG 2.0 standard. Based on the aforementioned, equal access is ensured through an AAA-level development. As part of the feedback that the Authority received in the context of making the website more user-friendly for groups with protected characteristics, an organisation representing people with hearing impairments indicated the need for using sign-language in filling out the form used to initiate the Authority's proceedings.

The film was produced in cooperation with one of the county-level interpreting services of the National Association of the Deaf and Hard of Hearing (abbreviated as SINOSZ in Hungarian). In addition to providing sign-language interpretation, the organisation's representative also assisted in making the information more intelligible to the public.

The film was completed during the first quarter of 2018 and it now helps hearing-impaired clients to avail themselves of the Authority's legal remedy procedures through its website.

Website

The Drupal-based website developed in 2018 ended the Authority's previous dependence on the website developers and improved the quality of accessible website navigation, while it also added new functions and introduced an easy-to-use website administration system.

In a review of the electronic platforms of state institutions and courts from an accessibility perspective, NGOs awarded the Authority's website a high score. The English-language website is being continuously expanded and the contents of the app are also constantly updated.

The animation films were placed on the homepage for a prolonged period of time, and the contents of the website were promoted with the help of two online campaigns in 2018.

Among the consistently used design elements of the Authority, the images used as cover pictures and as index pictures for the public dissemination of the Authority's case-law are specifically aimed at drawing the viewer's attention and to chip away at the distancing stereotype that is generally associated with public authorities. Moreover, the texts of our contents are presented in a way that strives for more accessible language and greater public intelligibility to overcome linguistic impediments in accessing our contents.

Social media

The Equal Treatment Authority's Facebook page continues to be a platform with a wide public reach. The number of followers is growing at a steady rate and it has a particularly pronounced reach and high user satisfaction in the target group. Its design matches the design of the general appearance of the Authority's interfaces.

While the dissemination of information about the Authority's case-law remained dominant, the promotion of contents with an international relevance also become more typical.

Our online campaign was designed to promote the info videos concerning our activities and to steer users to the online interface that features our case-law.

Similarly to the EBH Booklets,, the Frequently Asked Questions (FAQ) section covers specific thematic legal areas based on the Authority's case-law rather than the EBH's procedure in general, focusing for example on issues such as kindergartens and schools; assistant dogs; cases in which the regular legally enshrined exceptions that could be used to justify the underlying differential treatment do not apply; pregnancy – and with this method it attains a significant user reach even without a paid campaign.

Integrated campaign

The animation films were at the centre of the campaign recommended by the communication plan, they shaped the design and the style of our broader campaign.

Cinema

A new and previously unused campaign element in the Authority's communication is cinema advertising, which was realised with the screening of the films with the working title Assembly Line and Countdown, both of which were produced in 2018. The films were screened in rural and Budapest-based cinemas affiliated with the Cinema City and Budapest Film companies, as well as at the events of the Budapest Park in the capital, on giant projectors and desktop computers. The animations were screened in the politics-free media environment of film theatres and multiplex cinemas in July and August, outside the period of intense media noise. In terms of value for money, the campaign was a realistic choice for the EBH, reaching an audience of 272,308 persons.

For the time being, cinema advertising is the only form of advertising that the majority of people enjoy watching, which is why such advertising holds out the possibility of implementing creative ideas, where the message of the ad reaches viewers in a positive atmosphere. This is also where one is likely to encounter the target audience of the Authority's campaign, since 83% of cinema-goers are between the ages of 18-49.

Print and online press

In line with the recommendations in the communication plan, offline and online press appearances were realised in response to press requests, primarily in the context of cases that were in the focus of public attention and more generally with respect to the services of the equal treatment consultant network. There were no paid advertisements due to high prices of advertising. In light of the fact that the Authority only comments on cases that have been concluded by a final and binding decision, while the media tend to seek immediate information on pending cases, the Authority's ability to avail itself of this instrument of communication is limited.

Outdoor posters

The outdoor posters are used by the consultant network across the entire country. The creatives are used to inform the public living in the various Hungarian counties about the office hours and personal consultations offered by the equal treatment consultants. By displaying these constantly in various communal and public places, they also offer the possibility of promoting the Authority's information campaign. Their visualisation is based on the creative materials of the EBH design; a representative survey from 2016 showed that the approval, activisation and stimulation values associated with these design elements substantially exceeded the average measurable impact of outdoor posters featuring public interest notices.

The posters were on display in all major towns with a county-level status and other ridings that offer venues where equal treatment consultants meet with clients, in public institutions with significant client traffic. The posters informed about the legal remedies available through the Equal Treatment Authority's procedure and the locally available services with respect to cases of discrimination.

Events

The Authority typically performed its promotion activities at major public events in the summer and featured the involvement of equal treatment consultants, including speeches, presentations and onsite personal consultations, as well as the Authority's own stands at these events. In the majority of counties, these took place at local events, typically more than once. Most of these events involve groups with protected characteristics, youth enrolled in education as well as the general public. As a result of the partnerships that have been built

over the previous years, the organisers appreciate and welcome the presence of the county-level equal treatment consultants.

In combination with the distribution of our specialised publications and the promotional items featuring the EBH logo, these encounters with wide swathes of the local public substantially enhance public awareness of the Authority and the effectiveness of our efforts to convey basic information about the EBH.

In addition to such major events, the consultants in the county-level consultant network also participated at numerous other county events where they offered presentations discussing, among other things, local/regional data concerning the EBH's activities and case-law.

We also attended the FODISZ and Rehab Critical Mass events with the Authority's staff in 2018 and used promotional items to raise awareness about the Authority's operations and the prevention of discriminatory practices.

Satisfaction survey among EBH clients

The EBH performed a client satisfaction survey in 2018 among its clients in the counties as a quality assurance mechanism to assess the services of the Authority and the county-level equal treatment consultants. As part of this survey the clients discussed their experiences with the Authority in the context of cases that have been concluded by the Authority's decision. These clients therefore have an overview of the entire process of the Authority's procedure.

In 2018 the satisfaction of clients who had availed themselves of the services of the county-level equal treatment consultant network was performed online. This survey, which was aimed at persons with access to the internet, resulted in a higher level of awareness than we had previously observed with the paper-based survey and resulted in impressive figures that demonstrated the necessity, recognition and embeddedness of our services and the high levels of client satisfaction with these services.

In order to track the client satisfaction data over the years, we have published the current data along with the previous years' values on the Authority's website at egyenlobanasmod.hu.

In summary, among other things the following were realised as part of the institutional communication:

- publication and distribution of the Authority's report for 2017
- the distribution of EBH booklets Nos. 1 through 4
- printing and distribution of EBH booklet No. 5
- distribution of the Authority's research publication
- production of promotional films
- the post-production work on the sign-language film and its uploading onto the website
- the upgrading and renewal of our website (end of the dependence on the developer)
- full update of the website
- uploading and reloading English-language contents
- online campaign and film promotions
- cinema advertising campaign in rural areas and in Budapest
- concert campaign and film promotion in Budapest
- coordination of the events hosted by the equal treatment consultants
- acquisition and distribution of items embossed with the Authority's logo
- 36 cases were published in the news stream/Facebook
- 54 cases were uploaded
- professional and promotional support for events hosted by the equal treatment consultants

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