Equality Impact Assessment Form

1. Document Control

1. Control Details

Title:	Electric Scooter (e-scooter) Rental Scheme Trial
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1	Anne-Marie Barclay	26 August 2020	
2	Rasita Chudasama	24 September 2020	
3	lain Turner	25 February 2021	
4	lain Turner	1 September 2021	

3. Contributors/Reviewers

Name	Position	Date
Rosey Donovan	Equality and Employability Consultant	3 rd September 2020
Rosey Donovan	Equality and Employability Consultant	18 th March 2021
Rosey Donovan	Equality and Employability Consultant	1st September 2021

4. Glossary of Terms

Term	Description
E-bikes	Electrically pedal assisted cycle or electric bike
E-scooter	Electric scooter (as defined by Department for Transport)
DfT	Department for Transport
Micromobility	Umbrella term encapsulating e-bikes, e-cargo bikes, e-scooters and
Wild officiality	other small forms of small powered vehicles e.g. segways.
DIG	Disability Inclusion Group
NCC	Nottingham City Council
RNIB	Royal National Institute for Blind People
BSL	British Sign Language
ITF	International Transport Forum
NHTS	National Household Travel Survey
CPO	Community Protection Officer

2. Assessment

1. Brief description of proposal / policy / service being assessed

In March 2020 Nottingham was named one of the Government's Future Transport Zones to deliver a range of measures to support the take up of new mobility services, which includes the delivery of a series of electric mobility hubs to provide access to a wide range of transport services. In the longer term this would include options to hire e-scooters alongside shared ebikes for use by the public.

As part of the recovery response to Covid-19 the Department for Transport (DfT) has made regulatory changes to enable e-scooters to be used on public roads, utilising the same road space as cycles. The trial e-scooters are only legal on public roads. It is illegal to ride on the pavement.

The regulatory changes only apply to DfT approved rental schemes (privately owned scooters will remain illegal on public roads) for the trial period, and all participants must be 16 years or older and hold a valid driving licence. A dual validation process is required as authentication to be approved for the scheme through the Wind Mobility Smartphone App.

Having selected an operator through a competitive procurement, the Council granted approved for the e-scooter rental scheme as an affordable and green commuting option. This commenced on 27 October 2020 and comprises of long term (monthly rentals) for key workers and short term hire (pay per minute) for the general public. Eligibility for the long term trial is limited to city residents who work or study in the city. Visitors and the general public benefit from the short term hire element. In particular, support from both the University of Nottingham and Nottingham Trent University has been received as e-scooters will help staff and students travel within and to campuses across the city. Thus far 750 e-scooters have been introduced on the pay per minute scheme with a further 60 long term e-scooters on hire.

Initially the trial period was for 12 months from the scheme start i.e. until October 2021. The Government have announced extensions to existing trials up to 31 March 2022. Trials are encouraged to participate but there is no compulsion. The Council proposes to extend the trial in line with Government proposals.

The e-scooter scheme provides an opportunity to gain further insight and understanding into the role e-scooters play in an integrated transport system, contribute towards the carbon neutral plan 2028 and to support our longer term aspirations for the Future Transport Zone programme.

2. Information used to analyse the effects on equality:

There are many potential benefits from micromobility vehicles including: offering an alternative means of transport to those who would usually drive a car; offering a low cost alternative to people on low incomes; providing a potential alternative means of transport for some people with disabilities or who are less able to get around; environmental benefits of vehicles that are green at the point of use; potentially reduced congestion; and the ability to integrate with other modes of transport.

However, there are also safety risks to consider. Any vehicle being used on the road presents a risk both to the user and to other road users, particularly vulnerable groups such as cyclists and pedestrians. Safety remains of utmost importance and ensuring this is the key purpose of the local trials to understand the impacts of e-scooters.

Given their newness, there is little robust data on the impacts of e-scooters. In order to fully understand e-scooter safety, and to determine the best regulation for their use, the DfT are encouraging trials of rental e-scooters. The trials are providing data on whether e-scooters are physically robust and safe by design, whether users have the skills to use them safely, and how e-scooters interact with other vehicles, road users and pedestrians.

The DfT published guidance for local authorities and operators with details on the conditions of the trials. This includes setting a national definition of an e-scooter and amendments to legislation to permit their use on the public highway. Further information is available online here: <a href="https://www.gov.uk/government/publications/e-scooter-trials-guidance-for-local-areas-and-rental-operators/e-sco

Privately-owned e-scooter usage on the highway remains illegal.

There is little robust data on the equalities impacts of e-scooters. Gathering evidence of this is part of our justification for trialling e-scooters. Reference has been made to a Government consultation on e-scooters, published reports and feedback from key stakeholder groups in the development of this Equality Impact Assessment.

Government consultation on legalising e-scooters

Government held a consultation on legalising rental e-scooter trials from 18 May to 2 June 2020. Responses to this consultation, and stakeholder meetings that took place at the time of the consultation, provide some evidence of the impact of e-scooters:

- Groups representing disabled people mentioned that while e-scooters could offer an alternative means of transport for some disabled people, e-scooters are likely to have a potentially negative impact on deaf people, and blind and visually impaired people. Their representative bodies raised three key concerns: that e-scooters are dangerous as they cannot be heard; that discarded or badly parked rental scooters can be an obstruction or cause injuries; and that e-scooters should not be allowed on the pavement under any circumstances. Failure to address these issues could discourage visually impaired people from travelling or leaving the house. Further information on the consultation is provided here: <a href="https://www.gov.uk/government/consultations/legalising-rental-e-scooter-trials-defining-e-scooter-and-rules-for-their-use/legalising-rental-e-scooter-trials-defining-e-scooter-and-rules-for-their-use/legalising-rental-e-scooter-trials-
- Some respondents, including some local authorities, expressed concern about potential impacts around race for the requirement
 that e-scooter users taking part in the trials should hold a driving licence. Government figures on the number of people over 17
 holding a driving licence (https://www.ethnicity-facts-figures.service.gov.uk/culture-and-community/transport/driving-licences/latest) shows that:
 - o between 2014 and 2018, an average of 74% of people aged 17 years and over in England had a driving licence;
 - o 76% of White people had a driving licence (the highest percentage out of all ethnic groups);
 - o 52% of Black people had a driving licence (the lowest percentage of all ethnic groups).

Reports

The following are examples of research reports on micromobility and e-scooter use that demonstrate potential impacts around age, disability, sex and race.

An ITF report into Safe Micromobilty published in 2020 (https://www.itf-oecd.org/safe-micromobility) provides evidence of differences for some protected characteristics:

- The majority of cyclists in car-oriented cities are young to middle-aged males. In bicycle-friendly cities, however, cycling is inclusive with a larger share of women, children and seniors (Garrard et al., 2012).
- Youth and lack of experience have a compound effect on crash risk. This was observed among novice car drivers: the crash rate
 of older novice drivers is lower than that of younger ones (Curry et al., 2017). Underlying factors contributing to this risk for young
 drivers are immaturity, lack of experience, impairment, and lifestyles associated with their age and gender. Young drivers engage
 more frequently in high-risk situations such as night-time driving and driving older cars with fewer safety features (European
 Commission, 2015).
- In many countries, especially those with an ageing population, there is a growing awareness of the need to preserve pavements for the near-exclusive use of pedestrians. The fear of having to share pavements with powered vehicles deters some people, especially older people, from their rightful use of public space (Cheng, 2019).

An NHTS report on micromobility (little vehicle) use in urban areas from 2017 (https://transportfindings.org/article/10777-shedding-nhts-light-on-the-use-of-little-vehicles-in-urban-areas) shows:

- Little Vehicles (LV's) are mostly used by young men. Men were twice as likely as women to report a trip using an LV. This finding is consistent with other studies that showing women's rates of bicycle use are less than men's, largely attributed to feeling less comfortable cycling in risky traffic environments
- Adults aged 18–50 were more likely than other adults to report using an LV on the travel day.
- There are some statistically significant differences in some of the demographics of LV users; e.g. at the 90% confidence level, men were more likely than women, and young people were more likely than older people to report using an LV on the travel day.

A Populus report on the 'micromobility revolution' (https://medium.com/populus-ai/the-micro-mobility-revolution-95e396db3754) showed more women reported a positive perception of scooters (72 percent) than men (67 percent). Populus's data also indicates that women might be adopting e-scooters more quickly than they have bike-sharing.

Local stakeholder feedback

Discussions about the rental trial are regularly held with a number of stakeholder groups. Their feedback on e-scooters is summarised:

• Department for Transport (DfT) - Nottingham City Council has been in regular (weekly) contact with the micromobility unit within DfT since May 2020. Updates on issues and experiences from the other Live Trial areas is shared with the Council who has made all reasonable attempts to incorporate learning into the design of the local trial. Evidence from the DfT equality impact assessment has also been incorporated into this assessment.

- Wind Mobility regular meetings are held with the e-scooter operator as part of managing the service contract. Any issues arising from the trial are raised and Wind are obliged to suggest improvements to the trial wherever reasonably possible.
- Disability Inclusion Group Concerns have been raised around e-scooter use on pavements and in pedestrian areas. Actions are
 underway to mitigate these through the local design of the scheme and by publicising the customer services contact details clearly.
 Key actions have included increased communications to educate riders of the rules, the introduction of number plates, increased
 patrols in hotspot areas using Wind patrollers and the introduction of a three-strike policy for inconsiderate and irresponsible
 behaviour. Exploration of a smartphone App which alerts vulnerable members of society of the location of e-scooters is in discussion
 with the operator and App developers.
- Greater Nottingham Cycling and Walking Advisory Group concerns surrounding the speed of the e-scooters, lack of indicators, opportunity for modal shift and road condition potentially causing hazards for riders were raised. These have been factored into the risk assessment (available online) or mitigated through the design of the local scheme.
- Nottinghamshire Police and Nottingham City Council Community Protection these partners have identified the need for a joint
 working protocol so that all the key parties can work collaboratively in the event of accidents, abandoned vehicles, theft and crime.
 These working practices were established before the trial commenced and joint work is ongoing. For example at a previous partner
 meeting the risk around drink driving was highlighted which could have become an issue as the night time economy reopened.
 Further exploration to help mitigate this risk was explored ahead of the reopening timeline.
- Other local authorities and trial areas some trial areas commenced in July 2020 and have provided vital insight and learning through 'teething' problems experienced elsewhere associated with the introduction of a brand new mode of mobility. Common themes have centred round driver licence checks, pavement riding/riding in areas where there is conflict with pedestrians and capacity of operators providing on street visibility as the trials commence. Key learning (coordinated by the DfT) has disseminated recommendations to local authorities and operators to address these points through improved software/processes for licence checks, ensuring training/education/information is being widely provided and publicised, and ensuring trials start small and grow thereafter to enable the appropriate resourcing capacity is in place to respond to issues. The Council has ensured the operator grows the size of the fleet slowly and resources are in place to manage the fleet through regular weekly meetings with them.
- RNIB RNIB guidance to local authorities has been shared with the Council and the operator. Key aspects were either addressed via the procurement exercise or are being factored into the set-up of the scheme, including training and education materials.

In summary, some of the key learning points of the trial thus far and elements to ensure equality impacts are addressed include (but are not limited to):

• Provide physical markings for e-scooter parking areas to enable correct and tidy parking of e-scooters. A highways and road safety assessment process has been established and no new parking spot will be activated until their advice has been received. Parking fines are also in operation for users that abandon e-scooters outside of these mandatory parking spots.

- Measures to tackle pavement riding including the introduction of Wind street patrollers to monitor hotspots, a three-strike disciplinary process for users who ride irresponsibly and joint work with the Community Protection team to target hotspots areas.
- Operator led improvements including reducing the parking radius for more precise drop offs, introduction of fines and penalties e.g. lost helmets/abandoned e-scooters, rider conduct messaging to users via the App, text/email, information tickets/contact information added to each e-scooter as well as number plates.
- A complaints handling procedure is in place for reporting of issues directly to the operator. In addition, the Council facilitates a stakeholder network where progress on the trial is shared and feedback from interested parties invited to discuss emerging issues, actions and learning.
- Broad communications activities to promote the use of the scheme, including a dedicated webpage on the Council's Transport Nottingham website www.transportnottingham.com/escooters which hosts key information, regular news pieces/blogs in addition to social media content and videos.
- Provide a programme of safety events, educate riders of how to ride safely and how to pay particular attention to the needs of other
 road users. This will be communicated in face to face ride events (where possible) e.g. long term riders be given familiarisation
 training at handover, and pop up safety events at workplaces, city centre, universities will provide one-to-one or group training
 education. As Covid-19 restrictions have now eased the operator will develop a programme of familiarisation/training events to be
 delivered over the extend 6 month period.
- Monitoring of usage the operator regularly shared data with the Council to assist in the monitoring of the scheme. Funding has
 been secured from Government to carry out an evaluation of the trial to understand attitudes and perceptions amongst users and
 non-users and of the trial itself. The Council has also partnered with an academic partner to carry out a local evaluation of the trial
 involving surveys from users and non-users to aid local understanding. This report once published in spring 2022 will be shared
 with Government and be made publically available.

3. Impacts and Actions:

	Could particularly benefit X	May adversely impact X
People from different ethnic groups.		
Men		
Women		
Transgender people		

Disabled people or carers.	
Pregnancy/ Maternity	
People of different faiths/ beliefs and those with none.	
Lesbian, gay or bisexual people.	
Older	
Younger	
Other (e.g. marriage/ civil partnership, looked after children, cohesion/ good relations, vulnerable children/ adults).	
Please underline the group(s) /issue more adversely affected or which benefits.	

How different groups Details of actions to reduce could be affected negative or increase positive impact (or why action isn't possible) (Summary of impacts) People from different ethnic groups • Black and Minority Ethnic groups are less likely to have a To be eligible for a driving licence, people must be 16 years or over and can apply at www.gov.uk for a provisional licence online driving licence. for £34 and the Government changes remove the need and cost • People from Black, Minority Ethnic backgrounds could be employed in key worker roles. for training or taking driving tests to use an e-scooter. • 1,000 e-scooters will be offered for free hire to eligible key Language barriers could result in some citizens from Minority Ethnic backgrounds not participating in the trial. workers. Online form to allow for all eligible key workers to apply for the long term offer. There could be a benefit to Black, Minority Ethnic groups as the scheme offers an affordable option for travel. • Promote the scheme through Council channels, via the operator and via employer networks – there will be a dedicated webpage at www.transportnottingham.com/escooters

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- Evidence suggests men are more likely to take up the option so there could be an increased impact on their safety as a proportion of riders potentially involved in incidents.
- There could be a benefit to men as the scheme offers an affordable means of travel.

• Provide safety education and training to all participants.

<u>Women</u>

- Women could perceive e-scooters as unsafe therefore attracting lower usage.
- There could be a benefit to women as the scheme offers an affordable means of travel.
- The key worker offer could attract more long term usage amongst women who may be employed in key worker roles.
- Promote confidence building events and training opportunities to reassure women of the rideability of e-scooters and durability.
- 1,000 e-scooters will be offered for free hire to eligible key workers. Build an online form to allow for all eligible key workers to apply for the long term offer.

Transgender people

The trial will have no impacts in relation to gender reassignment.

N/A

Disabled people or carers

There could be a mixed impact amongst this group:

- Some people with disabilities may benefit from using an escooter if they have difficulties walking, however this must be balanced with the need to stand during the ride.
- Possible concerns are that users will ride through high trafficked pedestrian areas at speed or ride on pavements.
- Those with sight or hearing loss may not be able to see or hear them whilst they are being ridden.
- It is possible that users park e-scooters at places on their kickstands. These can then be knocked over, where it can then be a hazard to blind and partially sighted people.
- Parking on pavements or littering could cause obstructions therefore potentially causing injury.

- In line with DfT requirements, the maximum speed is capped at 15.5mph (the same as an ebike). Geo-fencing will be used to ensure e-scooters can only be used within the approved operating area. This technology also allows for speed to be reduced in high pedestrian areas or, to prohibit their use in some areas e.g. sensitive streets.
- The e-scooters are branded with a bright colour of vehicles, and as required by DfT are fitted with horn and lights to help with visibility.
- Designated parking areas are to be created to reduce the impact of e-scooter parking with other road users. Design options are to be developed with the operator.
- Information needs to reinforce the message that e-scooters should not be used on the pavement (except in shared cycle/pedestrian space). The Council has put in place an Experimental Traffic

- Regulation Order to permit the use of e-scooters on the highway and in other areas where cycles are allowed e.g. through no entry points.
- Joint working with the Police and Community Protection to help to establish partnership working arrangements and discuss the Nottingham operating model.
- It is crucial that training and education underpins the trial to ensure safe and appropriate riding from all users.
- Other trial areas are experiencing common issues and so learning from others can also potentially benefit the local scheme.
- Improvements to allow appropriate customer complaint processes so that people can raise issues/feedback to inform the way the trial is delivered.
- Following monitoring and feedback further measures were put in place to tackle issues arising:

Parking

- Physically marking out 350 parking areas in the city. Previously parking locations were only virtual. Many parking locations have been moved from original spot following citizen feedback.
- Reduced parking radius at a number of locations for precise drop offs
- Launched and increased the number of E-scooter patrollers going round hot spot routes and parking locations to minimise the impact of poor e-scooter parking.
- A flat fee of £7.50 has just been introduced for E-scooters that are incorrectly parked.
- Increased communications and videos to e-scooter users through the app, social media and other channels on rider conduct as well as rolling out info stickers user showing expected user conduct, including correct parking.

The issue still persists and Wind and NCC will continue to do make improvements to ensure pavements are safe for all users.

- Any long term scheme would also look at docking infrastructure in some locations as well as consultation with local residents.
- Wind Mobility working with app developer on potential app for visually impaired.

Pavement Riding

- Six Wind E-scooter patrollers are monitoring hotspot routes, engaging and intervening with users including handing out penalties to users who are caught riding on pavements.
- CPOs have engaged in a number of Action Days at hot spots to engage with e-scooter riders
- Rider conduct (including where and where not they can be used) is repeatedly communicated to users via the app, via text/email, social media and other media channels.
- Three-strike disciplinary process was launched to combat poor rider behaviour
- Information stickers reminding users of 6 do's/do nots that riders are expected to abide by will be on each scooter.
- We are also monitoring technology developments which will detect when a scooter is being used on the pavements. Some scooters with this technology are being launched in trials now and well monitor closely how it works.
- Upcoming in person rider clinic events and training
- Number plates added to scooters for identification of riders Private e-scooter ownership increases
- Communications shared advising the current legality of private escooters
- Retailers contacted to ask for further clarity on the legal status of private e-scooters at the point of purchase.

Pregnancy and maternity

- Pregnant women or those with young children may experience similar concerns as raised by disabled groups in relation to escooters in pedestrianised areas and on pavements.
- Mitigation as above (disabled people and carers section).

 People of different faiths/beliefs and those with none The trial will have no impacts in relation to religion or belief. 	N/A
 Lesbian, gay or bisexual people The trial will have no impacts in relation to sexual orientation. 	N/A
 Older Some older people may not have mobile phones so will not be able to participate as smartphone is required to unlock the escooters. Similar concerns amongst older people may also be present in line with disabled people and pregnant women with respect to escooter riding in pedestrianised areas and on pavements. 	scooters. DfT is seeking to collect robust evidence and data from the trials to inform the permanent changes to legalisation. There may be exclusions for some in accessing the service due to issues
 Younger There are greater advantages for young people over the age of 16. Those under 16 are excluded from the trials by way of a DfT policy decision. There could be a benefit to those aged 16-18 and university students by providing an affordable means of travel. Added benefit of new skills and training opportunities in the escooter industry for young people. Higher "crash risk" amongst this group due to youth and lack of experience. 	 trials. Promote the scheme amongst local colleges and university networks and via social media. The operator commits to establishing a vocational training programme to support young people in learning about e-scooters. Ensure first time user training is provided, information and repeat

Other - cyclists

There could be potential conflicts amongst cyclists and e-scooters as there are with any two forms of transport. There is also a possible risk that e-scooter riders are subject to aggression from cyclists during the trial (due to the lack of awareness and "newness" of the mode).

Other - general public

 Given e-scooter rental schemes are a new and novel mode there could be a general lack of awareness and understanding amongst the general public leading to perceived fears

Other - e-scooter riders

As above, given their novelty, e-scooter users may not have an appreciation of the correct conduct and behaviour whilst using e-scooters e.g. with respect to parking in a manner that doesn't affect pedestrian desire lines or riding too eagerly which may lead to a perceived fear and/or near misses with other road users.

- The Council will promote the scheme, its purpose and where riders can use e-scooters as widely as possible. This could result in "share the roadspace" type education/information campaigns should they be necessary.
- Efforts have been made to engage with local cycling groups to aid understanding of the trial.
- All parties will continue to provide communications to raise awareness and educate riders and non-users of the correct use of e-scooters.
- The operator continues to provide information and penalties for incorrect behaviour to their users through the App (supported by their T&Cs). Information has been placed on the e-scooters to remind riders of the rules, supported by broader communications via the Council's transport channels. Additional communications resources are being recruited by Wind to carry out further engagement and communications work.

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4. Outcome(s) of equality impact assessment:	
□ No major change needed	☐ Adjust the policy/proposal
Adverse impact but continue	☐ Stop and remove the policy/proposal

5. Arrangements for future monitoring of equality impact of this proposal / policy / service:

Monitoring of the impacts on equalities is undertaken as part of the monitoring of the trial (performance, risks/issues and lessons). The EIA was first established when the trial launched in October 2020. The full EIA was then reviewed in February 2021 taking on board key learning points and improvements that had been implemented. The EIA has since been updated again (September 2021) in line with the proposed extension of the scheme to March 2022.

Continued engagement with the Disability Inclusion Group (DIG), Royal National Institute of Blind People (RNIB), Local Stakeholder including Police and Community Protection has been maintained since the beginning of the trial. A progress meeting took place in September with the DIG for further feedback on the trial. It was agreed that a regular meeting would be organised going forward.

Monitoring and collection of feedback is also ongoing. NCC have partnered Nottingham Trent University to carry out an extensive Monitoring and Evaluation report which will look at how the mode has been used, mode shift and impact on non-users. This will include in depth work with user and non-user focus groups.

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6. Approved by (manager signature) and Date sent to equality team for publishing:

Approving Manager: The assessment must be approved by the manager responsible for the service/proposal. Include a contact tel & email to allow citizen/stakeholder feedback on proposals.	Date sent for scrutiny: Send document or Link to: equalityanddiversityteam@nottinghamcity.gov.uk
SRO Approval:	Date of final approval:28/09/2021

Before you send your EIA to the Equality and Community Relations Team for scrutiny, have you:

- 1. Read the guidance and good practice EIA's http://intranet.nottinghamcity.gov.uk/media/1924/simple-guide-to-eia.doc
- 2. Clearly summarised your proposal/ policy/ service to be assessed.
- 3. Hyperlinked to the appropriate documents.
- 4. Written in clear user-friendly language, free from all jargon (spelling out acronyms).
- 5. Included appropriate data.
- 6. Consulted the relevant groups or citizens or stated clearly, when this is going to happen.

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7. Clearly cross-referenced your impacts with SMART actions.