

Equality Impact Assessment Form

screeintip-sectionA

1. Document Control

1. Control Details

Title:	Electric Scooter (e-scooter) Rental Scheme Trial
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2. Document Amendment Record

Version	Author	Date	Approved
1	Anne-Marie Barclay	26 August 2020	
2	Rasita Chudasama	24 September 2020	

3. Contributors/Reviewers

Name	Position	Date
Rosey Donovan	Equality and Employability Consultant	3 rd September 2020

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 other small forms of small powered vehicles e.g. segways.

[screentip-sectionB](#)

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 regulatory changes will only apply to DfT approved rental schemes (privately owned scooters will remaining illegal on public roads) for a 12 month period, and all participants must be 16 years or older and hold a valid driving licence. This change in legislation has provided the Council the opportunity to pilot an e-scooter scheme, which will provide an opportunity to gain further insight and understanding to support our longer term aspirations for the Future Transport Zone programme.

Having selected an operator through a competitive procurement, the Council is proposing to introduce an e-scooter rental scheme as a sustainable commuting alternative to the private car use, especially whilst social distancing requirements are

in place. This will comprise of long term (weekly or monthly rentals) and short term hire (pay per minute). Eligibility for the long term trial will be limited to city residents who work or study in the city. Visitors and the general public will 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. 550 e-scooters will be introduced at launch. The size and scale of the total fleet will be determined during the delivery phase, depending on uptake following agreement between NCC and the e-scooter operator.

[screenip-sectionC](#)

2. Information used to analyse the effects on equality:

Reference to and due regard to The Equality Act 2010, national guidance on Inclusive Mobility and Equality Impact Assessments carried out for highway improvement schemes; in particular for schemes featuring electric cycles.

There are many potential benefits from micromobility vehicles including: offering an alternative means of transport to those who would usually drive a car; 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. In addition, the current Covid-19 recovery plans could potentially see e-scooters as a substitute for 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 the introduction of trials of rental e-scooters. The trials will provide 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 have published guidance for local authorities and operating 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: <https://www.gov.uk/government/publications/e-scooter-trials-guidance-for-local-areas-and-rental-operators/e-scooter-trials-guidance-for-local-areas-and-rental-operators>

Privately-owned e-scooters will remain illegal.

There is little robust data on the equalities impacts of e-scooters. Gathering evidence of this is part of our rationale 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: <https://www.gov.uk/government/consultations/legalising-rental-e-scooter-trials-defining-e-scooters-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:
 - between 2014 and 2018, an average of 74% of people aged 17 years and over in England had a driving licence;
 - 76% of White people had a driving licence (the highest percentage out of all ethnic groups);
 - 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 Micromobility 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:

- LVs ['little vehicles'] 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 have been had 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 trials elsewhere has been 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.
- Disability Inclusion Group – Concerns have been raised around e-scooter use on pavements and in pedestrian areas. These will be mitigated through the local design of the scheme and by publicising the customer services contact details clearly. The invitation

for DIG members to attend an event to meet with the operator was made (with the inclusion of BSL interpreter) to learn more about the e-scooter and the trial.

- Greater Nottingham Cycling and Walking Advisory Group – concerns surrounding the speed of the e-scooters, opportunity for modal shift and road condition potentially causing hazards for riders were raised. These have been factored into the risk assessment or mitigated through the design of the local scheme. The invitation was also made to the group to attend a future event for a ride on the e-scooters.
- 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 will be established before the trial commences.
- Other local authorities and trial areas – some trial areas commenced in July 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 around 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.
- 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 and elements to ensure equality impacts are addressed include (but are not limited to):

- 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.
- The user terms and conditions (hire agreement) agreed with the operator to ensure all riders are aware of what is required of them and should any conditions of hire be broken, accounts could be suspended or revoked entirely. (In more serious cases the Police could issue fines or prosecute riders. Discussions are underway whereby the Police, Community Protection and the operator to work in partnership on the trial.
- Broad communications activities to be undertaken to promote the use of the scheme, including a dedicated webpage on the Council’s Transport Nottingham website www.transportnottingham.com/escooters
- A complaints handling procedure to be put in place and promotion of the process for reporting of issues directly to the operator to be undertaken. In addition, the Council will facilitate a stakeholder network which will share progress and invite feedback from interested parties.

- Monitoring of usage which will also involve local evaluation activities to understand attitudes and perceptions amongst users and non-users and of the trial itself in conjunction with the University of Nottingham. This will feed into DfT monitoring work at national level.

3. Impacts and Actions:

<u>screentip-sectionD</u>	Could particularly benefit X	May adversely impact X
People from different ethnic groups.	<input type="checkbox"/>	<input type="checkbox"/>
Men	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Women	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Trans	<input type="checkbox"/>	<input type="checkbox"/>
Disabled people or carers.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Pregnancy/ Maternity	<input type="checkbox"/>	<input type="checkbox"/>
People of different faiths/ beliefs and those with none.	<input type="checkbox"/>	<input type="checkbox"/>
Lesbian, gay or bisexual people.	<input type="checkbox"/>	<input type="checkbox"/>
Older	<input type="checkbox"/>	<input type="checkbox"/>
Younger	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other (e.g. marriage/ civil partnership, looked after children, cohesion/ good relations, vulnerable children/ adults).	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please underline the group(s) /issue more adversely affected or which benefits.</i>		

<p style="text-align: right;"><u>screentip-sectionE</u></p> <p>How different groups could be affected (Summary of impacts)</p>	<p style="text-align: right;"><u>screentip-sectionF</u></p> <p>Details of actions to reduce negative or increase positive impact (or why action isn't possible)</p>
<p><u>People from different ethnic groups</u></p> <ul style="list-style-type: none"> • Black and Minority Ethnic groups are less likely to have a driving licence. • People from Black, Minority Ethnic backgrounds could be employed in key worker roles. • Language barriers could result in BAMEs not participating in the trial. 	<ul style="list-style-type: none"> • 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 for £34 and the Government changes remove the need and cost for training or taking driving tests to use an e-scooter. • 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. • Promote the scheme through Council channels, via the operator and via employer networks – there will be a dedicated webpage at www.transportnottingham.com/escooters

<p><u>Men</u></p> <ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> Provide safety education and training to all participants.
<p><u>Women</u></p> <ul style="list-style-type: none"> Women could perceive e-scooters as unsafe therefore attracting lower usage. The key worker offer could attract more long term usage amongst women who may be employed in key worker roles. 	<ul style="list-style-type: none"> 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.
<p><u>Trans</u> The trial will have no impacts in relation to gender reassignment.</p>	<p>N/A</p>
<p><u>Disabled people or carers</u></p> <p>There could be a mixed impact amongst this group:</p> <ul style="list-style-type: none"> Some people with disabilities may benefit from using an e-scooter 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. 	<ul style="list-style-type: none"> 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

	<p>and in other areas where cycles are allowed e.g. through no entry points.</p> <ul style="list-style-type: none"> • 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. • Appropriate customer complaint processes to be established so that people can raise issues/feedback to inform the way the trial is delivered.
<p><u>Pregnancy and maternity</u></p> <ul style="list-style-type: none"> • Pregnant women or those with young children may experience similar concerns as raised by disabled groups in relation to e-scooters in pedestrianised areas and on pavements. 	<ul style="list-style-type: none"> • Mitigation as above (disabled people and carers section).
<p><u>People of different faiths/beliefs and those with none</u></p> <ul style="list-style-type: none"> • The trial will have no impacts in relation to religion or belief. 	N/A
<p><u>Lesbian, gay or bisexual people</u></p> <ul style="list-style-type: none"> • The trial will have no impacts in relation to sexual orientation. 	N/A
<p><u>Older</u></p> <ul style="list-style-type: none"> • Some older people may not have mobile phones so will not be able to participate as smartphone is required to unlock the e-scooters. • Similar concerns amongst older people may also be present in line with disabled people and pregnant women with respect to e-scooter riding in pedestrianised areas and on pavements. 	<ul style="list-style-type: none"> • Accept – a smartphone is essential to accessing and parking the e-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 such as these. • See also mitigation as above (disabled people and carers section).
<p><u>Younger</u></p>	

<ul style="list-style-type: none"> • 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 e-scooter industry for young people. • Higher “crash risk” amongst this group due to youth and lack of experience. 	<ul style="list-style-type: none"> • Accept – DfT standards exclude under 16s from participating in the 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. This will be promoted in due course through the Council’s website, educational establishments, Growth Hub etc. • Ensure first time user training is provided, information and repeat message prompts on safe riding is provided in the App, online and social media. • In addition, a programme of events, which will include test rides, one on one/group training, workplace safety and education days will be delivered over the year (which will be in addition to in App notifications) to ensure all users (not just the young) are familiar with the e-scooter controls and feel confident when riding.
<p><u>Other - cyclists</u></p> <ul style="list-style-type: none"> • 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). 	<ul style="list-style-type: none"> • 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.

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4. Outcome(s) of equality impact assessment:

<input checked="" type="checkbox"/>	No major change needed	<input type="checkbox"/>	Adjust the policy/proposal
<input type="checkbox"/>	Adverse impact but continue	<input type="checkbox"/>	Stop and remove the policy/proposal

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

The operator will attend monthly progress meetings and provide the council with quantified data outlining the number of users, number of trips, and ride duration. Performance monitoring reports will detail the number of complaints, accidents and near misses involving e-scooter users, which will be submitted on a monthly basis to the City Council. In the event that trends are identified within specific

locations, an action plan will be put in place to remedy areas of conflict between e-scooter riders and other road users. These will be monitored for change at subsequent progress meetings to ensure that issues are being resolved. Should a no-go or slow speed area need to be introduced or additional areas for designated parking, these can be added to the operational area map, and be live within a few hours.

During the trial the operator will be required to attend stakeholder meetings every quarter which will include representation from the Disability Inclusion Group, RNIB and other interested parties. These meeting will be minuted, with clearly defined and actions and timescales for resolution of any issues reported.

A local monitoring framework will be developed to undertake before and after surveys from e-scooter users and also survey non-users on their attitudes to evaluate the impacts of the local scheme. Arrangements are also in place between operators and the DfT for central data access to feed into national evaluation of all trials.

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

<p>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.</p>	<p>Date sent for scrutiny: Send document or Link to: equalityanddiversityteam@nottinghamcity.gov.uk</p>
<p>SRO Approval: </p>	<p>Date of final approval: 29/09/20</p>

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