

**EQUALITY IMPACT ASSESSMENT TEMPLATE**

#### SECTION 1:

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| **Title** | Rental E-scooter trial |
| What are you analysing?   * What is the policy/project/activity/strategy looking to achieve? * Who is it intended to benefit? Are any specific groups targeted by this decision? * What results are intended? | To participate in a London-wide trial for rental e-scooter scheme for 12 months, providing an alternative and greener transport modes for the people in Westminster and wider London area with the safety of individuals on our streets in mind. The trial will contribute to City of Westminster’s 2019-2040 City Plan objectives (S25, A), (S26.7) and (S26.8).   1. Supporting a sustainable pattern of development made by sustainable and greener modes of transport, reduces traffic and improves air quality. 2. Enabling people to lead healthier and more active lives, reducing capacity pressure on the highway and enabling more people to use the same road-space. 3. Mode-shift from motor cars, reduction of harmful emissions and improving air quality.   TfL, who will be the lead authority facilitating the trial on behalf of the 11 participating boroughs and their objectives are as follows:   1. Promote safety at the trial’s core and help to ensure operators meet strict minimum standards relating to vehicle design, vehicle maintenance, parking, customer education and training; 2. Achieve a consistent approach across London (improving upon the experience of dockless bikes, which created a patchwork of different approaches), including in relation to street clutter, access across different socio-economic groups and enforcement issues; 3. Provide the data to understand how e-scooters might impact the achievement of the Mayor’s Transport Strategy (MTS), as well as helping to inform the DfT’s consideration of whether to provide a statutory basis for e-scooters to be used in England, Scotland and Wales, following the trials; 4. Provide the Mayor with the platform and evidence to request any city-wide powers that might be needed in the longer term to manage e-scooter use; and 5. Provide a potentially green and sustainable alternative to private car and capacity restrained public transport (including on Transport for London’s Road Network (TLRN)) to support coronavirus pandemic restart and recovery work. Along with these wider project objectives, TfL have prepared data and evidence gathering around six detailed learning objectives:    * To explore and understand the appropriate e-scooter operating standards, safety standards, environmental standards, regulations and city-level management powers required to ensure they benefit e-scooter users as well as [society] as a whole, and feed this insight gleaned through data collection into the DfT ahead of any changes to relevant legislation;    * To understand the impact of e-scooters on air quality and demand for travel by car, walking, cycling and public transport as well as where e-scooters can enhance transport options and complement existing public transport;    * To establish the changes in infrastructure required (if any) for rental e-scooter schemes to deliver a safe and attractive environment on our streets;    * To understand user and non-user reaction to e-scooters, their attitudes and perceptions;    * To understand the commercial viability of rental e-scooters in London, determine any areas of market failure including inequality in access and to understand the total cost of impacts for London Boroughs and TfL; and    * To understand how e-scooters might support ongoing restart and recovery objectives by providing a relatively green alternative to both private car and capacity restricted public transport, as part of London’s wider re-opening following the coronavirus pandemic.   This mode of transport could benefit groups who are more at risk of hate crime on the public transport network as e-scooter can benefit groups who prefer to travel independently yet do not have access to a cycle/or are unable to walk/cycle.  The scheme is a completely new transport mode offering and can assist in mode-shift and changes perception in micro-mobility in transport for anyone who hold the relevant driver’s licence and has the potential to reduce private car use and provide alternative mobility transport option to the public transport network.  Extensive data will be collected throughout the trial to help assess whether micro-mobility of this kind should be legalised in the UK as part of a long-term policy review by the Government.  The pilot will help better understand if and how these vehicles can be safely accommodated on London’s Streets. By collecting a robust evidence base on safety and other impacts caused by e-scooter uses. |
| Details of the lead person completing the screening/EIA | 1. Full Name: Steve Tse / Mohannad Tadros   (ii) Position: Transport Officer  (iii) Unit: Environment & City Management  (iii) Contact Details: [stse@westminster.gov.uk](mailto:stse@westminster.gov.uk)  mtadros@westminster.gov.uk |
| Date sent to [Equalities@westminster.gov.uk](mailto:Equalities@westminster.gov.uk) |  |
| Version number and date of update | 1. – 11/01/2021   1.1 – 06/06/2021 |
| *You will need to update your EIA as you move through the decision-making process. Record the version number here and the date you updated the EIA. Keep all versions so you have evidence that you have considered equality throughout the process. However only the most updated version will be saved in the Equalities SharePoint folder.* | |
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# SECTION 2: Do you need to complete a full Equality Impact Assessment (EIA)?

Not all proposals will require a full EIA, the assessment of impacts should be proportionate to the nature of the project/policy in question and its likely impact. To decide on the level of detail of the assessment required consider the potential impact on persons with protected characteristics.

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| **2.1** | | **Please provide an overview of who uses/will use your service or facility and identify who are likely to be impacted by the proposal**   * *If you do not formally collect data about a particular group then use the results of local surveys or consultations, census data, national trends or anecdotal evidence (indicate where this is the case). Please attempt to complete all boxes.* * *Consider whether there is a need to consult stakeholders and the public, including members of protected groups, in order to gather information on potential impacts of the proposal* |
|  | | |  |  | | --- | --- | | How many people use the service currently? What is this as a % of Westminster’s population? | N/A – this is a new service and currently uses of any e-scooters in London is illegal, only DfT type-approved vehicles are permitted to be used on the roads. There is no data to reflect the number of users on privately-owned e-scooters as these remain to be illegal and unregulated.  **Potential positive impacts - Evidence**  The approach TfL is taking is positive for London as opposed to the alternative which would involve multiple fragmented schemes:  Principally, the approach TfL are adopting will allow a co-ordinated single rental e-scooter trial across London which promotes safety and accessibility at its core and a consistent approach with participating boroughs. If TfL chose not to be involved there would be a fragmented approach to rental e-scooter trials in London with no consistency which could have led to numerous safety issues. Multiple stakeholder groups including TfL’s Independent Disability Advisory Group (IDAG), Trust for London and Rolltech.uk have positively supported the approach TfL proposes to take towards a rental e-scooter trial in London which is to work together with London Councils and the participating London Boroughs, to drive a high safety standard to ensure that selected operators have in place the best available mitigations. They have noted the difference that this co-ordinated and collaborative approach will make in terms of higher and consistent safety standards to the people they represent in comparison to alternative options (borough by borough approach). In February 2021, TfL hosted a workshop with seven members of staff who represented the views of pregnant women and those who are on maternity or have young children. Although they had concerns, this group echoed the support of the approach and highlighted that a trial will be useful in clarifying the future use of e-scooters including the rules they have to follow.  The trial could improve mobility for some:  The TfL Youth Panel told TfL that particularly for **young Londoners** (who tend to be lower income than other demographics), and those living centrally who may not own a car, rental e-scooters will increase opportunities through making travel easier within their local area and beyond. Further Wheels for Wellbeing told TfL that rental e-scooters, if adapted **to suit people with different physical needs** could provide **some disabled people** with greater opportunities for independent travel. London Cycling Campaign states this is similar for **older people**, in the way TfL have seen e-bikes create an opportunity for those who would not usually be able to travel a long distance by foot or on cycle, e-scooters could provide an opportunity to improve independence for some **older and disabled Londoners**. Tommy’s also felt that e-scooters could **possibly aid pregnant** women who are suffering from pelvic pain, however the extent to which e-scooters would be used in this way is likely to be very limited. A trial will provide the opportunity to investigate these further and better understand the positive impact e-scooters could have on independent mobility for people with protected characteristics in London.  A trial of rental e-scooters could provide a benefit to **those living in areas that are poorly serviced by other public transport modes**. TfL know that people of lower-economic backgrounds tend to live in poorer areas that have fewer transport links. Rental e-scooters available through a local authority scheme  (such as the one being discussed) that are affordable would improve mobility, independence and journey times for those serviced less well by conventional modes. Trust for London further reiterated to TfL at the meeting on the 5 February, the benefit to communities of having a low-cost way to travel without requirement for storage and risk of theft of vehicles, which a rental scheme would achieve.  In 2020, TfL commissioned research into barriers to cycling for **women**. Such barriers included the lack of access to facilities following cycling, with a requirement to shower. Access to electrically supported vehicles such as a rental e-scooter scheme could remove this barrier and improve access to new modes.  The trial could improve access to conventional transport modes for groups that rely on them:  The **RNIB**, told TfL that if e-scooters can contribute to a reduction in crowding on public transport it could aid **blind and partially sighted people** who rely on these modes making their journeys less crowded.    A reduction in congestion on conventional modes of public transport would further benefit people with **autism**, **learning disabilities** and those with **mental health** conditions such as anxiety, who have told TfL that congestion remains a barrier to accessing public transport. As London enters the recovery phase from COVID-19 restrictions, the availability of rental e-scooters could alleviate space on conventional modes for those who need it more critically. This would further benefit **wheelchair users and parents with young children and buggies**.  The trial could aid the reduction of pollution supporting those most at risk of its impacts:  Via the workshop with **pregnant women** and **those who are on maternity or have young children**, TfL heard the concerns of parents and pregnant women of the impact of air pollution on their **unborn babies** **or young children**. A report from the World Health Organisation on air pollution and child health  highlighted that air pollution is a major environmental health threat and children are the most vulnerable to it. The report also highlights that pregnant women that are exposed to polluted air are more likely to give birth prematurely, and have small, low birth weight children. The report also highlighted that children who have been exposed to high levels of air pollution may be at greater risk for chronic diseases such as cardiovascular disease later in life. Those in the workshops felt re-assured and positive about the introduction of a more sustainable mode of transport to London and how this could contribute to the safety and health of their families and even more so if trips normally taken by car were swapped for rental e- scooters. Another participant in the workshop also raised how the introduction of a new sustainable mode of transport could be a positive influence on her young children, setting a good example of how transport must evolve for the benefit of the environment. CoMoUK further highlighted that it will introduce another sustainable transport option for Londoners and that a trial will provide the opportunity for learning to inform future direction.  TfL also know that in London air pollution is concentrated in areas near very busy roads, meaning people living in the most deprived areas of the city are exposed to a quarter more NO2 pollution that those living in the wealthiest areas. As the negative health impacts of air pollution are felt more acutely by **older people, children and those with heart and respiratory conditions**, improvements in air quality and schemes that lead to a fall in air pollution could more acutely benefit these groups.  The trial could provide a preferable option for independent travel for Londoners that may have been victims of hate crime on the transport network:  On 5 February TfL’s youth panel told TfL that a ‘solo’ mode of transport that removed fear of large crowds, intimidation or hate crime could be of benefit to people with protected characteristics, such as **the young, who may have been victims of hate crime** on the transport network. Based on TfL held data on hate crime, in 2019, there were over 2,700 reports of hate crime on TfL’s network, with most of these incidents occurring on the bus network (1,318), followed by London Underground (1,092). From January to September last year, there have been over 1,500 reports of hate crime on the network. Again, most of these reports were from buses and London Underground – 876 and 491 respectively. In both years, a large proportion of the reports (over 70%) have been in relation to race hate crime. TfL know that hate crime is largely under-reported on the transport network, and that a lack of perceived support for victims of hate crime is a large barrier to reporting, so the impact of hate crime could be far higher than these figures here. Providing an additional option for a sustainable mode of travel that does not involve returning to busy transport modes, could be particularly beneficial to Londoners who have been victims to or witnessed hate crime on the public transport network, by ensuring they maintain their independence. Tell Mama, an organisation that supports victims of hate crime against **Muslims**, told TfL that a fear of returning to public transport following an incident will cause victims to then use unaffordable modes such as private taxis. This can in turn make maintaining part-time and low paid work uneconomical and victims have therefore had to give up work. A ‘solo’ affordable mode of travel could prevent this negative effect of hate crime on the public transport network.  **Potential Negative Impacts - Evidence**  Via TfL’s programme of research and engagement, the most significant areas of concern raised by those with protected characteristics tends to be in the area of safety; affecting **older people, disabled people and pregnant women** most significantly. These impact areas, along with others are presented below with the evidence TfL have gained and the following section explores who they are most applicable to.  Risk of falls and subsequent level of injury to riders from rental e-scooters due to vehicle design:  The safety of e-scooters is a growing issue globally, and as a new vehicle type, they do present concerns as TfL strives to deliver Vision Zero in London. In 2019 alone, there were 11 e-scooter fatalities in France and over 1000 people were hospitalised in Austria. Via the Police, TfL has access to statistics on e-scooter incidents from 2019 which show that there was one fatality, 11 serious injuries and 21 slight injuries to e-scooter riders. TfL do not hold or have access to any details of the demographics of those that have been injured other than for the one fatality.  The tyres of e-scooters have often been raised by groups as a concern, with many saying they are too small to deal with un-even road surfaces.  Currently there is no industry standard for the size of e-scooter wheels, and much is to be learnt about this key feature of an e-scooter. However, the Parliamentary Advisory Council for Transport Safety (PACTS) has described e-scooters as having features which are “inherently unsafe”. The report also highlighted that the small wheels of e-scooters are incapable of safely negotiating the ruts, potholes and uneven surfaces of many urban streets. Estimating the safety risk presented by new modes is difficult and comparing modes against each other even more so. In the USA for instance, the e-scooter injury rate appears to be coalescing at around 2.2-2.5 injuries per 10,000 trips, which would mean the typical e-scooter rider requires hospital/urgent care treatment every 3.1 years. To put this figure in context, in London the number of people killed or seriously injured while cycling was 2.7 per million journey stages travelled (i.e. 0.027 injuries per 10,000 journey stages, or roughly 100 times fewer injuries than expected in the e-scooter studies). This means cycling in London would be considerably less risky than e-scooter if these figures were to be replicated here, however as outlined comparisons between cities/countries are incredibly difficult.  The two major safety considerations regarding riders and e-scooters are as below:   1. Head and neck (and subsequently serious) injuries are common and occur more frequently than for cycling:    1. Much attention has been paid to a recent ITF report, which according to media headlines showed that “e-scooters are no less safe than cycling.” Such headlines appear to be misleading. While the fatality risk may or may not be like that of cycles, the study stated that the risk of a serious, life changing injury requiring hospital treatment may indeed be higher for e-scooters.    2. This heightened chance of a serious injury may be in part due to the fact that head injuries are more common, a trend observed across a wide variety of studies and contexts. In the US, the rate of head injuries was found to be more than double the rate for cyclists, with similar figures observed in New Zealand (7.5 per cent vs 3.7 per cent for bicycles). PACTS also felt that the standing position of an e- scooter is unstable, putting the rider in danger of being thrown forward more quickly and with more force than a cyclist which leads to much higher rates of head injury- eight times higher than a cyclist according to the Danish Transport Authority. Further, there is belief that head injuries are more common as a result of riders being further from the ground when they fall due to an incident. 2. Injuries are primarily as a result of riders falling off.    1. **Irrespective of geography**, most injuries are as a result of riders falling off, with studies consistently putting this figure at around 80-85 percent of injuries recorded.   TfL have also considered casualty numbers more broadly in London using the recently published “Road Danger Reduction Dashboard”. This shows that **during 2019 men (63.2 per cent) are more likely to be a casualty in a collision in London than women (34.5 per cent) across all modes of travel**. TfL reviewed this in closer detail and looked at the difference between men and women by mode of transport. All are fairly equal in their split between men and women such as pedestrian casualties, however, men are far more likely to be a casualty in a collision involving powered two wheelers (where out of a total of 5,391 casualties, men were 5,017 of those) and a pedal bike (where out of a total of 4,634 casualties, men were 3,441 of those). TfL do know though that cycling and the use of powered two wheelers are greatly more popular with men.  TfL have also considered the age of e-scooter riders. Although there is no robust evidence in the UK, a Science Direct report focussing on data from Denver and Portland does tend to suggest that **the age of users is younger**. **69 percent of respondents to Portland’s user survey aged 20–39 and nearly half of survey respondents who had ridden e-scooters in Denver were aged 25–39**. Although evidence in the UK is lacking at the moment about the  demographics of users of e-scooters, Rolltech.uk informed TfL that they **felt young black individuals represented the early adopters**, but TfL is unsure what evidence this is based upon. This is something TfL will seek to learn more about as the trial starts through the robust monitoring plans as detailed  in the Operator Specification.  Although the risk of a fall and subsequent injury from an e-scooter is present for all riders, **the level of injury will be disproportionately high for certain groups with protected characteristics, most notably older people and pregnant women**. Tommy’s told TfL that e-scooters would need to be used with care by **pregnant women** as their centre of balance changes as their pregnancy develops and risks of falls would increase. Further, if a pregnant woman falls, particularly on her bump this could be very dangerous; or if a fall leads to injuries to wrists/ankles then they could be more at risk of injury due to softened ligaments in pregnancy. This evidence applies to all injury categories below. **Older people** are also more likely to suffer from more significant injuries due to the well-known fact that bone density reduces with age which could lead to more severe breaking of bones as well as the degree of fragility increasing with age meaning they could be more likely to succumb to injury or a more serious injury that could have longer term impacts or even death.  Risk and level of injury to pedestrians due to illegal or poor rider use including rental e-scooters becoming street litter through poor parking: Nearly all consulted stakeholders as well as written reports have emphasised the risk of injury to other road users as a result of illegal or poor rider use including, e-scooters being incorrectly parked, becoming street litter as well as the consequences of high-risk behaviours. Various stakeholders have  also raised concerns about an increase in the illegal private use of e-scooters by people who believe that the prevalence of e-scooters equates to them being legal.  IDAG and the TfL Accessibility Forum both raised concerns over there needing to be safe and suitable areas for parking, namely areas that don’t impact on other road users or cause obstruction. This was also raised in many of the survey responses TfL had. Considering this further, this concern may be shared by a wider group of Londoners who are less mobile, including those **pushing prams or who are pregnant**. Such individuals could suffer  disproportionality as a result of a trip or fall from e-scooters if they’ve become trip hazards or being used in prohibited areas e.g. footways. For the avoidance of doubt, it is illegal to ride e-scooters on the footways. The TfL Youth Panel informed this discussion further as they stated their concerns  about e-scooters being parked in positions that are either unsafe or block pathways. Although they didn’t stipulate the exact consequence for **younger people**, it could be assumed that e-scooters that are left in unsafe locations could be trip hazards for **smaller children** who don’t have as much road  awareness. Although the TfL Youth Panel felt that it was not enough of a reason not to trial these vehicles, TfL are also aware of research that tells TfL that road injury rates are disproportionally high for some **Black, Asian and Minority Ethnic (BAME)** road user groups (Lawson and Edwards 1991; Thomson and Tolmie 2001). The TfL Vision Zero Action Plan also highlights this with **BAME Londoners** being more at risk, with children in this group being on average 1.5 times as likely to be killed or seriously injured on the roads than non-BAME children. It could be assumed that this could lead to a BAME children being more likely to be involved in an incident with an e-scooter as a pedestrian than non-BAME children.  A BBC article in 2019 highlighted disability activists’ concerns with the dockless bike business model. Their concerns broadly include serious injury from tripping or long detours due to obstruction.  In further support of the above statements, concerns were raised in June 2020 by Andrew Hodgson, President of the National Federation of the Blind of the UK. He wrote a letter outlining the many concerns they have on the proposed plans to introduce trials of rental e-scooters.  A study of injury rates from e-scooters showed that the proportion of non-riders injured by electric scooters, although smaller, was surprisingly large at 17 per cent in Copenhagen25 and 8.4 per cent in California26. The Copenhagen study also highlighted that the group of non-riders most injured from e- scooters were elderly people.  Lastly, some parents raised to TfL their concern of an e-scooter’s height and how it may hit a pushchair or light-weight buggy and injure the child being carried. Although TfL have not found any evidence of this directly, Chris Uff, a neurosurgeon at the Royal London Hospital, said his team had treated  four patients in 2019 with “fairly severe head injuries, either after coming off e-scooters or being hit by people on them27”.  The London “Road Danger Reduction Dashboard28”, shows in 2019 that the number of pedestrian casualties were equally split between men and women.  Risk of injury to pedestrians due to rental e-scooters making little to no sound or not being clearly seen:  Amongst many other stakeholders such as IDAG and the TfL Accessibility Forum, the RNIB have told TfL that silent vehicles such as e-scooters are extremely difficult for **blind and partially sighted people** to see or hear and that it may not always be obvious to someone riding an e-scooter that they are approaching a pedestrian with sight loss. The Urban Transport Group (UTG) has also highlighted concerns of e-scooters being largely silent and have said they could present dangers to pedestrians, particularly those who are less mobile or who may be slower to react.  Risk of injury to pedestrians due to the speed of rental e-scooters:  The TfL Accessibility Forum, which represents multiple organisations, highlighted to TfL their concerns about the speed of e-scooters not being suitable for certain areas or that they’re simply too fast. Furthermore, the National Federation of the Blind of the UK in their paper “No time to trial or legalise e-  scooters” regularly cite speed as a contributory factor to many of the incidents seen in other cities involving e-scooters. TfL expects the speed of an e-scooter to disproportionately impact on **older people** with less mobility and those with a **disability** that limits movement or those that are **visually impaired**. If these people are in the path of an oncoming e-scooter in a shared use area they may struggle to move out of the way as quickly as others would and the injuries could be more significant for them too, especially older people.  A study from Austin Texas is one of the most often highlighted when e-scooter speed is discussed as it states that “more than one-third (37%) of users reported that excessive scooter speed contributed to their injury.”  Risk of injury to other road users as a result of rental e-scooters being used in shared use areas:  The Crown Estate raised their significant concern to TfL about the conflict between pedestrians and e-scooter users that could occur on the public highway. Further, the workshop TfL held with parents and those who are pregnant shared this concern and highlighted their worry of the use of e-scooters in shared use areas in London. In 2018 the RNIB31 responded publicly to concerns about shared use areas in Ealing. Such concerns included, blind and visually impaired people being unaware that they are walking on a footway where cycling is permitted, shock reactions, the inability to see or hear well enough to carry out communication with the other road user as well as an increasing need to walk excessively slowly and regularly stop, constantly strain to see or hear hazards which together become physically fatiguing. Such impacts could also apply to older people, especially those that have reduced mobility and possibly slower reactions.  A conversation with The Guide Dogs for the Blind Association, London Vision and the RNIB in May 2021 informed TfL that there are concerns relating to rental e-scooters becoming a trip hazard even when parked correctly in their designated bays. This is because the type of parking bays that have been approved by the DfT (of which there are 5) are permitted to be situated on the pavement, therefore raising the possibility of interaction between pedestrians and e-scooters. This group explained that their preference would be for parking to be on the carriageway and that should a designated parking area be on the pavement or other surfaces i.e. outside TfL stations, physical markers outlining the space would be preferable as there might otherwise be nothing, other than the parked e-scooters, for a white cane or dog to interact with which could lead to delayed reactions and as such trips or falls. In addition to the mitigations listed in Section 3, this will be monitored throughout the trial to understand how effective the current parking provision is and how it could be developed if necessary. Further, any issues experienced by those that are visually impaired can be raised directly to TfL.  Fear and anxiety of the introduction of rental e-scooters as a new mode of transport and impact on behaviour:  TfL’s programme of research and engagement has also highlighted that it is not just the risk of an injury that causes concern to pedestrians, but it is also the perceived fear of interactions with e-scooters. The Guide Dogs for the Blind Association stated that they are already hearing from blind and partially sighted people who are anxious that a rental e-scooter trial will have an impact on their independent mobility if they’re not managed appropriately. The RNIB provided further evidence of this concern as they told TfL that many people are scared about the introduction of e-scooters. Further, Age UK have said some older people are already anxious about walking on pavements, especially those that have had one or more falls and that the fear of being hit by an e-scooter will exacerbate this and have a potential impact on isolation and activity levels with some choosing to stay at home.  To consider this further this cause of anxiety could affect other groups such as pregnant women and older people who as a result of not feeling safe to complete their normal journey may choose alternative modes of transport such as the use of vehicles. This could prevent them from taking healthy  exercise in order to mitigate their anxiety. A group of pregnant women and those on maternity also shared their concerns about already feeling “extra safety conscious” as a result of being pregnant or pushing a pram and being “more protective of themselves” and that the introduction of an e-scooter rental trial could exacerbate that feeling of stress and anxiety. However, they collectively felt that the introduction of the trial would not lead them to change their behaviours at this stage.  Spread of **COVID-19** via rental e-scooters:  One very topical safety concern is that of the COVID-19 transmission and whether rental e-scooters could contribute negatively towards this due to having various users in any given day and that the disease is passed through touch. It is widely known that COVID-19 can be a far more serious illness to **older people as well as men, pregnant women and the BAME community**. At the end of 2020, a report examining the COVID-19 deaths **of people identified as having learning disabilities, found that the death rate was 4.1 times higher than the general population** and because not all not all deaths of people with learning disabilities are registered on the databases they used, **the real rate could have been as much as 6.3 times higher**. The report explained that a learning disability is a significantly reduced ability to understand new or complex information and those with learning disabilities are likely to have had difficulty recognising symptoms of COVID-19 or following government advice to get tested and socially distance. When considering e-scooters, there will be a necessity for all users to prove understanding of how to use the vehicles at the beginning of each ride and it is therefore unlikely that those with learning difficulties, especially severe levels, would utilise this new mode of transport and therefore the risk of COVID-19 transmission  from e-scooters shouldn’t impact this group in the same way as others.  Fear of increase in harassment and hate crime due to using unsafe or unsuitable areas for starting or ending rental e-scooter journeys: TfL learnt through the dockless bike experience in London the critical importance of structured and safe parking. In addition to ensuring e-scooters are parked in safe places e.g. not discarded on footways, it is also important to consider that chosen parking areas for them are considered safe and visible to others so that the user feels comfortable starting or completing a journey there. This is particularly important because of the prevalence of hate crime and harassment and unintentionally creating spaces where people feel more at risk of this occurring. Our engagement tells TfL that groups who experience this crime disproportionality are **young people, women, BAME communities, LGBT+ as well as some faith groups**. In 2018, 66 per cent of girls aged 14 to 21 told Plan International that they had experienced unwanted sexual attention of harassment in a public place. An Independent news article told TfL that **one in three black, Asian or minority ethnic people** have been racially abused since Brexit and a further study stated that recorded hate crimes rose by up to 100 per cent. Although hate crime already exists and the use of an e-scooter should not adversely contribute to this, it is important to ensure people feel safe where they are and that locations for collecting or leaving rental e-scooters are selected with care and thought.  Women feeling excluded from using rental e-scooters: TfL knows from cycling statistics that representation from women is disproportionality low when it comes to cycling. In 2019/2020 the proportion of men and women who cycled at least once in the year was 62 per cent for men compared to 38 per cent for women. Although TfL does not know if this same trend applies to e-scooters yet, because the UK data doesn’t exist due to the transport’s infancy, other countries experiences suggest it does. A Bloomberg report, focussing on America, states that men are twice as likely as women to use micro-mobility devices like e-scooters and that safety could be a reason why. Additional data from Denver and Portland indicate approximate gender splits of 70/30 and 64/34, respectively, between males and females. Combining this with casualty statistics, which are higher for men, could result in injury rates on e-scooters being higher for men.  Colleagues at TfL who work in Cycling notified the rental e-scooter team of feedback they received in February 2020 in relation to the weight of the Santander Cycles and how it can act as a barrier to women using them. Groups represented in this exchange were Fawcett Society, The Race Equality Foundation, TfL’s Youth Panel and Cycling UK's 100 Women. Although the rental e-scooters are a different type of vehicle this is something we will monitor once a trial begins in London to see if a similar barrier exists as no-one has yet raised it directly in relation to e scooters.  Increase in stress and anxiety as a result of experiencing an incident involving a rental e-scooter: The workshop with pregnant women and those on maternity raised an important concern of the increase in stress and anxiety that could occur as a result of experiencing an incident involving an e-scooter. This could be directly due to involvement in the incident or as a third-party witness to a collision or incident such as road-rage. They felt this could be particularly impactful on children and they were concerned as parents for how witnessing such events could impact them. Witnessing incidents on the road network and the impacts as a result are an existing risk to anyone using the road-space and are unlikely to grow in any substantial way as a result of e-scooters. However, as e-scooters are a relatively new form of transport and many do not have experience of interacting with them yet, there could be an initial rise in conflict as people adjust and learn how to safely interact with one another. An article from the Mental Health Foundation confirmed that people who experience post-traumatic stress disorder can feel anxious for years after the trauma, whether or not they were physically injured39 Furthermore, an article about road-rage40 told TfL that witnessing such an event can have a more profound impact on children especially if someone involved was a parent who is a role-model and it can be very frightening.  Rental e-scooter affordability: The Race Equality Foundation told TfL that the cost of renting an e-scooter will be an issue for those from deprived communities and some black and minority ethnic (BME) groups who are amongst the poorest in the population. TfL also found that this may extend to other groups too, as the London Datastore41 told TfL that income is lower than average for BAME groups, women, younger people and those from the LGBT communities. Whilst the escooter rental charges to customers have not yet been determined, if the cost of hire were too high for these groups, they could be prevented from using the scheme and contribute to transport inequality. The following findings are from the London Datastore:  • Gender: Females earn an average of 17.5% less than males in London  • Ethnicity: BAME individuals earn an average of 29% less than white individuals  • Disability: Those considered disabled earn an average of15% less than those not considered disabled.  The figure below published by Parliament using date from the Office for National Statistics (ONS) illustrates the median weekly pay age group.    Income data based on sexual orientation and gender reassignment is less readily available, however a recent YouGov and LinkedIn survey in 2019 identified Lesbian, Gay, Bisexual and Transgender (LGBT+) individuals earnt an average of 16% less than others. Risk of rental scheme being inaccessible due to lack of a smart phone, not speaking English or a provisional or full drivers’ licence: In order to utilise any rental e-scooter scheme in the UK, a provisional or full drivers’ licence is required as set by the Government. Government figures44 provide that only 52 per cent of black people have a driving licence (the lowest percentage of all ethnic groups). If this trend extends to provisional licences too it could result in a significant proportion of black people being un-able to access a rental e-scooter scheme and contribute to transport inequality. It is important to note this evidence when understanding the full breadth of impacts, however this age stipulation (16 and in possession of a provisional licence) has already been determined by law and isn’t therefore influenced by this policy.  According to the 2019 report on Travel in London: Understanding our Diverse Communities, evidence tells TfL that that disabled and older Londoners are less likely to access the internet or own a smartphone. Feedback we’ve received has emphasised this concern and how some potential users would be excluded from using the service if they do not have a smart phone. According to a BBC article in 2014 over 300 languages are spoken in London schools. As a result, where English is not a person’s first or a spoken language they could be excluded from a scheme if alternative languages were not available. | | Gender | 1. Some women may be disproportionality excluded from using rental e-scooters due to lower than average incomes:   **Low income plans:** Operators are free to set their own pricing for its service to users. However, it should include consideration of an affordable service that competes with other transport options. Throughout the trial all operators must offer low income/equitable access customer plans to support the use of rental e-scooters by **disadvantaged groups** in London. Plans must be visible, and the pricing structure explained clearly to users. TfL hopes to see plans that support those with lower incomes able to access it and Operators’ low income/equitable access proposals will be taken into consideration during the operator selection process.  **Monitoring, data collection and evaluation:** A comprehensive research programme to collect rich quantitative and qualitative data is at the heart of the trial. Data will be collected via the introduction of TfL’s new micro-mobility data platform. It is a contractual  requirement that operators must regularly share a wide range of information on performance including on usage patterns and incidents and data will also be collected from participating London Boroughs, and from both users and non-users. As part of their evaluation and social research on the trials, DfT are collating data on demographics and  socioeconomic characteristics of users. TfL are hoping to access this information for users in London. If TfL are not able to leverage the DfT data, provision has been made to undertake our own data gathering. The user data can then be compared to London-wide population data and understand if certain groups are underrepresented. An important learning objective of the trial is to understand any inequality of access.   1. Men may suffer an increased risk of a collision on a rental e-scooter.   Falls from e-scooters are expected partly due to being a new and unknown mode of transport and not enough awareness of how to use them. Men are more likely to be involved in a collision than women.  **Enhanced vehicle safety features: Operators** must meet the minimum DfT requirements as well as additional features as listed in the Operator Specification which include; forward and rearward lighting which is always on throughout a rental and a bell/horn to allow the rider to make a sound to warn others of their presence and be seen more easily by other road users. Operator’s e-scooters must also be designed with the safety of users, including under impact, and the public in mind.  **Operator education and outreach for users and non-users:** Operators must conduct education for users and outreach for both users and non-users. It must be designed to have maximum reach and focus on the trial, how to safely use e-scooters such as how to ride safely and how to access customer services. This should help men become more familiar with an e-scoter and how to safely use it before their journey. Further, the Operator must ensure that all user communications and user-facing apps, websites and other materials are accessible, and that marketing and any sponsorship must comply with all legal requirements including the Equality Act 2010.  **Required user training and education:** Operators must make easily available within its app at all time, comprehensive and clear training to users on how to ride e-scooters safely and considerately, with training mandatory for first time riders before they can start  a ride. This information must be made available in a format that maximises understanding, including for those whose first language may not be English. This should help all riders understand how to safely ride their e-scooter.  **Required safety processes:** Operators must also have various safety processes in place for users including one for first time users confirming they have understood the training information in advance of starting a ride and that promote the use of helmets. This should work towards ensuring men are prepared before starting their journey.  **Additional safety processes:** Operators should consider additional safety processes and features such as encouraging riders to wear light-coloured of fluorescent clothing. This should help other vehicles ensuring riders are seen.  **Maintenance regimes:** The operator must ensure that all e-scooters made available to rent are maintained on an ongoing basis to ensure they are safe to operate, in good  working order and are adequately charged. This should ensure that vehicles are safe to use before starting rides.  **TfL rental e-scooter campaign:** TfL are preparing a centralised awareness and safety campaign. Raising awareness of the scheme is expected to run approximately for the initial 10 weeks and safety messaging will run throughout the trial via a mix of channels including print (posters), digital and possibly radio. The exact messages are currently in development and will be updated in due course. It is hoped that riders benefit from being  reminded about safe behaviours and it raises attention to all other road users of the presence of e-scooter riders.  **TfL and London Borough community engagement:** TfL and London Boroughs will be designing community engagement programmes. These are being designed but it will be important to consider reaching out to communities who could be at more risk on the e-scooters such as men and working harder to deliver training and key safety messaging to them and building a culture of safe riding.  **TfL existing safety campaigns**: TfL already undertakes multiple road safety campaigns with many targeting younger drivers or soon to be drivers (Safe Drive Stay Alive). Campaigns like this, will continue to occur to motorists but, many of the messages, that  are consistent in other schemes will still be relevant to those who decide to use e-scooters.  **Monitoring, data collection and evaluation**: A comprehensive research programme to collect rich quantitative and qualitative data is at the heart of the trial. Data will be collected via the introduction of TfL’s new micro-mobility data platform. It is a contractual requirement that operators must regularly share a wide range of information on performance including on usage patterns and incidents and data will also be collected  from participating London Boroughs, and from both users and non-users. Incident and collision data will be captured throughout the trial using a range of approaches to ensure  TfL get as complete a picture as possible. Operators are required to log incidents and share that information with TfL, data will also be collected in the same way as existing  modes i.e. through STATS19, plus users and the public will be able to self-report incidents. This information can both be used immediately to understand the nature of the  incident, but then be analysed over time to keep under review the impact on those with protected characteristics and others who are at a greater risk. It is worth noting here that the appropriate privacy and safeguarding measures will be used when capturing this data and it might not be possible to get information on protected characteristics in every case.  Events, incidents, and emergencies: Operators will be required to work with Boroughs, TfL and Police when emergencies, incidents or special events occur to prioritise the safety of users and the general public. This includes for instance suspending the service during severe weather (e.g. snow) when there may be an increased likelihood of injuries.   1. Some women may feel excluded from using a rental e-scooter if cycling trends correlate:   Operators must conduct education for users and outreach for both users and non-users. It must be designed to  have maximum reach and focus on the trial, how to safely use e-scooters such as how to ride safely and how to access customer services. This should help women become more familiar with an e-scoter and how to safely use it before their journey and provide them with more confidence to experience e-scooters if safety is the cause of their possible exclusion. Further, the Operator must ensure that all user communications and user-facing apps, websites and other materials are accessible, and that marketing and any sponsorship must comply with all legal requirements including the Equality Act 2010.    Required user training and education: Operators must provide comprehensive and clear training to users on how to ride e-scooters safely and considerately, with training mandatory for first time riders before they can start a ride.  This information must be made available in a format that maximises understanding, including for those whose first language may not be English. This should help all riders, including women understand how to safely ride their e-scooter and grow confidence which could encourage participation.  TfL rental e-scooter campaign: TfL are preparing a centralised awareness and safety campaign. Raising awareness of the scheme is expected to run approximately for the initial 10 weeks and safety messaging will run throughout the trial via a mix of channels including print (posters), digital and possibly radio. The exact messages are currently in development and will be updated in due course. It is hoped that non-users, including women, will see these messages via the channels above and feel encouraged that safety is the main focus of the trial and that they feel assured to continue with their normal activities knowing other road users are aware of the presence of e-scooter riders.  TfL and London Borough community engagement: TfL and London Boroughs will be designing community engagement programmes. These are being designed but it will be important to highlight to women the safety precautions in place and building a culture of  safe riding.  Ongoing engagement programmes such as the Inclusive Streetspace Engagement and [Cycle Your City,](https://tfl.gov.uk/info-for/media/press-releases/2020/march/tfl-launches-campaign-to-support-women-into-cycli#:~:text=TfL%20is%20marking%20International%20Women%27s,underrepresented%20among%20Londoners%20who%20cycle.) aim to understand the barriers to cycling and better diversify the uptake of active travel modes such as cycling. Such programmes if successful in encouraging cycling could translate to e-scooters especially if mitigations put in place to aid cycling adoption also encourage safe rental e-scooter use. These programmes are continuing and will be able to include activity during the trial to understand how to further mitigate this impact.  Monitoring, data collection and evaluation: A comprehensive research programme to collect rich quantitative and qualitative data is at the heart of the trial. Data will be collected via the introduction of TfL’s new micro-mobility data platform. It is a contractual  requirement that operators must regularly share a wide range of information on performance including on usage patterns and incidents and data will also be collected  from participating London Boroughs, and from both users and non-users. As part of their evaluation and social research on the trials, DfT are collating data on demographics and socioeconomic characteristics of users. TfL are hoping to access this information for users in London. If TfL are not able to leverage the DfT data, provision has been made to undertake our own data gathering. The user data can then be compared to London-wide population data and understand if certain groups are underrepresented. An important learning objective of the trial is to understand any inequality of access.   1. Increased fear and risk of hate crime to some women riders of rental e-scooters at collection and drop off locations   Women are at a higher risk of hate crime and e-scooter parking locations could be in areas that make younger people more at risk of this crime if they’re not chosen carefully.  London Boroughs are developing consistent parking guidance for the selection of suitable designated parking areas. As well as being in areas which are easily accessible, they should also select areas which are well lit, allow people to feel safe and ideally have CCTV to mitigate against the threat of hate crime occurring whilst starting or ending their journey. This is applicable to all groups who are at a higher risk of hate crime.  Monitoring, data collection and evaluation: Reporting hate crime can be encouraged through the feedback mechanisms which will be put in place, as well as directly asked for during survey work. (See Section 14)   1. Increased risk of Covid-19 to men from rental e-scooters   Cleaning of e-scooters: Operators must ensure that all e-scooters made available to rent are maintained to ensure they are safe to operate, in good working order, are adequately charged and cleaned regularly.  Maintenance regimes must include regular and deep cleaning and disinfection of e-scooters, with additional processes in place for e-scooter touchpoints on  an ongoing basis e.g. handlebars, brake levels etc to be cleaned once a day. It will be for the operators to present stringent cleaning processes and maintain these.  TfL has multiple COVID-19 marketing messages in place,  including on handwashing before and after your travel. These messages will remain live on the network and should help to further encourage all to wash their hands in the fight against COVID-19.  Monitoring, data collection and evaluation: A comprehensive research programme to collect rich quantitative and qualitative data is at the heart of the trial. Data will be collected via the introduction of TfL’s new micro-mobility data platform. It is a contractual  requirement that operators must regularly share a wide range of information on performance including on usage patterns and incidents and data will also be collected  from participating London Boroughs, and from both users and non-users. Operators are required to give TfL regular updates on the cleaning regime they are using.  Operators must provide comprehensive and clear training to users, including on any hygiene-related recommendations, in particular that Users are recommended to wash their hands thoroughly before and after use. | | Race | 1. **BAME communities may suffer an increased risk of a collision on a rental e-scooter.**   Falls from e-scooters are expected partly due to being a new and unknown mode of transport and not enough awareness of how to use them. BAME communities are more likely to be involved in a collision.   1. Operators must meet the minimum DfT requirements as well as additional features as listed in the Operator Specification which include; forward and rearward lighting which is always on throughout a rental and a bell/horn to allow the rider to make a sound to warn others of their presence and be seen more easily. 2. Operator’s e-scooters must also be designed with the safety of users, including under impact, and the public in mind, with this being assessed during the Operator selection process. 3. Operator education and outreach for users and non-users: Operators must conduct education forusers and outreach for both users and non-users. It must be designed to have maximum reach and focus on the trial, how to safely use e-scooters such as how to ride safely and how to access customer services. This should help BAME communities  becoming more familiar with an e-scoter and how to safely use it before their journey leading to safer road behaviours. Further, the Operator must ensure that all user communications and user-facing apps, websites and other materials are accessible, and  that marketing and any sponsorship must comply with all legal requirements including the Equality Act 2010. 4. **Required user training and education:** Operators must make easily available within its app at all time, comprehensive and clear training to users on how to ride e-scooters safely and considerately, with training mandatory for first time riders before they can start a ride. This information must be made available in a format that maximises understanding, including for those whose first language may not be English. This should help all riders understand how to safely ride their e-scooter. 5. **Required safety processes:** Operators must also have various safety processes in place for users including one for first time users confirming they have understood the training information in advance of starting a ride and that promote the use of helmets. This should work towards ensuring those from BAME communities are safer on the road. 6. **Additional safety processes:** Operators should consider additional safety processes and features such as encouraging riders to wear light-coloured of fluorescent clothing. This should help other vehicles ensure riders are seen. 7. **Maintenance regimes:** The operator must ensure that all e-scooters made available to rent are maintained on an ongoing basis to ensure they are safe to operate, in good working order and are adequately charged. This should ensure that vehicles are safe to use before starting rides. 8. **TfL rental e-scooter campaign:** TfL are preparing a centralised awareness and safety campaign. Raising awareness of the scheme is expected to run approximately for the initial 10 weeks and safety messaging will run throughout the trial via a mix of channels including print (posters), digital and possibly radio. The exact messages are currently in development and will be updated in due course. It is hoped that riders benefit from being reminded about safe behaviours and it raises attention to all other road users of the presence of e-scooter riders. 9. **TfL and London Borough community engagement:** TfL and London Boroughs will be designing community engagement programmes. These are being designed but it will be important to consider reaching out to communities who could be at more risk on the e-scooters such as men and working harder to deliver training and key safety messaging to them and building a culture of safe riding. 10. **TfL existing safety campaigns**: TfL already undertakes multiple road safety campaigns with many targeting younger drivers or soon to be drivers (Safe Drive Stay Alive). Campaigns like this, will continue to occur to motorists but, many of the messages, that are consistent in other schemes will still be relevant to those who decide to use e-scooters. 11. **Monitoring, data collection and evaluation**: A comprehensive research programme to collect rich quantitative and qualitative data is at the heart of the trial. Data will be collected via the introduction of TfL’s new micro-mobility data platform. It is a contractual requirement that operators must regularly share a wide range of information on performance including on usage patterns and incidents and data will also be collected from participating London Boroughs, and from both users and non-users. Incident and collision data will be captured throughout the trial using a range of approaches to ensure TfL get as complete a picture as possible. Operators are required to log incidents and share that information with TfL, data will also be collected in the same way as existing modes i.e. through STATS19, plus users and the public will be able to self-report incidents. This information can both be used immediately to understand the nature of the incident, but then be analysed over time to keep under review the impact on those with protected characteristics and others who are at a greater risk. It is worth noting here that the appropriate privacy and safeguarding measures will be used when capturing this data and it might not be possible to get information on protected characteristics in every case. 12. Events, incidents, and emergencies: Operators will be required to work with Boroughs, TfL and Police when emergencies, incidents or special events occur to prioritise the safety of users and the general public. This includes for instance suspending the service during severe weather (e.g. snow) when there may be an increased likelihood of injuries. 13. **Increased risk of Covid-19 to BAME communities from rental e-scooters:**   E-scooters could contribute to the spread of Covid-19 through multiple use. The disease can be especially harmful to BAME communities who are more at risk of a serious illness or death from the disease.  Cleaning of e-scooters: Operators must ensure that all e-scooters made available to rent are maintained to ensure they are safe to operate, in good working order, are adequately charged and cleaned regularly.  Maintenance regimes must include regular and deep cleaning and disinfection of e-scooters, with additional processes in place for e-scooter touchpoints on  an ongoing basis e.g. handlebars, brake levels etc to be cleaned once a day. It will be for the operators to present stringent cleaning processes and maintain these.  TfL has multiple COVID-19 marketing messages in place,  including on handwashing before and after your travel. These messages will remain live on the network and should help to further encourage all to wash their hands in the fight against COVID-19.  Monitoring, data collection and evaluation: A comprehensive research programme to collect rich quantitative and qualitative data is at the heart of the trial. Data will be collected via the introduction of TfL’s new micro-mobility data platform. It is a contractual  requirement that operators must regularly share a wide range of information on performance including on usage patterns and incidents and data will also be collected  from participating London Boroughs, and from both users and non-users. Operators are required to give TfL regular updates on the cleaning regime they are using.  Operators must provide comprehensive and clear training to users, including on any hygiene-related recommendations, in particular that Users are recommended to wash their hands thoroughly before and after use.  **5.3**  **Some people from BAME communities may**  **be disproportionality excluded from using**  **rental e-scooters due to lower than average**  **incomes**  **Low income plans:** The operator is free to set its own pricing for its service to users.  However, it should include consideration of an affordable service that competes with other transport options. Throughout the trial all operators must offer low income/equitable  access customer plans to support the use of rental e-scooters by disadvantaged groups in London. Plans must be visible, and the pricing structure explained clearly to users. TfL  hopes to see plans that support those with lower incomes able to access it and Operators’ low income/equitable access proposals will be taken into consideration during the operator selection process **(See Section 22)**  **Monitoring, data collection and evaluation:** A comprehensive research programme to  collect rich quantitative and qualitative data is at the heart of the trial. Data will be collected via the introduction of TfL’s new micro-mobility data platform. It is a contractual  requirement that operators must regularly share a wide range of information on  performance including on usage patterns and incidents and data will also be collected  from participating London Boroughs, and from both users and non-users. As part of their  evaluation and social research on the trials, DfT are collating data on demographics and  socioeconomic characteristics of users. TfL are hoping to access this information for users in London. If TfL are not able to leverage the DfT data, provision has been made to  undertake our own data gathering. The user data can then be compared to London-wide  population data and understand if certain groups are underrepresented. An important  learning objective of the trial (see Section 2) is to understand any inequality of access.  **5.4**  **Some people in BAME communities may be**  **disproportionality excluded from using**  **rental e-scooters if they do not speak**  **English**  Access to a rental e-scooter scheme is likely to  be via an app which if only in English could  prevent many people from accessing the  service.  **Reach and language:** The operator must conduct education for users and outreach for  both users and non-users, as well as with community and stakeholder organisations. This should be designed to have the maximum reach, including for those who would not come into contactwith the app or digital channels and those whose first language may not be  English. **(See Section 20)**  **Monitoring, data collection and evaluation:** A comprehensive research programme to  collect rich quantitative and qualitative data is at the heart of the trial. Data will be collected via the introduction of TfL’s new micro-mobility data platform. It is a contractual  requirement that operators must regularly share a wide range of information on  performance including on usage patterns and incidents and data will also be collected  from participating London Boroughs, and from both users and non-users. As part of their  evaluation and social research on the trials, DfT are collating data on demographics and  socioeconomic characteristics of users. TfL are hoping to access this information for users in London. If TfL are not able to leverage the DfT data, provision has been made to  undertake our own data gathering. The user data can then be compared to London-wide  population data and understand if certain groups are underrepresented. An important  learning objective of the trial (see Section 2) is to understand any inequality of access.  **(See Section 14)**  **5.5**  **Increased fear and risk of hate crime to**  **some BAME riders of rental e-scooters at**  **collection and drop off locations**  BAME communities are at a higher risk of hate crime and e-scooter parking locations could be in areas that make them more at risk of this  crime if they’re not chosen carefully.  **Borough parking guidance:**  London Boroughs are developing consistent parking guidance for the selection of suitable designated parking areas. As well as being in areas which are easily accessible, they  should also select areas which are well lit, allow people to feel safe and ideally have  CCTV to mitigate against the threat of hate crime occurring whilst starting or ending their  journey. This is applicable to all groups who are at a higher risk of hate crime.  **Monitoring, data collection and evaluation:** A comprehensive research programme to  collect rich quantitative and qualitative data is at the heart of the trial. Data will be collected via the introduction of TfL’s new micro-mobility data platform. It is a contractual  requirement that operators must regularly share a wide range of information on  performance including on usage patterns and incidents and data will also be collected  from participating London Boroughs, and from both users and non-users. Reporting hate  crime can be encouraged through the feedback mechanisms which will be put in place, as well as directly asked for during survey work. **(See Section 14)** | | Disability | Varying degree of disability groups can still access the service, providing they meet other eligible criteria (i.e. valid UK driving licence) | | Sexual orientation | **Negative Impacts:**   1. Increased fear and risk of hate crime to riders of some LGBT+ groups at collection and drop off locations   LGBT+ communities are at a higher risk of hate crime and e-scooter parking locations could be in areas that make them more at risk of this crime if they’re not chosen carefully.  Mitigation Actions:   1. Parking bay consistency and guidance. 2. Areas selected with consideration. 3. Monitoring, data collection and evaluation. 4. Some people from LGBT+ communities may be disproportionality excluded from using rental e-scooters due to lower than average incomes   Mitigation Actions:   1. Low income plans. 2. Monitoring, data collection and evaluation.   **Positive Impacts:**   1. A safer and consistent approach to a trial. 2. Enhanced mobility around London. 3. A socially distanced form of travel. | | Age | **Negative Impacts:**   1. Older people could suffer from more severe injuries due to falls from rental e-scooters as a rider and younger people could suffer from an increased rate of collisions due to increased use   Falls and collisions from rental e-scooters are expected. Younger people may experience a higher rate of these due to their popularity with the vehicle and older riders are more likely to suffer from an even more significant injury if they fall from a rental e-scooter  Mitigation Actions:   1. Enhanced vehicle safety features. 2. Operator education and outreach for users and non-users. 3. Required user training and education. 4. Required safety processes. 5. Additional safety processes such as encouraging riders to wear light-coloured of fluorescent clothing. 6. Maintenance regimes (ensuring all e-scooters made available are maintained on an ongoing basis). 7. Events, incidents and emergencies *(Operators will be required to work with Boroughs, TfL and Police when emergencies, incidents or special events occur to prioritise the safety of users and the public. This includes for instance suspending the service during severe weather (e.g. snow) when there may be an increased likelihood of injuries).* 8. TfL rental e-scooter campaign (*TfL are preparing a centralised awareness and safety campaign. Raising awareness of the scheme is expected to run approximately for the initial 10 weeks and safety messaging will run throughout the trial via a mix of channels).* 9. TfL already undertakes multiple road safety campaigns, with many targeting younger drivers or soon to be drivers (Safe Drive Stay Alive). *Campaigns like this, will continue to occur to motorists but, many of the messages will still be relevant to younger people who decide to use e-scooters.* 10. Reduced maximum *speed (the maximum speed of a rental e-scooter has been reduced to 12.5mph and there are also areas of no go zone or go slow zone that Westminster is currently working on).* 11. Monitoring, data collection and evaluation:   A comprehensive research programme to collect rich quantitative and qualitative data is at the heart of the trial. Data will be collected via the introduction of TfL’s new micro-mobility data platform.   1. Increased risk of collision and subsequent level of injury to older pedestrians due to illegal or poor rider use such as rental e-scooters becoming street litter through poor parking.   There are currently 81 designated parking bays within the borough. Riders will not be able to complete their journey unless they are within the designated parking area, to prevent blocking and obstruction.  Mitigation Actions:   1. Required user training and education by the operator. 2. Parking provision will be made available. 3. Designated parking areas will be created. 4. Consistent parking guidance which Operators will need to adhere to via geo-fencing technology. 5. Removal of poorly left e-scooters. 6. Notification to operators of non-compliant parking. 7. Operators must encourage good behaviour including ensuring riders understand the possible implications of their actions on others. 8. No-go and go-slow areas to be introduced. 9. Operator customer service details to be clear. 10. TFL’s contact centre will be available. 11. The Police will undertake enforcement activity. 12. Operator education and outreach for users and non-users. 13. Required operator safety processes. 14. TfL rental e-scooter campaign. 15. TfL and London Borough community engagement. 16. Ability to amend numbers. 17. Reduced maximum speed. 18. Monitoring, data collection and evaluation. 19. Increased risk of injury to BAME children as pedestrians from rental e-scooters who are 1.5 times more likely to be killed or seriously injured on the roads than non BAME children.   Mitigation Actions:   1. TfL safety related campaigns for children. 2. Monitoring, data collection and evaluation. 3. Events, incidents and emergencies. 4. Reduced maximum speed. 5. Increased risk of collision with rental e-scooters to younger and older pedestrians and subsequent increased level of injury due to rental e-scooters making little to no sound or not being clearly seen or used in shared areas.   E-scooters are not always easily seen or heard and if they’re not identified early enough, it could lead to a collision. Older people with slower reactions and younger people with less road awareness is more likely to suffer from collisions with e-scooters for these reasons and the level of injury could be more substantial for older people.  Mitigation Actions:   1. Enhanced vehicle safety features including lights and bell/horn. 2. Additional safety processes including certain clothing. 3. Required user training and education. 4. No-go and Go-slow areas to be introduced. 5. Ability to amend vehicle numbers in operation. 6. Monitoring, data collection and evaluation. 7. Operator education and outreach for users and non-users. 8. TfL rental e -scooter campaign: 9. TfL and London Borough community engagement. 10. TfL’s contact centre will be available. 11. Reduced maximum speed. 12. Monitoring, data collection and evaluation. 13. Increased risk of collision with a rental e-scooter to younger and older pedestrians and subsequent increased level of injury to older pedestrians due to the speed of rental e-scooters.   Some feel the speed of e-scooters is too fast and if people are unable to move out of the path of an e-scooter in time it may lead to collisions. Older people with slower reactions and younger people with less road awareness are more likely to suffer from collisions with e-scooters for these reasons and the level of injury could be more substantial for older people.  Mitigation Actions:   1. No-go and Go-slow areas to be introduced. 2. Reduced maximum speed. 3. Maximum speed of the vehicle can be further reduced. 4. Operator education and outreach for users and non-users. 5. Required user training and education, 6. Additional safety processes including graduated speeds. 7. Ability to amend vehicle numbers. 8. TfL rental e -scooter campaign: 9. TfL and London Borough community engagement. 10. Monitoring, data collection and evaluation. 11. Increased fear of going out for some older pedestrians as a result of the introduction of rental e-scooters as a new mode of transport.   Some feel anxious and worried about the introduction of e-scooters. Older people, especially those that have had falls, are more likely to be nervous and will possibly stay home to avoid interactions leading to isolation and loneliness.  Mitigation Actions:   1. TfL rental e -scooter campaign: 2. TfL and London Borough community engagement. 3. Operator education and outreach for users and non-users. 4. Ability to amend vehicle numbers. 5. Monitoring, data collection and evaluation. 6. Reduced maximum speed. 7. No-go and go-slow zones. 8. Enhanced vehicle safety features. 9. Increased risk of Covid-19 to older riders of rental e-scooters   E-scooters could contribute to the spread of Covid-19 through multiple use. The disease can be especially harmful to older people who are more at risk of death from the disease.  Mitigation Actions:   1. Cleaning of e-scooters. 2. Maintenance regimes. 3. Tfl Covid-19 marketing. 4. Monitoring, data collection and evaluation. 5. Increased fear of hate crime to some younger riders of rental e-scooters at collection and drop off locations   Younger people are at a higher risk of hate crime and e-scooter parking locations could be in areas that make younger people more at risk of this crime if they’re not chosen carefully.  Mitigation Actions:   1. Parking bay consistency and guidance. 2. Monitoring, data collection and evaluation. 3. Some younger people may be disproportionality excluded from using rental e-scooters due to lower than average incomes.   Mitigation Actions:   1. Low income plans. 2. Monitoring, data collection, and evaluation. 3. Some older people may be disproportionality excluded from using rental e-scooters due to lack of a smartphone   Access to a rental e-scooter scheme is likely to be via an app. Older people may feel excluded or put off by a lack of a smart phone or digital awareness.  Mitigation Actions:   1. Operator education and outreach for users and non-users must have maximum reach. 2. Look for options alternative to smartphones. 3. Monitoring, data collection and evaluation. 4. Generation of stress and anxiety for the very young as a result of being involved in or witnessing an incident involving a rental e-scooter.   Mitigation Actions:   1. Incident support via the Sarah Hope Line.   **Possible positive impacts:**   1. A safer and consistent approach to a trial:   As a result of the co-ordinated approach being proposed by TfL (one rental trial of e-scooters) all Londoners and visitors who interact with rental e-scooters directly as a rider or indirectly as another road user will benefit from the raised safety standards set as part of this process as opposed to a fragmented approach with varying rules and standards which is the alternative.  This is likely to be of particular benefit to this group due to older and younger people being more likely to be impacted by the negative safety impacts raised such as increased collisions involving an e-scooter as a rider or pedestrian. The consistent and collaborate approach is facilitating the introduction of higher safety standards to protect these groups.   1. Enhanced mobility around London:   As a result of the co-ordinated approach being proposed by TfL (one rental trial of e-scooters) all Londoners and visitors who interact with rental e-scooters directly as a rider or indirectly as another road user will benefit from the raised safety standards set as part of this process as opposed to a fragmented approach with varying rules and standards which is the alternative.  This is likely to be of particular benefit to this group as some older people do not have access to a smart-phone and the trial requirements request alternatives to this which means older people shouldn’t be excluded for this reason and have the opportunity to experience, if they wish, a new sustainable mode of transport.  Rental e-scooters provide an opportunity to improve independent mobility for some older and younger people, by providing access to an affordable electric powered vehicle. Access through an affordable scheme provides additional opportunity for independence for instance to someone who cannot walk or cycle long distances but could use an electric powered vehicle.  Older and younger people in London are more likely to have low incomes. An affordable rental e-scooter scheme could benefit older and younger people on low-incomes living in deprived areas with poorer links to conventional transport, by providing them access to a quick, sustainable mode to travel.   1. A sustainable, clean new mode that could absorb car trips and reduce pollution:   Rental e-scooters have the opportunity to encourage people to switch from car use to a rental e-scooter instead for their trip. Pollution levels are particularly dangerous to children and older people and so the benefits of improved air quality could be far greater on this group.   1. A socially distanced form of travel:   Rental e-scooters offer a new socially distanced form of travel. Certain groups, such as older people, are more at risk of suffering from a more dangerous version of the disease. If chosen as a transport option, rental e-scooters could help older people move around London more comfortably, or, as a result of other people using rental e-scooters it would mean public transport is less crowded for them.   1. Independent travel:   An independent form of travel could benefit groups who are more at risk of hate crime on the public transport network and lead to increased confidence being able to travel independently on a rental e-scooter rather than on a busy transport mode.   1. Less congested transport network:   A switch to rental e-scooters from conventional modes as discussed would further free up critical space for older people who need access to seats and experience congestion as a barrier to travel. | | Religion or belief | **Negative potential impacts:**   1. Increased fear and risk of hate crime to riders of some faith groups at collection and drop off locations   Mitigation Actions:   1. Parking bay consistency and guidance. 2. Parking locations are selected with consideration. 3. Monitoring, data collection and evaluation.   **Positive potential impacts:**   1. A safer and consistent approach to a trial. 2. A socially distanced form of travel. | |
| **2.2 Are there any groups with protected characteristic that are overrepresented in the monitoring information relative to their size of the population?** *If so, this could indicate that the proposal may have a disproportionate impact on this group even if it is a universal service.* | | *If yes, provide details.* |
| **2.3 Are there any groups with protected characteristics that are underrepresented in the monitoring information relative to their size of the population?** *If so, this could indicate that the service may not be accessible to all groups or there may be some form of direct or indirect discrimination occurring.* | | *If yes, provide details.* |
| **2.4** | **Does the project, policy or proposal have the potential to disproportionately impact on people with a protected characteristic? If so, is the impact positive or negative?** | |
|  | |  |  |  |  |  | | --- | --- | --- | --- | --- | |  | **None** | **Positive** | **Negative** | **Not sure** | | Men or women |  |  |  |  | | People of a particular race or ethnicity (including refugees, asylum seekers, migrants and gypsies and travellers) |  |  |  |  | | Disabled[[1]](#footnote-2) people (consider different types of physical, learning or mental disabilities) |  |  |  |  | | People of particular sexual orientation/s |  |  |  |  | | People in particular age groups (consider in particular children, under 21s and over 65s) |  |  |  |  | | People who are intending to undergo, are undergoing or have undergone a process or part of a process of gender reassignment |  |  |  |  | | Impact due to pregnancy/ maternity |  |  |  |  | | People of particular faiths and beliefs |  |  |  |  | | People on low incomes |  |  |  |  |   **If any of the answers to the questions above is, “negative” or “unclear” you will need to undertake a detailed impact assessment.** | |

|  |  |
| --- | --- |
| **2.5** | **Based on your responses, should a full, detailed EIA be carried out on the project, policy or proposal** |
|  | Yes No |
| **2.6** | **Provide brief reasons on how have you come to this decision?** |
|  | Disabled groups, under 16’s and potentially pregnancy affected groups will be impacted by the decision to go ahead with the trial. |

**SECTION 3: ASSESSING THE IMPACT**

In order to be able to identify ways to mitigate any potential impact it is essential that we know what those potential impacts might be. Using the evidence gathered in section 2, explain what the potential impact of your proposal might be on the groups you have identified. You may wish to further supplement the evidence you have gathered using the table below in order to properly consider the impact.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Protected Group** | | **Positive impact?** | | | **Negative impact? If so, please specify the nature and extent of that impact** | **No specific impact** | **If the impact is negative how can it be mitigated? Please specify any mitigation measures and how and when they will be implemented** | **What , if any, are the cumulative effects of this decision when viewed in the context of other Council decisions and their equality impacts** |
| Eliminate  discrimination | Advance equality | Good relations |
| **Gender** | Men |  |  |  |  | x |  |  |
| Women |  |  |  |  | x |  |  |
| **Race** | White |  |  |  |  | x |  |  |
| Mixed/Multiple ethnic groups |  |  |  |  | x |  |  |
| Asian/Asian British |  |  |  |  | x |  |  |
| Black/African/Caribbean/  Black British |  |  |  |  | x |  |  |
| Gypsies / travellers |  |  |  |  | x |  |  |
| Other ethnic group |  |  |  |  | x |  |  |
| **Disability** | Physical |  |  |  | Certain physical disability groups may not be able to use this type of service, as it requires a good physical ability to balance and operate the use of a 2-wheeled e-scooter and controls. |  |  |  |
| Sensory |  |  |  | Vehicles becoming street litter and left in unsuitable places, quiet operation speeds and low awareness of their approach |  | Dedicated parking areas along with geofencing technology will encourage good parking behaviours and minimise any unauthorised parking that may become an obstruction. TfL data platform will allow TfL & participating boroughs to monitor parking compliance and will form as part of monthly performance review with operators.  DfT type approved vehicles specified vehicles to have adequate bell/horns as well as safety lights to improve visibility of vehicles in operation. |  |
| Learning Difficulties |  |  |  |  | x |  |  |
| Learning Disabilities |  |  |  |  | x |  |  |
| Mental Health |  |  |  |  | x |  |  |

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Protected Group** | | | **Positive impact?** | | | | | | **Negative impact?** | | **No specific impact** | | **What will the impact be? If the impact is negative how can it be mitigated? (action)** | **What are the cumulative of effects** |
| Eliminate  discrimination | | Advance equality | | Good relations | |
| **Sexual Orientation** | Lesbian, gay men, bisexual |  | |  | |  | |  | | x | |  | |  |
| **Age** | Older people (50+) |  | |  | |  | |  | | x | |  | |  |
| Younger people (16 - 25) |  | |  | |  | |  | | x | |  | |  |
| **Gender Reassignment** | | |  | |  | |  | |  | | x | |  |  |
| **Impact due to pregnancy/maternity** | | |  | |  | |  | |  | |  | | x |  |
| **Groups with particular faiths and beliefs** | | |  | |  | |  | |  | | x | |  |  |
| **People on low incomes** | | |  | |  | |  | |  | | x | |  |  |

**THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER**

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**DATE (DD/MM/YYYY)**: 17/9/2021

**WHAT NEXT?**

**It is the responsibility of the service to complete an EIA to the required standard and the quality and completeness of EIAs will be monitored by EMT.**

**All EIAs for proposed changes to levels of service arising from budget proposals must be completed by (insert date).**

**All completed EIAs should be sent to** [**Equalities@westminster.gov.uk**](mailto:Equalities@westminster.gov.uk)

1. Disability discrimination is different from other types of discrimination since it includes the duty to make reasonable adjustments. [↑](#footnote-ref-2)