

E-SCOOTERS EQUALITY IMPACT ASSESSMENT

An Equality Impact Assessment (EqIA) is a review of a new or existing policy which establishes whether the policy has a differential impact on specific equality groups and identifies how the policy can help promote inclusion and improve equality of opportunity for different groups of people. The term policy is interpreted broadly and refers to anything that describes what we do and how we expect to do it. It can range from policies and procedures, to strategies, projects, schemes and everyday customs and practices that contribute to the way our policies are implemented and how our services are delivered. An EqIA aims at improving the WMCA's work, by promoting equality and ensuring that the proposed or existing policy promotes equality can benefit a wide range of people and will not disbenefit

DIRECTORATE	TfWM
PEOPLE RESPONSIBLE FOR CONDUCTING AND OVERLOOKING ASSESSMENT	Emily Perry
NAME OR TITLE	E-scooter trial
DATE OF COMPLETION	August 2020
DATE DUE FOR REVIEW	To be monitored and reviewed mid-way through the trial
PERSON RESPONSIBLE FOR ARRANGING REVIEW AND MONITORING	Emily Perry

A. ABOUT THE POLICY

1. Describe the main aims, objectives, activities and outcomes of the policy. Who is expected to benefit?

The 12-month trial involves rental e-scooter services to provide e-scooters on the street for hire, similar to rental schemes in other countries. These allow people to unlock the e-scooter using an app, ride to their destination, park the e-scooter and pay in the app. The trial is a relatively low-cost method of trialling a new transport alternative and may be especially useful at Covid-19 recovery stage as public transport capacity is reduced. The trial is also an opportunity to understand the operational challenges of e-scooters in West Midlands and to understand how e-scooters are used and by whom and their potential to support

modal shift for short to medium length trips. DfT will be able to assess the benefits of e-scooters as well as their impact on public space, which will inform the national longer-term policy position.

The trial will take place in Birmingham, Coventry and Kenilworth, Wolverhampton, Walsall, West Bromwich and Solihull. TfWM is the co-ordinating authority for the trial and the process of procuring the e-scooter supplier/s for the different trial zones in the different trial zones is led by TfWM but Las will have highway authority and operational relationships will be between the e-scooter supplier/s and LAs. The trial has been split into three phases – development and procurement, preparing to launch and operational.

Local Objectives



Overarching	Transport
<ul style="list-style-type: none"> ➤ Supporting a healthy and green re-start post COVID ➤ Supporting clean air and de-carbonisation, including a cultural shift to a shared economy and sustainable active travel ➤ Enabling inclusion and increasing accessibility across the social spectrum ➤ Stimulus to drive manufacturing and management of micro-mobility to the West Midlands ➤ Provides a catalyst to attract further innovation schemes 	<ul style="list-style-type: none"> ➤ Provide another financial viable and sustainable mode of transport that encourages a transition from single occupant car travel. ➤ Providing faster access to more places. ➤ Accelerating the ability of the transport system to return to normal. ➤ Off-setting the potential for a mass reversion to car use in urban areas. ➤ Providing learning: <ul style="list-style-type: none"> ➤ Improving the evidence base, which globally is inconclusive ➤ Understanding if eScooters could be made safer if they are not safe enough ➤ Informing future legislation and/or regulation ➤ Better understanding pricing / operational models

The number of e-scooters operating in each trial zone will vary according to the size of the zone itself, the population served and the anticipated and observed demand. Initial deployment of e-scooters will be quite limited to ensure careful monitoring and successful integration during early stages of the trial.

Privately owned e-scooters will remain illegal to use on the road, cycle lanes and tracks and pavements. E-scooters will use the same road space as cycles and e-bikes and will need to adhere to road speeds. This means e-scooters would be allowed on the road (except motorways) and in cycle lanes and tracks, where possible. Hire e-scooters permitted as part of the trial will be subject to an upper speed limit of 15.5mph. This will be enforced automatically via electronic geofencing controls on the e-scooters themselves and cannot be overridden by the rider.

E-scooters will not be permitted on pavements and in areas designated by local authorities (such as public squares, pedestrianised zones or canal towpaths).

Users must hold a full or provisional driving licence to be able to use a trial e-scooter. Care will need to be taken when devices are used and parked rules will make clear to users where they are allowed to park and how they should use and park the devices but also provisions will be made for improperly parked vehicles to be relocated promptly. Similarly, care will be taken for damaged and faulty devices to be removed from the public realm promptly. Providers of e-scooters will be required to provide training to e-scooter users. They will also need to inform users of where and how they should ride and park through the mobile application before each journey. All users will be encouraged to wear helmets when riding.

B. EQUALITY RELEVANCE/IMPACT

2. Does the policy affect the public or employees directly or indirectly? In what ways?

The trial will have direct impact on the public, namely e-scooter users, motorists, cyclists and pedestrians.

3. What information is available on the equality issues in the key target groups¹? (what inequalities, discrimination /and health inequalities currently exist in relation to the target groups? What information/data do you have that explains why these inequalities exist and how they are maintained?)

Regional demographics

This gives us an understanding of regional demographics and the key groups affected by the implementation of the trial based on geography

Key West Midlands MET area data (**demographics** as per 2011 Census)

Ethnicity: 34% BME (46.9% in Birmingham, the most ethnically diverse city in the region. Solihull is the least diverse with 14.2% being BME). Asian British (Indian and Pakistani) are the largest minority groups, with strong presence especially in Birmingham, Coventry, Sandwell and Wolverhampton. They are followed by Black British (Caribbean), White other and Black British (African) and Mixed (White and Black Caribbean). The above figures relate to the 2011 Census and local/regional population estimates show that the figures are higher with Birmingham being a “Black majority city”. There are distinct concentrations of minority ethnic communities within the metropolitan area.

¹ Equality target groups: Age, gender disability, race, religion and belief, pregnancy and maternity, socio-economic, sexual orientation

Religion and Belief: 53.8% of the MET population are Christian, 20.3% have no religion, 12.2% are Muslim, 4.3% Sikh and 2.2% Hindu. These figures change depending on where you live – so in Coventry, 21.8% of the population are Muslim and in Sandwell 8.7% are Sikh.

Gender: In line with national figures, 49.2% are male and 50.8% are female.

Age: The West Midlands Metropolitan area has one of the highest proportions of population aged under 16 and a lower proportion of people aged over 65 compared with other regions. The mean age is 37.4 which compares to 39.4 in England and Wales. The only districts that slant older are Solihull and Dudley. Walsall has got a higher proportions of younger aged groups but it also has a higher proportion of people above retirement age. Birmingham specifically is described as the youngest city in Europe, with under 25s accounting for nearly 40% of the population. The younger population, with the proportion of people aged 0 to 19, is projected to drop slightly from 26.7% in 2012 to 25.8% in 2037. The West Midlands Metropolitan area also generally has a lower percentage of people aged 65+ with the exception of Solihull and Walsall that have higher proportions of people above retirement age than nationally.

The number of people aged 85 or more will double between now and 2041.

Sexual orientation: 1.3% of the West Midlands population identified themselves as gay, lesbian or bisexual. However, key organisations such as Stonewall estimate the figure to be higher at 5-7%.

Disability: The West Midlands Metropolitan area has a larger percentage of people in households with a limiting long-term illness (6% of households compared to 4.7% in England and Wales). It also has a slightly larger proportion of disabled people than England and Wales (19% versus 18% in England and Wales). More and more people are living with impairments or with or beyond serious illness.

Covid-19 health Inequalities by Equality Group

Covid related health inequalities are outlined as the extent to which e-scooters are appropriately provisioned, protected and safely maintained by the operator during the pandemic may have a larger impact on some groups

Age and Gender: Covid-19 diagnoses positively correlates with age. Men account for 46% of Covid-19 cases overall but make up 70% of hospital admissions and 60% of deaths. In comparison to cases in those under 40, individuals over 80 years old are 70% more likely to die from Covid-19. Disabilities that develop with age could also be a contribution to this.

Health and Disability: Individuals with underlying health conditions are at a higher risk of poor outcomes from Covid-19 compared to those who don't have such. It has been suggested that the underlying conditions most associated with poor outcomes are: diabetes mellitus, chronic lung disease and cardiovascular disease; 21% of Covid-19 related death certificates also list diabetes as a health condition. Higher BMI levels have shown a positive correlation with Covid-19

cases and deaths. 7.7% of Intensive Care Covid-19 cases were morbidly obese. There is an increased risk of adverse outcomes in obese or morbidly obese Covid-19 patients.

Ethnicity: Research suggests that BME groups are disproportionately affected by Covid-19, with a higher risk of death. Black men are 4.2 times more likely to die from Covid-19 related illness compared to their white counterparts (when taking into account age). There is a similar trend amongst Bangladeshi, Pakistani, Indian and Mixed ethnic groups. 15.2% and 9.7% of critically ill Covid-19 patients were from Asian and Black ethnic groups, respectively, despite only accounting for 10.8% of the overall population (when combined)².

Socioeconomic: People living in deprived areas are more likely to test positive for Coronavirus and have poorer outcomes in comparison to those living in the least deprived areas. This is also applicable to deaths, Covid-19 mortality rates, among people of working age, in the most deprived areas are more than double the rates in the least deprived areas. It is suggested that, within the rough sleeping population, 2% of women and 1.5% of men have received a Covid-19 diagnosis – a much higher rate in comparison to the general population. Individuals who are employed in lower skilled occupations, such as retail assistants and social care job roles, have significantly higher death rates from Covid-19. The West Midlands had the third highest death rate outside of London, after the northern regions whilst the South East had the lowest, socioeconomic factors within these areas no doubt plays a role in the number of Covid-19 cases and deaths, with both instances being more concentrated in urban areas. Socioeconomic elements play into factors such as health care access (and quality) as well as individual health levels overall, with poorer health reported in the most deprived areas.

Reliance on public transport

Given the potential continued reduced capacity of public transport this information helps understand what groups are more likely to be impacted and how an alternative to public transport may be a more viable option provided it is cost effective and easy to access. These inequalities may also in turn help highlight some constraints in accessing e-scooters at trial phase

The percentage of car ownership within the West Midlands Metropolitan area positively correlates with the English Indices of Multiple Deprivation. Levels of deprivation impact the likelihood of being able to purchase a car. People on the lowest income centiles are much less likely to own a car and some of the most deprived wards have under 50% household car ownership. Groups much more likely to be reliant on public transport are: Single parents (primarily women);

² According to 2011 Census

young and older people; black and minority ethnic people (BME people twice more likely to live in a household with no car ownership); people on low incomes; part-time workers; unemployed people (3/4 of jobseekers do not own a car); disabled people (only 38% of people with mobility difficulties are main drivers or have household access to a vehicle). The majority of bus and foot travel are made by individuals from the lowest income groups whereas train, metro and bicycle trips are mainly made by those who fall within the highest income groups. A significant percentage of West Midlands residents rely on public transport, primarily buses, to get around. White British people are more likely to live in a household with access to a car or van than any other ethnic group. Black people are more than twice as likely as white people to live in a household with no access to a car or van; there has been a marked drop in car ownership amongst young people. Even though car ownership can pose an advantage to many, 67% of car-owning households in the lower income groups report experiencing car related economic stress as running costs can be prohibitive. Car owners and main drivers in households are the least mobility constrained across all social groups. They make more trips over longer distance for all journey purposes giving them higher levels of access to activity, employment and other opportunities. Mobility and accessibility inequalities are highly correlated with social disadvantage. Lower income households travel much less and travel over much shorter distances than higher income household. They make nearly 20% fewer trips and travel 40% less distance than the average household. People who depend more on bus for work tend to be lower paid, live in more deprived areas and are more likely to turn down jobs due to transport issues, than those on higher incomes, who tend to use cars and trains more often

Accessibility: Disabled people are more reliant on public transport in comparison to other groups, yet 1 in 5 disabled people within the West Midlands have reported having difficulty accessing the public transport network as a result of their condition. Barriers such as a lack of integration between different modes of transport, inaccessible railway stations, poor staff and passenger attitudes, safety concerns and inadequate, inaccessible information provision contribute to difficulties for disabled people when it comes to using public transport.

Network Accessibility: Disabled people are more reliant on public transport in comparison to other groups, yet 1 in 5 disabled people within the West Midlands have reported having difficulty accessing the public transport network as a result of their condition. Barriers such as a lack of integration between different modes of transport, inaccessible railway stations, poor staff and passenger attitudes, safety concerns and inadequate, inaccessible information provision contribute to difficulties for disabled people when it comes to using public transport.

Digital Inequalities

These are important to highlight as the main way to access the trial is via an app and the main payment option is via a bank account.

Digital skills are typically lower for those who are from deprived backgrounds. As society shifts more towards online systems and phasing out face-to-face interaction, those who do not possess sufficient skills or knowledge will struggle to adapt. As a result of this, the inequality gap will widen, with these individuals becoming more isolated. Just under 60% of individuals from lower income groups do not have access to the internet whereas 99% of individuals within higher income groups do.

3% of the population within the West Midlands do not have a bank account. These individuals rely solely on cash as a means of purchasing goods and accessing services, such as public transport. Interestingly, even though over 90% of adults own a debit card, the percentage of those who utilise online transactions is much less. Nationally, 7.5% of adults have never used the internet and within the West Midlands Metropolitan area, 13% of residents have never sent an online message or email.

95% of non-disabled adults were listed as recent internet users whereas this was only 78% for disabled adults. Contrastingly, this is not consistent with the internet usage of young disabled adults in the 16 to 24 demographic; 98% of disabled young adults were listed as recently using the internet which is close to the 99% of non-disabled young adults. This suggests that disabled people from older age groups are more disadvantaged when it comes to digital inequalities. Moreover, this is applicable to the overall older demographic, regardless of disability. Almost half of people aged 75 and over are not recent internet users. This may cause issues for the older population, with government forms and bill payments gradually moving online, these individuals may have great difficulty navigating the systems and subsequently paying their bills etc.

Nationally:

- 4.1 million adults living in social housing are offline
- 5.9 million adults have never used the internet
- 20% of disabled adults have never used the internet
- Adults aged 16 to 24 have the highest rates of internet use
- 67% of those not in paid work or full/part time education said they had never paid for public transport tickets online (compared to 52% in full time work; 53% in part time work and 60% in education).

Driving license statistics

This information is important as a prerequisite for the trial is that users having a full or provisional driving licence

74% of people aged 17 and over have full driving licence (2018 statistics)

White people were consistently the most likely to have a full driving licence and black people were least likely to (52%). Generally ethnic minority groups were less likely to have a licence.

Approximately 81% of men and 70% of women hold a licence. These percentages vary by age however, with a much smaller gap for younger age groups

Pedestrian fatalities and injuries by protected characteristics – a few key facts

-For every mile walked, low income pedestrians are 3 times more likely to be injured than pedestrians from higher income households

-Disabled people are five times more likely to be injured as a pedestrian than non-disabled people

-Older and younger pedestrians are also much more likely to be injured

-Men are more likely to be injured or killed as pedestrians than women.

4. Is the policy likely to have a positive or negative impact on any equality target groups? Please elaborate (Is it likely to affect some groups differently in either a positive or negative way? What elements of the policy will have a differential impact?)

The availability of e-scooters is likely to expand the travel options for people in the region which is especially important at Covid-19 recovery stage given the decreased public transport capacity. They could also help reduce congestion and improve air quality in urban areas if they replace journeys by car (they have not been as successful in other trials around the world – both Europe and the United States- modal shift wise) which is likely to have positive impact on a number of protected characteristics, namely BAME people and people from lower socio-economic backgrounds who are more likely to live in more polluted, urban settings.

E-scooters may also be more inclusive than bikes or e-bikes as they don't require pedaling, therefore potentially increasing mobility for some people with accessibility needs.

While the availability of e-scooters will expand the travel options for people who are able to use them, there are a number of groups who are less likely to benefit or/and more likely to disbenefit from the trial should it not be implemented with key considerations in mind. Specifically:

- E-scooters could become an accident hazard for vulnerable pedestrian users (please see question 3 on who is more likely to be vulnerable).
- People with visual impairments are an especially vulnerable group as e-scooters are harder to detect than cars and they operate quietly which

makes them difficult to hear. Due to their speed and weight they are more likely to result in heavier pedestrian injuries. It is also important to note that it is more difficult to signal on a moving scooter if turning or look over your shoulder behind you. It is also relatively difficult to perform an emergency stop on an e-scooter, especially if travelling near the maximum speed. A number of charities such as RNIB and Focus have raised concerns over the approved weight and speed specifications approved by DfT.

- Likewise, given safe street and parking infrastructure availability, the scheme (if not implemented properly) may result in increased street “clutter” making streets more difficult to navigate for some people including disabled people, older people and parents with pushchairs, especially if not adequately policed/enforced.
- As the trial scheme will be fully managed by the operator who will run the scheme for profit (with no subsidies) and given known rental rates, scooters are likely to be cost effective alternatives to taxis and cars but are likely to be less cost-effective than public transport. They are therefore unlikely to reduce transport inequality for the groups on lower incomes who may find the scheme unaffordable.
- Scooter purchases in the U.K. and rental trials in other countries show that scooter users are a rather homogeneous group – younger, male and white. They are also more likely to be from higher socio-economic groups meaning that a number of different measures will need to be considered both marketing, location and discount wise to expand reach
- The scheme is likely to have negative impact on those groups (see question 3) who are more likely to be digitally excluded, less likely to be able to use banking and less likely to have a driving license.

5. Have you consulted interested parties (including representatives from the equality target groups) who will/may be affected by the policy? What were the outcomes of the consultation? If you haven't conducted consultation, is there need for consultation and who are you planning to consult?

Consulation has taken place with a number of regional and local stakeholders, including equality and disability groups. Regular events leading to the launch and during the trial led by LAs will be tailored to the groups and residents of each zone. Equality groups will be engaged throughout the process

6. Is further research needed (i.e. consultations, working groups, surveys, data) to properly assess impact on the different equality target groups? If yes, how will it be undertaken and by when?

Further research is not needed at this stage. However, this EqIA will need to be monitored and reviewed midway through trial stage

7. What measures does, or could, the policy or strategy include to help promote inclusion and equality of opportunity for and/or foster good relations between people from different equality groups?

- Explore discount options for lower income groups as the e-scooter solution would otherwise be prohibitive. There is also an impact on a number of other protected characteristics who are more likely to be on lower incomes (i.e. BAME groups – see question 3 for more details). Given that these groups are more likely to be reliant on public transport and given the reduced capacity of public transport due to COVID-19 restrictions, it is important to consider how the needs of these groups can be accommodated via this new transport solution/trial to ensure that they are not further excluded. Such considerations need to be included at tender stage and they need to form part of the selection criteria.
- Explore access options for those who do not have a smartphone or/and are unbanked. Digital inequalities stats for the region (see question 3) suggest that there is a need for such solution to ensure a sizeable percentage of the population still has the opportunity to access the trial. Such considerations need to be included at tender stage.
- Infrastructure investments are needed to ensure that, where possible, parking bays have detectable kerbs that separate walkways from parked e-scooters. A cost-effective solution would be the repurposing of road car parking.
- Strong mechanisms to enforce parking compliance rules should be written in tender and contract documents and at implementation stage monitoring of adherence to parking requirements is essential. Work with operators and the police to define how proactive enforcement can be achieved, including through fines.
- E-scooters will not be permitted on pavements and in areas designated by local authorities (such as public squares, pedestrianised zones or canal towpaths). Also, need to ensure that e-scooters do not share spaces with pedestrians in a “shared spaces” or “mixed-use area” setting as shared spaces force people with sight loss to mix with faster moving vehicles they cannot see or hear.
- Ensure engagement with disabled people and other equality groups is consistent throughout the trial and develop mechanisms to communicate changes

- Campaigns on safe e-scooter driving and parking is important as they will help ensure more people are socially responsible when using e-scooters. Include this in tender requirements.
- Training and support will be offered to new drivers– ensure this is consistently offered
- Include a requirement in tender for operator staff to undergo effective disability awareness training.
- Maximum speed limit is 15.5 and this will be enforced automatically via electronic geofencing controls on the e-scooters themselves and cannot be overridden by the rider. Consideration needs to be given to lowering speed limits for certain areas, such as around schools.
- E-scooter design can help improve visibility of the vehicle and it can also help with enforcement/compliance (for those vehicles that are more easily identifiable). Design variability and visibility should be considered at tender and selection stage. Consider selecting providers that offer a variety of e-scooters including scooters with seating provisions for disabled people or people with mobility issues.
- Ensure accessible complaints procedures are in place to facilitate enforcement of the rules around usage and parking

8. Do you think that the policy in the way it is planned and delivered will have a negative, positive or no impact on any of the equality target groups (please tick as appropriate)?

Positive impact: where the impact on a particular group of people is more positive than for other groups

Negative impact: where the impact on a particular group of people is more negative than for other groups

Neutral impact: neither a positive nor a negative impact on any group or groups of people, compared to others.

EQUALITY TARGET GROUP	AGE	GENDER (including gender reassignment)	DISABILITY	MATERNITY	RACE	RELIGION/BELIEF	SEXUAL ORIENTATION	SOCIO-ECONOMIC
POSITIVE IMPACT	✓							
NEGATIVE IMPACT	✓		✓		✓			✓
NEUTRAL IMPACT		✓		✓		✓	✓	

12. If adverse/negative impact is noted to any of the listed equality target groups, can it be justified, i.e. on the grounds of promoting equality of opportunity for any other group/s?

Whilst these measures may have a negative impact on certain demographics (depending on how they are promoted, implemented and monitored), a number of mitigating actions (as per question 7) can help mitigate the negative impact.

9. ACTION PLAN

What practical actions can be taken to promote inclusion and reduce/remove any adverse/negative impact?

Issues to be addressed	Actions required	Responsible officer	Timescales	How would you measure impact/outcomes in practice
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APPENDIX A

<p>Ensure the trial is accessible to a wider range of west midlands residents</p>	<p>Explore discount options for lower income groups as the e-scooter solution would otherwise be prohibitive. To be included at tender stage and form part of the selection criteria</p> <p>Explore access options for those who do not have a smartphone or/and are unbanked. To be included at tender stage as a requirement</p> <p>Diverse marketing campaigns to engage a wide range of users</p>			<ul style="list-style-type: none"> -Inclusion in tender documents and forms part of assessment criteria -Provisions in place -Take up of the trial by a diverse range of users
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APPENDIX A

<p>Ensure the trial does not pose a hazard to vulnerable pedestrians (i.e. people with a visual impairment, disabled people, older people, young children)</p>	<p>Infrastructure investments to ensure that, where possible, there is a clear separation between parking bays and pedestrian areas</p> <p>Strong mechanisms to enforce parking compliance rules should be written in tender and contract documents/</p> <p>Work with operators and the police to define how proactive enforcement can be achieved, including through fines.</p>			<ul style="list-style-type: none"> -Inclusion in tender documents -Infrastructure investments, where needed -reduction in accident numbers and positive feedback from user groups -clear monitoring and enforcement mechanisms in place that are implemented -compliance to rules - a diverse range of scooters that are easily detectable -clear partnership with enforcement bodies -proof of continued engagement with user groups and auctioning, where needed

	<p>Ensure that e-scooters do not share spaces with pedestrians in a “shared spaces” or “mixed-use area” setting</p> <p>Ensure engagement with disabled people and other equality groups is consistent throughout the trial and develop mechanisms to communicate changes</p> <p>Launch campaigns on safe e-scooter driving and parking – include such requirements in tender documents</p>			
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	<p>Include a requirement in tender documents for operator staff to undergo effective disability awareness training</p> <p>Consider selecting providers that offer a variety of e-scooters including scooters with seating provisions for disabled people or people with mobility issues.</p> <p>Ensure accessible complaints procedures are in place to facilitate enforcement of the rules around usage and parking</p>			
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