

EQUALITY IMPACT ASSESSMENT

The Equality Act 2010 requires all public bodies, including local authorities, to show “due regard” to the impact their policies and procedures have on people from different groups. This includes gender, race, religion, age, disability, sexual orientation and gender identity. We also have a responsibility to foster good community relations. Although they are not a legal requirement, conducting a basic assessment will allow you to look at the possible implications of a policy or procedure, and take any mitigating action if appropriate.

Remember:

- Equality Impact Assessments (EIAs) should be carried out on **relevant** policies and procedures. Not all policies or procedures will require them. If you are unsure if one is required, please contact the Equality and Diversity Manager on 01753 875069 for advice.
- Assess any potential impacts, positive and negative, in a proportionate way and with relevance
- Make decisions that are justified, evidenced, relevant and identify any mitigating proposals
- Prioritise expenditure in an efficient and fair way
- Have a record showing that the potential impacts have been considered and that decisions are based on evidence

It is important the EIA is carried out at the earliest opportunity to ensure that you have the time to undertake any additional work that will inform your decisions, for example community engagement.

All relevant committee reports should include an equalities impact assessment. This will ensure that equalities considerations are available for members to consider as part of the formal decision-making process. If your EIA is part of a Cabinet Report, please forward it to Democratic Services, along with your other committee paperwork. It is usual to publish the EIA with the other public papers in advance of a committee meeting. Please also remember to complete the EIA section of the report checklist and the EIA summary section on the report itself.

If you have any questions or concerns, please contact the Equality and Diversity Manager on 01753 875069.

Equality Impact Assessment

Directorate: Place	
Service: Strategy and Infrastructure – Transport	
Name of Officer/s completing assessment: Eddie Hewitt and Nisha Durgacharan	
Date of Assessment: 2nd February 2023	
Name of service/function or policy being assessed: E-Scooter Rental Trial and E-Bike rollout	
1.	<p>What are the aims, objectives, outcomes, purpose of the policy, service change, function that you are assessing?</p> <p>As of June 2020, electric scooter ('e-scooter') trials were permitted in local areas across the UK, as part of an emergency response to meet the transport and mobility needs of local areas and people, whilst also supporting a green recovery. These trials are within the scope of the Department for Transport's (DfT) Emergency Active Travel Plan. The Council submitted a successful application to participate in the trial, and since October 2020, has been hosting an e-scooter trial on behalf of the DfT. The DfT will determine the legislation of e-scooters once all their data has been evaluated, and in the meantime, continue to regulate all aspects of e-scooter trials nationwide.</p> <p>A bike loan scheme was delivered by ITS until September 2022 when the contract expired. The scheme was not generating any revenue and the infrastructure and bikes needed updating, therefore a decision was made to not renew the contract and re-tender to include a new scheme that included e-bikes and e-scooters. An e-bike scheme has never been delivered in Slough.</p> <p>The e-scooter and e-bike scheme objectives support almost all of the outcomes of Slough's 5 Year Plan (2020-2025), and Slough's Recovery Plan (2022-2025). The objectives of the e-scooter trial are to:</p> <ol style="list-style-type: none"> 1. Offer an alternative to making short journeys by car (addressing Climate Change Strategy, LTP4 objectives, contributing to improving local, regional and national social, economic and environmental outcomes) 2. Expand the choice for short journey connectivity to/from transport hubs, (addressing connectivity and accessibility issues) 3. Provide an alternative travel option where other transport services may be difficult to access (addressing accessibility and equity issues)

	<p>4. Offer an introduction to active travel by providing users with greater confidence to try out alternate options (addressing public health objectives to encourage active travel)</p> <p>5. Provide information and evaluation data to guide future development of future mobility schemes (addressing wider national objectives relating to environment, health and economic outcomes)</p> <p>The e-scooter trial and e-bikes scheme will be re-tendered in early 2023, for a period of 2+1+1 years. This provides an opportunity to include the findings of this EIA as formal tender requirements in the contract. As can be seen from the recent consultation on the e-scooter rental scheme, there are impacts on groups beyond the user base, and views are often divergent and strongly held.</p>
2.	<p>Who implements or delivers the policy, service or function? State if this is undertaken by more than one team, service, and department including any external partners.</p> <p>Slough Borough Council and the e-scooter operator/e-bike operator (previously Neuron Mobility) are jointly responsible for delivering a successful e-scooter / e-bike scheme. Ultimately, Slough Borough Council is accountable to its residents for the e-scooter trial and potential ongoing combined scheme, and providing data to the Department for Transport (DfT).</p>
3.	<p>Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc. Please consider all of the Protected Characteristics listed (more information is available in the background information). Bear in mind that people affected by the proposals may well have more than one protected characteristic.</p> <p>The overall finding to date is that the e-scooter trial has led to improvements for all who the e-scooter service in Slough, but amongst non-users the impacts are both positive and negative.</p> <p>The e-scooters (and e-bikes in future) are/will be relied upon by certain protected groups more than others. The relevant groups are expected to be affected as follows:</p> <p>Age: Younger people tend to use the e-scooters and e-bikes more than older people in Slough. Factors that may be behind this include how e-scooters and e-bikes are accessible via a smartphone app, the perceived risk of using an e-scooter and the physical ability required to ride one.</p>

Disability:

As above, people with disabilities are more likely to be non-users than those without disabilities. As such they are more likely to be affected by improper parking and dangerous riding of the e-scooters. This is true of many different types of disability including the partially sighted, the mobility impaired, and those with unseen disabilities.

Pregnancy and maternity:

There may be some specific impacts for this category, again relating to pavement access and the ability to push a pram / buggy around an improperly parked e-scooter.

Race:

No specific impacts associated with this category.

Religion and Belief:

No specific impacts associated with this category.

Gender Reassignment:

No specific impacts associated with this category.

Marriage and Civil Partnership:

No specific impacts associated with this category.

Sex:

Men tend to use e-scooter rental services more than women. A recent study by Steer Group and Dott, found that in the UK, 78.6% of users were male, slightly higher than the European average of 75.5%.¹ It is likely that the Slough userbase is also mainly male, and this hypothesis should be validated in future surveys.

Sexual orientation:

No specific impacts associated with this category.

¹ Closing the Gender Gap, Steer Group, April 2022, [link](#)

	<p>It should also be noted that the rental scheme is inaccessible for some due to specific requirements needed to take part. To use any rental e-scooter scheme in the UK, a provisional or full drivers' licence is required as set by the Government. The percentage of people holding driving licences will vary by protected characteristic and so it is likely that some groups will only experience the impacts of the service (positive and negative) as a non-user rather than as a user.</p> <p><i>Details relating to the nature of the various, expected impacts are set out in sections 4 and 5 below.</i></p>
4.	<p>What are any likely positive impacts for the group/s identified in (3) above? You may wish to refer to the Equalities Duties detailed in the background information.</p> <p>The positive impacts for all groups identified above <i>including users and non-users</i>, are likely to be:</p> <ul style="list-style-type: none"> • An improvement in the local air quality, supporting those most at risk from the impacts of pollution. Data from surveys conducted in Slough indicate that between 38.4% and 48.9% of e-scooter journeys would have otherwise been taken in a car. Using the lower rate of 38.4%, this has resulted in an estimated 670,000 fewer car miles, 66,000 tonnes of CO² saved and an improvement in air quality (percentage amount to be confirmed) in Slough's AQIAs. • A reduction in congestion and an improvement in the amenity of the town. An estimated 209,000 car trips have been avoided by people choosing e-scooters instead. <p>The positive impacts for all groups identified above <i>who use the service</i>, are likely to be:</p> <ul style="list-style-type: none"> • A more affordable travel option for people with low incomes and those without access to a car. Most (63.7%) of the e-scooter users considered the scheme to offer good value for money.² • Improved access to services, places of work and education, shops, healthcare, and other destinations. A survey conducted by Neuron found that 10.8% of trips would not have been made at all had the e-scooter not been available.³ • Providing more transport choice for those who do not have easy access to other transport services. • An enjoyable form of transport that could improve people's mental health. Survey data from micromobility operator Spin found that 70% of respondents believe riding an e-scooter via a hire scheme helps improve their mental health and that people have highly positive associations with how they feel when they ride a hired e-scooter⁴

² Slough Borough Council e-scooter rental survey, August 2022

³ Neuron e-scooter survey

⁴ <https://www.spin.app/blog-posts/good-for-the-planet-good-for-the-mind-70-percent-of-e-scooter-hire-scheme-users-say-riding-helps-improve-their-mental-health>

- A legal mode of transport for those who wish to travel by e-scooter, and who may otherwise illegally ride a private e-scooter

Nb the above lists of likely benefits are not exhaustive.

Other likely benefits or aspects which are particularly relevant to the specific groups identified are as follows:

Age

London Cycling Campaign states that for older people, e-scooters provide an opportunity to improve independence for those who would not otherwise be able to complete a longer journey by foot or bicycle⁵. These views are supported by research from the University of Salford which found that e-scooters can provide a kind of mobility aid for people with otherwise limited mobility⁶.

Disability

As above, similar benefits will arise as for older people. Some groups such as Transport for All, and TfL's Independent Disability Advisory Group state that e-scooters can be beneficial for those with low energy.⁷

Pregnancy and those with young children

Consultation conducted by TfL with Tommy's, a group representing pregnant women, highlighted that e-scooters could aid women who are suffering from pelvic pain, but that this is likely to be limited. 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.⁸ The report also highlights that pregnant women who are exposed to polluted air are more likely to give birth prematurely, and have small, low birth weight children. The report found 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.

Race

Further studies will be carried out as part of the e-scooter and e-bike scheme to see if there is a correlation between lower car ownership or lower income and Race.

⁵ <https://www.london.gov.uk/about-us/londonassembly/meetings/documents/s82223/Appendix%20%20-%20Micromobility%20and%20Active%20Travel%20in%20the%20UK.pdf>

⁶ <http://usir.salford.ac.uk/id/eprint/62888/1/Sherriff%20et%20al%202022%20E-Scooters%20in%20Greater%20Manchester%20-%20Second%20Interim%20Report%20revised.pdf>

⁷ <https://content.tfl.gov.uk/rental-e-scooter-trial-oct-2022.pdf>

⁸ <https://unfccc.int/news/polluted-air-affects-more-than-90-of-children>

	<p>Religion and Belief</p> <p>Further studies will be carried out as part of the e-scooter and e-bike scheme to see if there is a correlation between lower car ownership or lower income and Race.</p>
5.	<p>What are the likely negative impacts for the group/s identified in (3) above? If so then are any particular groups affected more than others and why?</p> <p>There are several likely negative impacts to the above groups. These have been grouped into four main impacts, with the groups most likely affected mapped to each impact.</p> <ol style="list-style-type: none"> 1) Exclusion from the trial due to barriers in terms of accessibility, affordability, language, and requirement for a smartphone, bank account or driving licence. Hypotheses and evidence: <ol style="list-style-type: none"> a. Those on low incomes find the cost of using e-scooters a deterrent to use b. Older people, people on low incomes and people with disabilities are less likely to have a driving licence, smartphone or bank account which is needed to use the e-scooters <p><i>Affected groups: Older, disability, low income, homeless, refugees</i></p> 2) Accidents whilst riding a rental e-scooter or e-bike and subsequent higher level of injury than other groups. Hypotheses and evidence: <ol style="list-style-type: none"> a. Older people have reduced bone density which can lead to more severe breaking of bones b. Younger people can have less road and safety awareness c. Centre of balance changes for pregnant women which increases risk of falls and more at risk to wrist/ankle injuries due to softened ligaments. Tommy's, a pregnant women's group, told TfL that e-scooters need to be used with care by pregnant women as their centre of balance changes as their pregnancy develops and risks of falls increase. While no such accidents have been reported in the Slough trial, this remains a risk factor. <p><i>Affected groups: Older, younger, pregnancy</i></p>

	<p>3) Severity of injury to pedestrians resulting from a collision with a rental e-scooter or e-bike. This could be due to improper riding or parking such as pavement riding, parking outside of bays where e-scooter/e-bikes become street clutter. There is a risk of both e-Scooters and e-Bikes being left carelessly by users on the pavement, thus causing obstacles, with particular implications for the relevant protected groups identified.</p> <ul style="list-style-type: none"> a. As above, pregnant women and older people can suffer disproportionately from a collision or fall b. Younger people can have less road and safety awareness c. Impingement on pavement space can make it more difficult for people with disabilities to get around d. People with disabilities and older people may find it more difficult to see, hear and move out of the way of e-scooters <p><i>Affected groups: Older, younger, pregnancy, disability</i></p> <p>4) Fear of going out due to perceived risk of a collision with a rental e-scooter</p> <ul style="list-style-type: none"> a. Fear of experiencing a collision for these groups can lead to a loss of independence for getting around b. Pregnant women may feel 'extra safety conscious'
6.	<p>Have the impacts identified in (4) and (5) above been assessed using up to date and reliable evidence and data? Please state evidence sources and conclusions drawn (e.g. survey results, customer complaints, monitoring data etc).</p> <p>In preparing the revised e-scooter and e-bike ITT and contract, the Council has taken into account all relevant and available data sources, including data from Neuron, the former e-scooter operator. Some data from Neuron has not been obtained, and so this should be captured in future Council surveys, and via the successful operator as part of the next phase of the trial. This data includes demographic data on the Slough riders, the number of unique riders to date, and detailed breakdown of accidents (times, locations, demographics etc). The analysis of this data is therefore not yet complete.</p> <p>Regarding other sources: The Council's e-scooter consultation has proved to be the best source of information for many of these impacts, with the free text response box providing evidence and examples of these impacts. The main themes of these responses were:</p> <ul style="list-style-type: none"> • Where e-scooters are ridden (including objections to riding on both the pavement and road) • Young People • Improper parking

	<p>Responding to customer complaints has also formed part of the impact assessments. The main themes of these complaints, as reference in the e-scooter evaluation report, have been:</p> <ul style="list-style-type: none"> • improper parking, • underaged riding and • general objections to the scheme. <p>The next phase of the trial will provide the council with a richer dataset to evaluate many of these impacts on specific groups.</p>
7.	<p>Have you engaged or consulted with any identified groups or individuals if necessary and what were the results, e.g. have the staff forums / unions / community groups been involved?</p> <p>Groups consulted</p> <ul style="list-style-type: none"> • Ward councillors (Neuron and officers have consulted Councillors as required) • Neighbourhood Watch Groups (Neuron have participated in these as required) • Thames Valley Police. Both Neuron and Council Officers have collaborated closely on specific issues during and prior to the scheme starting • Schools and colleges. Neuron placed no parking zones around these institutions to prevent parking at school drop-off and pick up times. These activate only during these times to limit disruption to users at other times. • Disability groups – Council officers have had meetings with RNIB and are planning to engage directly with different stakeholders to understand the needs of this group. <p>Survey responses indicated that there is concern amongst non-users that pavements will be blocked, due to e-Scooters being left carelessly. Mitigation measures are referred to in section 9 below.</p> <p>Groups not consulted</p> <ul style="list-style-type: none"> • Pregnancy / maternity groups • Older and younger groups <p>Where council resource has not allowed for consultation with specific groups, secondary research of other e-scooter trials has helped identify likely impacts on these groups. The intention is to engage with these groups where possible, and that this engagement will continue throughout the remainder of the trial.</p>

8.	<p>Have you considered the impact the policy might have on local community relations?</p> <p>Through the revised mitigations in Q9 below, the next phase of the trial is expected to lead to marked improvements in community relations]. This will be supported by ongoing engagement and further consultation as and where appropriate.</p>
9.	<p>What plans do you have in place, or are developing, that will mitigate any likely identified negative impacts? For example what plans, if any, will be put in place to reduce the impact?</p> <ul style="list-style-type: none"> • Council Officers to carry out visual audits to ensure compliance with the contract • Tougher sanctions on those who are not compliant • Contract preparation will include requirements for safety improvements, including commitment to measures to improve safety of parking. To address the specific issue of e-Scooters and e-Bikes being left carelessly placed across the pavement (and hence being an obstacle to pedestrians), all appropriate mitigation measures will be put in place. Full consideration will be given to the installation of fixed docking bays for parking of e-Scooters as well as e-Bikes, particularly in areas of high footfall including prominent town centre locations, and geo-fencing for other less heavily accessed locations and routes. Mitigation measures will be in line with DfT guidance and ongoing engagement with the community, particularly representatives of protected groups, including (but not limited to) RNIB and similar groups, as well as community police officers. In the first instance, all mitigation measures will be fully explored and confirmed as part of the contract preparation. This will take into account the overall attractiveness of the proposition to potential bidders to run the scheme, however safety will remain paramount in all aspects of operations.
10.	<p>What plans do you have in place to monitor the impact of the proposals once they have been implemented? (The full impact of the decision may only be known after the proposals have been implemented). Please see action plan below.</p> <ul style="list-style-type: none"> • Council Officers to have regular monitoring meetings with the operator • Improved reporting – frequency and detail of the reporting to ensure the it meets the requirements set out in the contract • Site visits across the borough to assess usage and operations of the e-Scooters and e-Bikes, including parking and interaction of the e-vehicles with pedestrians / road users.

What course of action does this EIA suggest you take? More than one of the following may apply	
Outcome 1: No major change required. The EIA has not identified any potential for discrimination or adverse impact and all opportunities to promote equality have been taken	
Outcome 2: Adjust the policy to remove barriers identified by the EIA or better promote equality. Are you satisfied that the proposed adjustments will remove the barriers identified? (Complete action plan).	✓
Outcome 3: Continue the policy despite potential for adverse impact or missed opportunities to promote equality identified. You will need to ensure that the EIA clearly sets out the justifications for continuing with it. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact (see questions below). (Complete action plan).	
Outcome 4: Stop and rethink the policy when the EIA shows actual or potential unlawful discrimination. (Complete action plan).	

Action Plan and Timetable for Implementation

At this stage a timetabled Action Plan should be developed to address any concerns/issues related to equality in the existing or proposed policy/service or function. This plan will need to be integrated into the appropriate Service/Business Plan.

Action	Target Groups	Lead Responsibility	Outcomes/Success Criteria	Monitoring & Evaluation	Target Date	Progress to Date
Assess any impact e-bikes and e-scooters will have on disability groups by setting up stakeholder forum/meetings. Specific reference to parking of e-	Disability groups/RNIB	Nisha Durgacharan	<ul style="list-style-type: none"> Regular stakeholder meetings Reduction in complaints from disability groups 	Surveys Stakeholder engagement meetings	September 2023	Met with RNIB and had initial discussions. Further meetings planned with a transport advisor at

scooters / e-bikes (as obstacles) on the public highway including footways.						RNIB
Identify local groups to carry our surveys (again, specific reference to obstacles on the public highway).	Pregnancy/Maternity groups. People with sight disabilities. The elderly.	Nisha Durgacharan	<ul style="list-style-type: none"> Regular surveys Discussion sessions at relevant groups 	Surveys	September 2023	
Provision within the ITT documentation for the contract to include all necessary safety improvements. This will be in line with the DfT guidance and ongoing public engagement.	All, with specific focus on people with disabilities, parents of young children, and the elderly.	Nisha Durgacharan	Comprehensive documentation suite including reliable and legal contract, in line with Procurement guidelines, attractive to potential bidders and overall fit for purpose.	ITT / Contract preparation and bid evaluation	February to April 2023	In progress
Installation of mitigation measures, expected to include fixed docking bays and	All, with specific focus on people with disabilities, parents of young children, and the elderly.	Nisha Durgacharan	Safe practices on the public highway, with minimum risk to all pedestrians, with particular focus on specific protected	Reports and ongoing monitoring / site visits	Installation of measures – part of the mobilisation for the start	ITT preparation in progress

geo-fencing. (with reference to above contract commitments and related requirements, including financial viability).			groups.		of scheme operations	
Post start-up and ongoing monitoring of the scheme impacts. Regular reporting and scheme management meetings between SBC and the Operators.	All	Nisha Durgacharan	Compliance with safety requirements. Limited need for further intervention. Successful scheme operation overall.	Reports and ongoing monitoring / site visits		June 2023 onwards
Ensure SBC website is updated with information for disability groups on e-Scooters and e-bikes.	All	Nisha Durgacharan	<ul style="list-style-type: none"> Information available for all on website. 		June 2023	RNIB have provided us with information which we can adapt and use.

<p>Name: Eddie Hewitt Signed: E. C. T. Hewitt</p> <p>(Person completing the EIA)</p> <p>Name: Misha Byrne, Transport Lead</p> <p>Signed:</p> <p>.....(Policy Lead if not same as above)</p>						
Date: 2nd February 2023						