

Equality Impact Assessment [version 2.9]



Title: Expansion of e-scooter on-street rental trial area	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input checked="" type="checkbox"/> Other [please state] <i>Enabling private operator/ Government trial – (not BCC commissioning or delivering a service)</i>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Growth & Regeneration	Lead Officer name: Matthew Barrett
Service Area: Economy of place / City Transport	Lead Officer role: Group Manager

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

A trial of on-street e-scooter rental has been underway in Bristol for the past 15 months and currently covers around 2/3 of the city. It is proposed to extend the on-street operating area to cover the rest of the city. A lease element of the trial already covers the whole city.

The current on-street e-scooter rental scheme is part of a Department for Transport (DfT) trial in over 30 towns and cities. WECA are co-ordinating the trial in the sub-region. WECA hold the contract with the scooter operator (Voi) and report to DfT. The local authorities are working in partnership with WECA and Voi and are primarily assisting with operational management issues such as parking. The trial scheme was launched in October 2020, and currently will run until the end of November 2022. The rental e-scooter scheme has proven to be popular with many people, with more than 3 million rides and nearly 8 million km travelled in the Bristol / South Gloucestershire area so far in the trial (October 2020- early January 2022).

There is already an existing EQIA and equalities stakeholder group facilitated by WECA as the contract manager that the participating authorities are actively involved in, but as the proposed extension will be a key decision it requires an EQIA screening for that report.

The main issues with e-scooter rental relate to parking and obstructing of pavements, inconsiderate rider behaviour (including riding on pavements), and being unable to access to use the service (through location, affordability or inability to physically ride them), and rider safety.

These issues are being monitored and managed through WECA as the contract holder and through their stakeholder engagement process.

The main issue with these schemes is parking. Scooter parking hubs in Bristol are currently on the footways. There are also issues with rider behaviour such as riding on pavements, which cause concern for pedestrians, wheel chair and pram users who require a larger amount of the pavement. Footway parking issues can include poor siting of parking locations, over-crowding of parking locations causing obstructions, and people not parking properly and causing obstructions or trip hazards.

Many of the issues encountered in the early stages of the trial such as overcrowding of parking locations and poor parking and rider behaviour appear to have reduced in scale as the scheme has become more established. Improvements to Voi's parking management systems have significantly reduced the level of parking issues, and work is continuing to improve these further and to address issues of poor rider behaviour. The current parking hubs are "virtual" and are located using the operator's app and are not physically marked on street.

Poor parking is currently being mitigated through improving the operator's selection of locations, capping the number of scooters at each parking location, warning or penalising riders who do not park properly, and the operator's staff de-cluttering parking locations.

It is planned to undertake a trial of on-street parking to replace pavement parking, and this will inform future parking strategies, but this will not be delivered at scale during the remaining trial period, and the parking for the proposed expansion will be on pavements as it is with the current operating area.

1.2 Who will the proposal have the potential to affect?

<input type="checkbox"/> Bristol City Council workforce	<input type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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There will be impacts on all users of pavements (and particularly for wheel chair users, partially sighted and older and less mobile people), and potential benefit for some people who may use the rental schemes. There may also be some more general concerns on highways – i.e when people are crossing the roads or riding or driving and rider safety.

The service may not be accessible to all. E-scooters are classed as motor vehicles and require a UK driving licence to use them (including provisional a licences). Some people may not be able to afford to use the service, or may be excluded because of impairments that mean they are unable to balance or ride them.

Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: <https://www.bristol.gov.uk/people-communities/measuring-equalities-success>.

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment Form](#)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
WECA stakeholder group	General issues raised around pavement parking and obstructions, and enforcement as well as poor or illegal rider behaviour. There is a strong preference for physical parking hubs rather than virtual ones, and a strong view that parking should be on-road on not on pavements.
Complaints (to BCC, Voi and WECA)	That there are issues relating to parking and user behaviour that need to be managed. In the earlier phases of the trial a lot of these related to poorly sited parking hubs and not being able to cap the number of scooters at each location. Complaints relating to specific locations have generally been mitigated by amending the parking hub, capacity or removing the hub. Work is ongoing on influencing rider behaviour and looking at different parking options.
Additional comments: There is an ongoing WECA stakeholder group and monitoring programme. WECA is leading this project with BCC assistance, and they lead on the EQIA, engagement, management and monitoring of the e-scooter trial, and on reporting to the Department for Transport.	

2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input type="checkbox"/> Disability	<input type="checkbox"/> Gender Reassignment
<input type="checkbox"/> Marriage and Civil Partnership	<input type="checkbox"/> Pregnancy/Maternity	<input type="checkbox"/> Race
<input type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input type="checkbox"/> Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

Evidence on scheme and some operational metrics are very good, however quantitative evidence on adverse impacts is limited. There are clearly issues with parking and rider behaviour which appear to be reducing. Complaints are logged and dealt with, but many issues will not be reported. WECA have appointed the University of West of England to undertake monitoring and evaluation of the project. We currently do not have any data on service users apart from the sex and age. We need to improve the data collected for these groups so a better analysis on whether other equality groups are impacted by this scheme. The detail in this EQIA focuses on impact on citizens rather than users and should include both.
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2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See <https://www.bristol.gov.uk/people-communities/equalities-groups>.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing change or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

There is ongoing consultation throughout the trial as part of the WECA equalities and stakeholder engagement, as well as engagement by WECA with the wider public. The WECA equalities group has been consulted on the proposed expansion of the operating area. From the responses there is a very strong view that e-scooters should be parked on the roads and not on pavements where they can cause a barrier to the safe movement of pedestrians, particularly to people with visually impairments, mobility issues, older people and pram users. There were calls for tighter parking regulations and calls for the operator to do more to resolve poor parking and obstructions. Doubts were expressed about the contribution e-scooters are making to climate and transport objectives, and concerns that the lack of noise caused issues for visually impaired people as well as driver safety.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

Through the WECA stakeholder group which meets monthly.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)	
Parking trip hazards blocking the footway and poor / illegal riding behaviour- e.g riding on pavements or inconsiderately on the roads.	
PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Younger people who do not hold a provisional or full driving licence will be unable to use the scheme (however the majority of riders using the scheme are in the 18-30 age range)
Mitigations:	N/ A

Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Poorly parked e-scooters can block the footway, cause potential trip hazard as older people are more likely to be involved in trips, possibility of collision caused by aggressive, inconsiderate or inexperienced riders, riders on the footway.
Mitigations:	The operator is required to work within agreed parking standards, messaging and education to customers, fine customers who mis-park scooters, enforcement, engineered solutions for parking on street.
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Visual impairment those with difficulties walking : may be more likely to trip on badly parked e-scooters. Wheelchair users: potential for blocking footway or entrance to buildings and services. Some groups may be more badly affected by poor rider behaviour. Some disabled people have reported on social media that the scheme has improved their ability to travel.
Mitigations:	Parking standards for locating hubs on footways, messaging and education to riders to park considerately, enforcement, formalised parking and on-road (subject to feasibility work and Cabinet approval) parking, removing parking hubs at locations with repeat problems.
Sex	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Around 30% of the trips in the trial are made by female riders. More men ride scooters than women.
Mitigations:	
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Potentially – same issues as for disability - Blocking footway, trip hazard, pavement riding.
Mitigations:	Parking standards, messaging and education, enforcement, engineered parking,
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Some potential users may not be able to afford to use the rental scooters
Mitigations:	Operator offers a 50% discount for people on low incomes.
Carers	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Other groups [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Looked after Children / Care Leavers; Homelessness]	
Potential impacts:	
Mitigations:	

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

It offers improved travel options for many people who may live in areas of poor accessibility or have limited transport options. It can benefit some people who are disabled or other issues that mean that driving or other transport modes are not an option for them.

Expanding the operating area will extend these benefits to residents and visitors across the whole of the city.

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:

The main negative impacts are those caused by parking issues. Either by badly located parking hubs or by inconsiderate parking by users. The other main concern is around issues caused by behaviour of riders whilst riding. As the trial has been underway for 15 months changes have been made that have reduced some of these impacts over that period, and work will continue to identify ways to further reduce these issues where possible. Poor road user- behaviour is common across all transport modes and will never be eliminated.

The learning from the trial to date means that the operations in the expanded areas should have fewer issues than the earlier phases of the trial, and that systems are in place to deal with some of the potential issues should they occur.

Poor parking is currently being mitigated through improving the operator's selection of locations, capping the number of scooters at each parking location, warning or penalising riders who do not park properly, and the operator's staff de-cluttering parking locations.

The safety of e-scooters is an ongoing concern, and Voi are working on programmes to improve rider safety.

However not all issues will be mitigated. This scheme is part of a government trial of rental e-scooters and evidence gathered from these schemes, including any adverse impacts will help to guide future policy and decisions on e-scooter schemes at a national and local level.

In addition, we should be mindful that we do not have enough data about other equality groups who may use scooters however, there is a plan to collect this information in the future. We also are not aware of which wards these scooters are used most frequently, this will provide additional information about the service user, and whether deprived areas of Bristol use scooters more or less than others. These things will help us build a picture of the service user.

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

The scheme will improve travel options for many people in the city and may have benefits for some people with mobility issues and those without access to a car. The 50% discount scheme for people on lower incomes will increase accessibility to this service.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Parking guidelines regularly reviewed, and pilot of on-street parking due to start shortly with a view to informing future parking strategies and removal of e-scooter parking from many pavements and relocating them to parking hubs on the roads.	Group Manger – Sustainable Transport / WECA	Ongoing review of parking guidelines, Pilot parking scheduled for Spring 22 (subject to approvals)
Continue to work with rental operator to improve parking locations and parking compliance. Actioning measures at specific parking locations where problems are reported (including potential removal of problem parking hubs)	Group Manger – Sustainable Transport / WECA	Ongoing (meet weekly to resolve issues)
Improved rider messaging and enforcement, and safety improvements	WECA project manager / E-scooter operator	Ongoing (meet weekly to resolve issues)
More information about the protected characteristics of users will need to be collected, to enable a proper analysis of the user impact of this trial. This should include local ward data.	WECA project manager / E-scooter operator	Ongoing (meet weekly to resolve issues)


4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

Through the WECA / DfT e-scooter monitoring programme, stakeholder group and through complaints/ reporting of incidences to BCC.

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the [Equality and Inclusion Team](#) before requesting sign off from your Director¹.

Equality and Inclusion Team Review: Reviewed by the Equality and Inclusion Team	Director Sign-Off: 
Date: 21 February 2022	Date: 28/02/2022

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.