

Equality Impact Analysis Tool

Conducting an Equality Impact Analysis

An EqIA is an improvement process which helps to determine whether our policies, practices, or new proposals will impact on, or affect different groups or communities. It enables officers to assess whether the impacts are positive, negative or unlikely to have a significant impact on each of the protected characteristic groups.

The tool has been updated to reflect the new public sector equality duty (PSED). The Duty highlights three areas in which public bodies must show compliance. It states that a public authority must, in the exercise of its functions, have due regard to the need to:

- 1. Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;**
- 2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;**
- 3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.**

Whilst working on your Equality Impact Assessment, you must analyse your proposal against the three tenets of the Equality Duty.

General points

1. In the case of matters such as service closures or reductions, considerable thought will need to be given to any potential equality impacts. Case law has established that due regard cannot be demonstrated after the decision has been taken. Your EIA should be considered at the outset and throughout the development of your proposal, it should demonstrably inform the decision, and be made available when the decision is recommended.
2. Wherever appropriate, the outcome of the EIA should be summarised in the Cabinet/Cabinet Member report and equalities issues dealt with and cross referenced as appropriate within the report.
3. Equalities duties are fertile ground for litigation and a failure to deal with them properly can result in considerable delay, expense and reputational damage.
4. Where dealing with obvious equalities issues e.g. changing services to disabled people/children, take care not to lose sight of other less obvious issues for other protected groups.
5. If you already know that your decision is likely to be of high relevance to equality and/or be of high public interest, you should contact the Equality Officer for support.
6. If your EqIA does not require you to carry out additional consultation, please omit section 04.
7. Further advice and guidance can be accessed from the separate guidance document ([link](#)), as well as from your service or borough lead:

EQIA updated 15.7.2022

Background data

Since the trial was launched in June 2021 TfL has published data on the progress of the trial.

The trial is being measured in four week trial periods, TfL has published this data up to the end of Trial Period 13 – May/June 2022

Table 1: London e-scooter trial headline metrics

	Trial Period 1	Trial Period 2	Trial Period 3	Trial Period 4	Trial Period 5	Trial Period 6	Trial Period 7	Trial Period 8	Trial Period 9	Trial Period 10	Trial Period 11	Trial Period 12	Trial Period 13	Total / Average
Dates ¹	07 June – 04 July 2021	05 July – 01 August 2021	02 – 29 August 2021	30 August – 26 Sept 2021	27 Sept – 24 Oct 2021	25 Oct – 21 Nov 2021	22 Nov – 19 Dec 2021	20 Dec 2021 – 16 Jan 2022	17 Jan – 13 Feb 2022	14 Feb – 13 Mar 2022	14 Mar – 10 Apr 2022	11 Apr – 08 May 2022	09 May – 05 Jun 2022	
Permitted fleet size ²	600	1,200	2,700	2,835	3,480	3,585	3,585	3,585	3,585	3,885	4,010	4,010	4,100	
Total trips ³	35,000	50,000	80,000	95,000	100,000	90,000*	70,000*	60,000*	75,000	80,000	95,000	130,000	145,000	1,105,000
Average trip distance	2.9 km	2.7 km	2.8 km	2.8 km	2.5 km	2.5 km	2.4 km	2.5 km*	2.4 km	2.4 km	2.5 km	2.6 km	2.6 km	2.6 km
Average trip duration	24 mins	22 mins	21 mins	22 mins	18 mins	18 mins	17 mins	18 mins*	16 mins	16 mins	16 mins	17 mins	17 mins	19 mins
Serious injuries reported by operators ⁴	1	2	2	1	3	0	4	1	1	0	1	0	2	18

*Corrections have been made to trip stats previously published for Trial Periods 6, 7 and 8 to account for a data quality issue which has been identified and fixed

From: [London E-scooter Rental Trial Headline Metrics - Trial Period 12 \(tfl.gov.uk\)](https://tfl.gov.uk)

The trial was launched with a planned duration of 12 months, however a contractual option to extend the trial has been exercised, that extension will see the trial operating to late November 2022. The future of the trial, or what may come after the trial concludes, remains uncertain.

Participating boroughs

Table 2: Participating boroughs⁵

Trial Period 1	Trial Period 2	Trial Period 3	Trial Period 4	Trial Period 5	Trial Periods 6-12
Ealing	City of London	City of London	City of London	Camden	Camden
Hammersmith & Fulham	Ealing	Ealing	Ealing	City of London	City of London
Kensington & Chelsea	Hammersmith & Fulham	Hammersmith & Fulham	Hammersmith & Fulham	Ealing	Ealing
Richmond upon Thames	Kensington & Chelsea	Kensington & Chelsea	Kensington & Chelsea	Hammersmith & Fulham	Hammersmith & Fulham
Tower Hamlets (incl. Canary Wharf estate)	Lambeth	Lambeth	Lambeth	Kensington & Chelsea	Kensington & Chelsea
	Richmond upon Thames	Richmond upon Thames	Richmond upon Thames	Lambeth	Lambeth
	Southwark	Southwark	Southwark	Richmond upon Thames	Richmond upon Thames
	Tower Hamlets (incl. Canary Wharf estate)	Tower Hamlets (incl. Canary Wharf estate)	Tower Hamlets (incl. Canary Wharf estate)	Southwark	Southwark
		Westminster	Westminster	Tower Hamlets (incl. Canary Wharf estate)	Tower Hamlets (incl. Canary Wharf estate)
				Westminster	Westminster

- There are now ten participating boroughs and 1,105,000 e-scooter trips have been recorded. Over the whole trial average trip duration is 19 minutes and average trip distance is 2.6km.
- The combined e-scooter fleet size across London has increased from 600 to 4,010.
- In RBKC scooter parking capacity has increased from 237 scooters in 19 bays to 418 scooters in 34 bays.
- 18 serious injuries and 0 fatalities have been reported by operators to TfL across the total trial area and period, we are not aware of any serious injury occurring in RBKC as a result of the trial.
- Of those 18 serious injuries 16 are to e-scooter riders and two are to pedestrians, both of the injured pedestrians were reported as being involved in a single incident.
- The borough continues to monitor and consider all comments and complaints received relating to the trial. Whilst complaints have been few in number, where appropriate action has been taken to resolve issues, for example agreeing with suppliers the establishment of a curfew on the late-night servicing of parking bays where such servicing was causing a disturbance in residential areas. Since the launch of the trial the borough has received 23 complaints about the locations of 13 of the parking bays provided to suppliers. Only one bay has received more than two complaints, and in that case all suppliers have agreed to a complete halt to night-time servicing of the bay.
- Seven further complaints have been received which are not about a specific location or incident but expressed dissatisfaction with the introduction or delivery of the trial.

Consultation

Consultation with interested groups has continued across the London wide trial and in the borough.

London wide consultations have been held with TfL and suppliers meeting with Guide Dogs UK, London Visual Impairment Forum, London Sight Loss Council, Independent Advisory Group (IDAG), Valuing People (Learning Disabilities group) and the TfL Inclusive Transport Forum. Notes on key outcomes from those meetings can be found in the TfL EQIA here [Rental Escooter Trial 2022 \(tfl.gov.uk\)](https://www.tfl.gov.uk/equality/rental-escooter-trial-2022)

The e-Scooter suppliers have attended borough meetings of the Public Transport Liaison Group and also with Action Disability Kensington and Chelsea at which they have outlined their equality policies, listened to concerns and responded to questions. Suppliers continue to be willing to attend such meetings. Suppliers have offered to attend events with e-Scooters, so that they can be demonstrated in a safe space, and also invited ADKC to participate in sessions related to the development out of an audio warning system that will improve safety amongst visually impaired pedestrians.

Equality Impact Analysis Tool

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	2020-21 Q4
Name and details of policy, strategy, function, project, activity, or programme	<p>Participation in Pan London hire e-Scooter Trial.</p> <p>Short summary: The Department for Transport has sanctioned trials of e-scooters rented for short trips in locations across the UK, facilitated by regulations which came into force on 4 July 2020. Transport for London, London Councils and London boroughs have worked together to develop a coordinated multi-borough trial in the capital and the Royal Borough has indicated an intention to take part in this trial. The use of privately owned e-scooters in public spaces remains illegal, but this trial will legalise the use, on the carriageway, of e-scooters that are provided by suppliers participating in the trial. The trial is expected to last for 12 months and approximately ten London Boroughs are planning to participate. In developing a specification for the trial Transport for London has engaged with protected groups, considered concerns expressed and written mitigating measures into the specification and contracts. Suppliers responses to those issues are being assessed in the procurement process, which is still underway, and will inform this selection of successful suppliers appointed to operate the trial.</p> <p>It is anticipated that the introduction of hire e-Scooters will provide a valuable alternative to public transport and motor car use during the current pandemic, and in the longer term will contribute to a reduction in private car traffic and an improvement in air quality and congestion.</p> <p>A participating borough working group will be an important part of governance of the trial and EQIA matters will be an agenda item for that group, allowing for the rapid escalation and discussion of any issues arising.</p>
Lead Officers	<p>Name: Neil Simpson Position: Road Safety Officer Email: neil.simpson@rbkc.gov.uk Telephone No: 020 7361 3628</p>
Lead Borough	Royal Borough of Kensington and Chelsea
Date of completion of final Full EIA	12 February 2021. Updated 15 July 2022

Section 02	Scoping of Full EIA
Plan for completion	Timing: Scheme development February and March 2021, Implementation from April 2021

Analyse the impact of the policy, strategy, function, project, activity, or programme

Analyse the impact of the policy on the protected characteristics (including where people / groups may appear in more than one protected characteristic). You should use this to determine whether the policy will have a positive, neutral or negative impact on equality, giving due regard to relevance and proportionality.

Protected characteristic	Borough Analysis	Impact: Positive, Negative, Neutral
Age	<p>Riders wishing to hire an e-Scooter will be required to provide proof of possession of a valid provisional or full driving licence, this enforces a minimum age of 16 years on riders, and as riders will mix with traffic on the carriageway this is seen as an important safety measure. Applying for a provisional driving licence currently costs £34. There will be no upper age limit on hiring an e-Scooter.</p> <p>Older pedestrians often express concern over the use of scooters, bicycles and e-Scooters on the footway. Such use is now and will remain illegal. The launch of the trial will be used by TfL as an opportunity to run a communications campaign highlighting this issue and seeking to reduce the incidence of footway riding. Boroughs will also have an opportunity to communicate this message. Enforcement activity will take place with Metropolitan Police cycle safety teams taking an active role in enforcing against privately owned and inappropriately used 'hire scheme' e-Scooters. Boroughs will be able to request attendance by the Met. Police at any locations that give cause for concern on this issue.</p> <p>Participation in the trial will give elderly residents access to a new transport mode which is physically undemanding, but is 'solo' and 'outdoor', reducing reliance on public transport.</p>	Neutral
Disability	<p>For some people with reduced mobility the introduction of a new low cost and easy to use mode of transport will be a welcome additional choice for local journeys, particularly when capacity of public transport is reduced. For others there will be concerns. E-Scooters are silent in operation and as such will be of concern to those with impaired hearing. In mitigation all e-Scooters on the trial must have lights on, front and rear, at all times whilst in motion, and all must be equipped with an audible warning device, a buzzer or bell, which can be used as a warning device.</p> <p>The maximum speed of the e-Scooters will be capped at 15.5mph, well below the 20mph for private motor vehicles on most borough roads, and it will be possible to introduce 'go-slow' zones where the borough can force suppliers to reduce speeds to 8mph, by geo-fencing an area of concern. Boroughs can also designate 'No Go Zones' and RBKC has opted to start with all Parks being so designated. No Go and Go Slow</p>	Neutral

		<p>zones can be added or amended at any point during the trial, and we will be monitoring the trial closely to assess the need to make such changes.</p> <p>The e-Scooters must be parked in marked bays, into which suppliers will deploy the vehicles and all journeys will begin and end. We have identified a network of parking locations across the borough and approximately 30 bays are proposed to be sited on the footway, this will be of concern to residents with a visual impairment. In mitigation the bays will be marked to the DfT approved specification and the sites have been individually assessed to be away from areas of high footfall, desire lines and crossing points.</p> <p>Most e-Scooters are operated in a standing position, however seated options do exist, and would serve to broaden the appeal of the service. We do not yet know whether any seated vehicles will be included within the trial, as suppliers and the vehicles they offer are still being selected by TfL.</p> <p>Participation in the trial will give some disabled residents access to a new transport mode which is physically undemanding, but is 'solo' and 'outdoor', reducing reliance on public transport.</p>	
	Gender reassignment	No impact	Neutral
	Marriage and Civil Partnership	No impact	Neutral
	Pregnancy and maternity	No impact	Neutral
	Race	<p>Bus use among BAME Londoners is higher than among white Londoners (68 per cent BAME compared with 57 per cent white Londoners using the bus at least once per week). At a time of Covid restrictions and reduced bus capacity BAME groups may therefore benefit from a alternative mode of transport.</p> <p>BAME communities tend to experience economic disadvantage, the supplier selection procedure insists that prospective suppliers <i>must</i> address this by offering equitable access plans to support the use of e-Scooters by disadvantaged groups. Such plans will address both the actual cost of the journey and also issues such as reliance on smartphones to access the service and non-bank account alternatives for payment. Final details of such schemes will not be available until suppliers have been selected.</p>	Neutral
	Religion/belief (including non-	No impact	Neutral

	belief)		
	Sex	No impact	Neutral
	Sexual Orientation	No impact	Neutral
<p>Human Rights or Children's Rights If your decision has the potential to affect Human Rights or Children's Rights, please contact your Borough Lead for advice</p>			

Section 03	Analysis of relevant data Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.
Documents and data reviewed	
New research	The e-Scooter trial is a rare opportunity to introduce a new mode of transport. It's a 12-month long experiment and as such monitoring will be detailed and continuous. Boroughs will have access to a dashboard with live data on usage, and regular project board meetings to discuss and resolve issues as they arise. There will also be research conducted with both users of the service and non-users to collect and consider their experiences and reactions to it. Participation in the trial gives us the opportunity to take an active role in that research.

Section 04	Consultation
	Complete this section if you have decided to supplement existing data by carrying out additional consultation.
Consultation in each borough	<p>It is proposed to publicise the trial shortly before it goes live, and to provide residents with an opportunity to provide feedback once the trial is operational in the borough through a dedicated email inbox.</p> <p>Some early discussion has taken place with Action Disability Kensington and Chelsea who noted some concerns about pedestrian safety, but the plan to participate in the trial was accepted, with members in agreement that it was better for the Council to take an active role in monitoring the new technology by way of a trial, rather than passively</p>

	<p>permitting e-scooter riders use parts of the borough without geofencing restrictions and a concerted campaign on safety. They were reassured that the Council would continue to have dialogue with ADKC and officers will continue to liaise with the group after the trial has begun.</p>
Analysis of consultation outcomes for each borough	

Section 05	Analysis of impact and outcomes
Analysis	<p>Officers believe the proposals have a neutral impact overall on protected groups and gives RBKC the opportunity to contribute to shaping the development of such services in the future.</p>

Section 06	Reducing any adverse impacts and recommendations
Outcome of Analysis	<p>Following analysis, an action plan to mitigate any adverse impacts is set out in Section 07 below.</p>

Section 07	Action Plan					
Action Plan						
	Issue identified	Action (s) to be taken	When	Lead officer and borough	Expected outcome	Date added to business/service plan
	Rider Safety	Monitor	Continuously throughout the trial period	Caroline Dubarbier RBKC	Identify and take action, locally or through the Pan London Project Board as appropriate, to resolve issues as they occur	

	Pedestrian Safety	Monitor	Continuously throughout the trial period	Caroline Dubarbier RBKC	Identify and take action, locally or through the Pan London Project Board as appropriate, to resolve issues as they occur	
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Section 08	
Chief Officers' sign-off	Name: Mahmood Sidiqqi Position: Director for Streets & Regulatory Services Email: Mahmood.sidiqqi@rbkc.gov.uk Telephone No: 0207 361 3589
Key Decision Report (if relevant)	Date of report to Cabinet/Cabinet Member: 25 February 2021 Key equalities issues have been included: Yes
Lead Equality Manager (where involved)	Name: Angela Chaudhry Position: Equality Officer for RBKC Date advice / guidance given: 11 February 2021 Email: angela.chaudhry@rbkc.gov.uk Telephone No: 020 7361 2654