



Advice for local authorities considering hosting e-scooter trials

You may be considering running an e-scooter rental trial programme in your local authority area. Micromobility vehicles such as e-scooters are extremely difficult for blind and partially sighted people to see, and operate quietly which also makes them difficult to hear. It may not always be obvious to someone driving a micromobility vehicle that they are approaching a pedestrian with sight loss. The difficulties in these two groups detecting one another make interactions between the two potentially dangerous.

The Department for Transport has approved specifications for e-scooters which are faster, heavier and have greater acceleration than in other European countries. We believe it is essential for local authorities to set additional local rules to make these vehicles safer for pedestrians with disabilities.

We have produced this advice to help local authorities consider how they might act to make these schemes more accessible. However, we remain concerned that even with these mitigations, these vehicles will still be likely to impact negatively on pedestrians.

Consultation with local disabled people

Under the Public Sector Equality Duty, you need to consider how people with protected characteristics may be affected by any temporary or permanent changes. Changes must not discriminate against blind and partially sighted people by, for example, placing them at a substantial disadvantage when accessing local amenities. Please consider how you will:

- **Conduct Equality Impact Assessments of rental e-scooter trials**, consulting with disabled people in an accessible way, and considering steps to mitigate against any negative impacts or making alternative proposals.
- **Conduct consultations with local disabled people**, including blind and partially sighted people, about decisions on where and how trial rental e-scooter schemes are set up. Local sight loss societies and

groups can be found by contacting Visionary or the Thomas Pocklington Trust, contact information below.

Parking

Dockless vehicles obstruct walkways and present dangerous trip hazards to pedestrians, particularly those with sight loss. For long-term use, accessibly designed fixed docking stations are the only safe parking solution for rental hire vehicles. However, if this isn't possible for short-term pilot rental schemes:

- **Create designated parking bays for e-scooters, where a detectable kerb (with a minimum height of 60mm) separates walkways from parked e-scooters.** Road car parking spaces should be repurposed for e-scooter parking as this will reduce the need for changes to infrastructure to create kerbs. E-scooter operators can pay local authorities for the use of road car parking spaces so no revenue from these is lost.
- **Strong mechanisms to enforce compliance with parking rules should be written into tender and contract documents.**
- **Monitoring of adherence to parking requirements is essential,** and plans should be in place to move any e-scooters not parked in a designated bay as quickly as possible to avoid pavement obstructions.
- **Consider instating a cap on e-scooter numbers to ensure that parking facilities are not overwhelmed.**

Infrastructure

Having accessible and reliable infrastructure in place is crucial for ensuring the safety of disabled pedestrians. For example:

- **Pavements and footways with a detectable kerb with a minimum height of 60mm, and accessible, signal-controlled pedestrian crossings (such as pelican crossings), with correctly installed tactile paving,** on roads and cycleways, are essential for blind and partially sighted people to navigate safely and independently.
- **Street and infrastructure designs which encourage pedestrians to share space with cycles are inaccessible** (such as 'shared spaces', mini Hollands, bus stop bypasses/borders/floating bus stops, and Toucan crossing points) because they force blind and partially sighted people to mix with fast moving vehicles they cannot see or hear.

- **Until shared-space and mixed-use areas are made accessible with detectable kerbs e-scooters must not be allowed in these areas** as there will be a high risk of collision.
- **Where changes have been made to street design or use, these must be clearly and accessibly communicated to local blind and partially sighted people.** For example, new cycleways on roads or changes in vehicle direction can be dangerous for people with sight loss trying to safely cross because it is so difficult for them to detect silent vehicles like bicycles and e-scooters.
- **Careful consideration should be given to which areas should be restricted access for e-scooters,** such as near to hospitals, shared use spaces, around schools, shopping centres, pedestrian zones, or areas with high numbers of disabled or elderly people.
- **Prioritise e-scooter operators that can offer technological solutions to driver behaviour issues like bluetooth beacons or geofencing to stop e-scooters driving in restricted areas and restrict speeds in areas where this would be appropriate.**

Robust enforcement

Driver behaviour will be essential to the success of any e-scooter trials and so conversations with police and operators about how to encourage and enforce safe behaviours will be essential. Pavement cycling already has a severe impact on blind and partially sighted pedestrians, despite that fact that it is illegal. Without robust enforcement, e-scooters are likely to further compound this and take away people's independence.

- **Work with operators and the police to define how you will proactively enforce the rule prohibiting e-scooters on pavements with points on licence and fines.** Consider how this fits with tackling the behaviour of private e-scooter owners.
- **Make ongoing liaison, data collection, and reporting to local authorities and police about driver behaviour part of tender and contract documents with e-scooter operators.** This should include information about riding on the pavement and parking in designated bays.
- **Robust and prompt enforcement of any e-scooter not parked in a designated bay will be essential to the success of any scheme and preventing e-scooters becoming a nuisance. Again, build these into your contracted service standards for operators, with a clause that allows you to suspend the trial if they are not kept to.** Incorrectly parked e-scooters should be immediately removed by the operator and if not removed within a certain timescale (for example 1 hour of being abandoned) the local authority should have

a way of being notified and taking action. E-scooters on pavements constitute an obstruction and a hazard to pedestrians. Problems with parking of rental e-scooters have led to litigation from disabled people in the United States.

Public awareness

- **Consider how to raise local awareness of why driving e-scooters safely and following the Highway Code is so important**, including the potential impact of pavement riding and obstructions on disabled people's safety, confidence and independence. This could be included in your tender requirements for potential operators.
- **Preference should be given to operators who are able to deliver training and support to new drivers.** Evidence shows first time e-scooter drivers are more likely to get injured because they are unfamiliar with the vehicles. Compulsory in-app training and capping the speed that new e-scooter drivers can drive at to a lower speed than experienced drivers would help address this.
- **Preference should be given to operators whose staff have undergone effective disability awareness training which includes an understanding of sight loss.** This will ensure they have the correct knowledge to train new drivers properly.

Design

- **Maximum speed limits for e-scooters must be implemented and guaranteed**, with consideration given to limiting to appropriate speeds for different areas. We think the maximum speed limit should be 12.5mph in line with other European countries, with consideration given to lower speed limits for certain areas, such as around schools. E-scooters must be prohibited from shared use spaces.
- **Preference should be given to operators offering e-scooters that make more noise when being driven** to help make them audibly detectable to pedestrians with sight loss. Local authorities should monitor the effectiveness of this and feed back to the Department for Transport to help long term evaluation.
- **Preference should be given to operators offering e-scooters with bells which are easily accessible** to the driver without them having to move their hands from the handlebars.
- **Preference should be given to operators offering e-scooters fitted with double or stable and wide kickstands** to reduce the risk of them falling over and causing obstruction or injury.

- **Preference should be given to operators offering e-scooters which have clear large text identification numbers** used to help enforcement of rules, for example to allow identification of individuals driving e-scooters irresponsibly.
- **Preference should be given to operators offering e-scooters with bright fluorescent colours and distinctive designs** which would make them easier to detect for people with sight loss, and more easily distinguishable from privately-owned e-scooters for police.
- **Preference should be given to operators offering e-scooters with daytime running lights.** This may aid visibility for pedestrians with low vision.

Complaints process

Many complaints processes are inaccessible and overly complicated, meaning disabled people often do not submit complaints about incidents they have had. It has been difficult or impossible for blind and partially sighted people to read visually displayed dockless bike identification numbers to make complaints about them obstructing pavements, and it's important that this is addressed before rental e-scooter trials begin so that local authorities are able to get a full picture of the impact of trials on pedestrians.

- **Complaints processes must be accessible and easy to use.** Websites and apps must meet web accessibility standards (i.e. the international WCAG 2.1 AA accessibility standard) including compatibility with screen reader and Zoom Text technology. Helplines must also be available for people who don't have access to the internet.
- **Complaints processes must be widely publicised in a variety of formats in trial areas.** For example: notifying local disability groups, announcements on local radio and online forums, notifying local key workers such as community health workers.
- **Preference should be given to companies who are able to use technology like GPS tracking and bluetooth beacons** to marry up any complaints from pedestrians about incidents with e-scooters with who was riding them at the time, and have workable and proportionate plans for tackling behaviour that leads to complaints.

Ongoing monitoring

- **Build processes to collect the experiences and impact of e-scooters on other street users,** particularly disabled pedestrians, from the start of the trial period, and think about how they can be

used to refine the trial as it progresses. These processes must be impartial and accessible, carried out by the local authority.

- **Robust processes for monitoring pavement riding, riding in restricted areas, and poor parking must be written into tender and contract documents.**
- **Ensure a full consultation and Equality Impact Assessment is conducted by the local authority at the end of the 12 month trial period**, on the operation of the scheme. Local authorities must feed into any national consultation with responses that include the impact rental e-scooter trials have had on blind and partially sighted people.
- **RNIB have launched a tool to collect the experiences of blind and partially sighted people in rental e-scooter trial areas**, available at: <https://rnib.in/escootertrials> and will be sharing our findings with the Department for Transport. If you go ahead with the trial please publicise this tool and RNIB will share its findings with you.

For more information about this advice, please contact:

RNIB: campaigns@rnib.org.uk

Guide Dogs: publicaffairs@guidedogs.org.uk

London Vision: info@londonvision.org

Thomas Pocklington: info@sightlosscouncils@org.uk

For details of your local sight loss organisation:

- Visionary (membership organisation for local sight loss charities): visionary@visionary.org.uk
- Sight Loss Councils, supported by the Thomas Pocklington Trust, Online: <https://www.sightlosscouncils.org.uk/find-us>

Document ends.