Advice for e-scooter operators participating in rental e-scooter trials

We have produced this advice for e-scooter operators and manufacturers to help make e-scooter rental schemes more accessible. We have produced similar guidance for local authorities which we will provide on request.

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 using 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 outcome of the rental e-scooter trials in England, Scotland and Wales, and the prospects for the longer-term legalisation of e-scooters for rental and private use, depend on successfully resolving the conflict between e-scooters and disabled pedestrians. Companies must ensure their services do not discriminate, directly or indirectly, against disabled people.

Parking

Dockless vehicles obstruct walkways and present dangerous trip hazards to pedestrians, particularly those with sight loss. We have seen dockless bikes obstructing pavements in London having a huge impact on blind and partially sighted people and it is essential to avoid this with e-scooter rental hire schemes. 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 road car parking spaces should be repurposed for e-scooter parking. To minimize the impact on disabled pedestrians:

- **Rental e-scooters must always be parked in designated parking bays, where a detectable kerb (with a minimum height of 60mm) separates walkways from parked e-scooters.**
- **Create strong mechanisms to encourage and enforce compliance with parking rules using tools like bluetooth**

beacons or GPS tracking for monitoring individual driver behaviour.

- **Monitor adherence to parking requirements and plan how you will move any e-scooters not parked in a designated bay as quickly as possible** and within a certain timescale (for example 1 hour of being abandoned), to avoid pavement obstructions. If for any reason your staff are not able to move the obstruction, consider how you will report this to the local authority.

Where e-scooters can be ridden

Disabled and older people and children are at greater risk from accidents involving e-scooters so think about the measures you could put in place to minimize interactions between these groups and your customers.

- **Consider how technology like bluetooth beacons or geofencing could be used to monitor and/or prevent riding on the pavement, or restrict speed or access for e-scooters to particular areas** such as shared use spaces, around hospitals and schools, or areas with high numbers of disabled or elderly people.

Driver behaviour

There are opportunities within the hiring process to educate, train and support e-scooter drivers to drive safely and follow the Highway Code which you could use to encourage better understanding and positive driver behaviour. For example:

- **Ensure your staff have undergone effective disability awareness training which includes an understanding of sight loss**. This will ensure they have the correct knowledge to properly train new drivers. Contact our organisations to find out where sight loss awareness training can be accessed.
- **Train potential drivers before their first hire,** including on the impact poor driving and parking can have on disabled people, and particularly those with sight loss.
- **Consider capping the speed that new e-scooter drivers can drive at to a lower speed than available to experienced drivers**. For example, for the first five minutes of the first hire new drivers could be capped at a lower maximum speed than usual.
- **Use information from GPS tracking and/or bluetooth beacons to encourage good behaviours**. This could be delivered via real time alerts on the e-scooter itself for example when drivers are approaching restricted areas or slower speed areas, or it could be

retrospective via the app to offer a reminder about good driving and parking practice.

- **Implement mechanisms to ensure compliance with parking rules.** For example, requiring drivers to take photos of the properly parked e-scooter.

Design

- **Maximum speed limits for e-scooters should 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 cities, with consideration given to lower speed limits or restricting access to certain areas like shared space or near schools.
- **Monitor sound levels of e-scooters at different speeds and ensure your e-scooters are audibly detectable** while in use by pedestrians with sight loss.
- **Ensure e-scooter bells are easily accessible** to the driver without them having to move their hands from the handlebars.
- **Ensure e-scooters are fitted with double or stable and wide kickstands** to reduce the risk of them falling over and causing obstruction or injury.
- **Ensure e-scooters have clear large text identification numbers** used to help enforcement of rules, for example to allow identification of individuals driving e-scooters irresponsibly.
- **Bright fluorescent colours and distinctive designs of rental e-scooters** would make them easier to detect for people with sight loss, and more easily distinguishable from privately-owned e-scooters for police.
- **Consider fitting daytime running lights on e-scooters.** This may aid visibility for pedestrians with low vision.

Complaints processes

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 you can mitigate against any ongoing negative effects.

- **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.

- **Consider how technology like GPS tacking, and bluetooth beacons could be used** to marry up any complaints about incidents with e-scooters with who was riding them at the time, and have clear plans for what action will be taken against drivers who break the rules.

Ongoing monitoring

- **Record and save information about the nature and number of complaints received about e-scooters** to feed into both ongoing monitoring of e-scooter trials, and the public consultation at the end of the 12 month trial period.
- **Monitor and report to local authorities and the Department for Transport pavement riding, riding in restricted areas, and poor parking,** and use this information – along with complaints - to adjust speed limits, change restricted areas and adapt or increase parking throughout the trial period.
- **Please share RNIB's tool to collect the experiences of blind and partially sighted people** in rental e-scooter trial areas, available at https://rnib.in/escootertrials, we will be feeding our findings into the Department for Transport.

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.