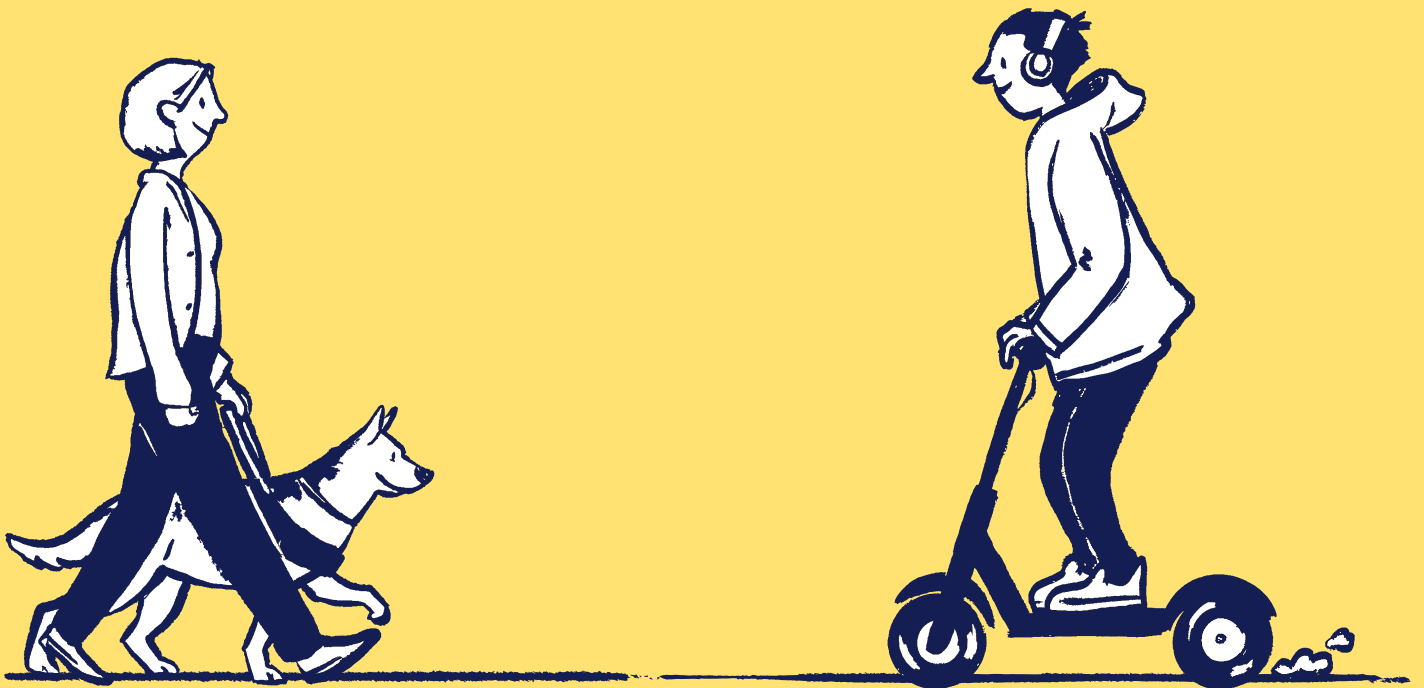




#ScootAware

Scoot Aware

The effect of e-scooters
on people with sight loss



Keep everyone safe. Be Scoot Aware

Summary

- The Government have stated that they intend to legislate to legalise e-scooters imminently, however Guide Dogs' research shows that fast, heavy and powerful e-scooters are being ridden antisocially and already having a significant and detrimental impact on the lives of people with sight loss. Three quarters of people with sight loss who have encountered an e-scooter have already reported having a negative experience.
- The Government's e-scooter trial rental schemes are a contributor to some of the disruption on the streets. There are measures that we believe the Government could take to address some of the issues directly caused by them.
- There is a lack of public understanding or adherence to the law around private e-scooters, which cannot be used legally on public land. There has been an explosion in the illegal use of these entirely unregulated private e-scooters.
- The Department for Transport needs to work urgently across government to challenge illegal use and control the sales of privately owned e-scooters.
- No decision should be made on the full legalisation of private e-scooter use without addressing the catalogue of serious problems that have emerged from their use.
- Guide Dogs' Scoot Aware campaign has worked to raise awareness of the key issues e-scooters pose for people who are blind or partially sighted, and make recommendations to inform the Government's future plans in this area. We have engaged with trial operators, police forces, local and national government, sector partners and the media on this issue to date.

We have assembled this report to set out the impact e-scooters are having on people with sight loss.

This report is divided into five sections:

Section 1. Why we are campaigning on e-scooters

Section 2. Experiences of people with sight loss and e-scooters

Section 3. Focus on the key challenges presented by e-scooters

Section 4. Guide Dogs' engagement with the trials

Section 5. Guide Dogs' recommendations



Section 1:

Why we are campaigning on e-scooters

Background

Visual impairment in the United Kingdom

There are two million people living in the UK with sight loss, with approximately 350,000 people registered as either severely sight impaired (blind) and sight impaired (partially sighted)¹. With an ageing population and increased incidences of conditions such as diabetic retinopathy, this number is expected to increase dramatically. By 2030 there will be an estimated 2.7 million people with sight loss in the UK, rising to 4 million by 2050.

2,000,000
people living in the UK with sight loss

350,000
people registered as either severely sight impaired and sight impaired

2,700,000
people with sight loss in the UK by 2030

4,000,000
people with sight loss in the UK by 2050

Use of e-scooters

Battery powered e-scooters and similar micromobility devices have been used on our streets for a number of years. However, as a result of technological advances making the devices cheaper and the establishment of e-scooter rental trials, there has been a significant increase in the number of e-scooters being used in the UK in the past two years. Current estimates suggest there are around 20,000 rental e-scooters. Over one million privately owned e-scooters have been purchased².

While it is illegal to use a privately-owned e-scooter on public land without the permission of the landowner, private e-scooter use has become widespread, and enforcement against their use is very limited in most areas.

E-scooters are often heavy, powerful, can reach high speeds and are relatively silent. These characteristics, combined with the fact they are often driven on pavements, means they have already had severe consequences for people with sight loss.

The rise of e-scooter use has taken place against a backdrop of encroachment on the pavement by ever-more obstructions and trends in street design that do not take accessibility into account. Clear, well-maintained pavements for the sole use of pedestrians and clearly separated from vehicles are essential in enabling people with sight-loss to travel safely. However, we know that conditions on our streets are far from ideal. Research from Guide Dogs has shown that 81% of people with sight loss said that reducing obstacles on pavements and street clutter was important to improving their quality of life.³

In April 2022, the Government stated they intend to legislate to legalise e-scooters in the next session of parliament. The Government has one chance to regulate e-scooters to make them safe for riders, pedestrians and other road users. This report sets out how the Government can do this.

Why campaign on e-scooters in particular?

As the largest sight-loss organisation and provider of mobility services in the UK, our mission is to help people who are blind or partially sighted live the lives they choose. Yet all too often people with sight loss who we work with – and are prepared with the skills and equipment they need – still face barriers when trying to walk the streets.

We actively campaign on many of these issues, from improving street design to tackling problem pavement parking. We are engaging with national and local government about e-scooters. We recognise that as wider legalisation of e-scooters hangs in the balance, we only have one chance to get this issue right for people with sight loss and wider society.

Who is impacted by the use of e-scooters?

While our report focusses on the impact e-scooters are having on the lives of people with sight loss, we are also aware that the impact is not limited to this group. There are numerous reports on the problems caused by anti-social e-scooter use, with reports of them causing difficulties for wheelchair users⁴, children⁵ and older people. Due to cases of e-scooter batteries catching fire, privately owned e-scooters are banned from Transport for London services.⁶



Rental e-scooters V privately owned e-scooters: why we are commenting on both

In this report we will address the impact of both rental and privately owned e-scooters for the following reasons:



The Department of Transport has recently indicated its plan for legislating on private e-scooters based on the trial schemes. This is a significant concern given the different controls on the design, use and enforcement schemes that relate to the different categories of e-scooters. We believe the results of the evaluation of e-scooter trials should only be used to decide the future of e-scooter rental schemes, and must not have wider application.



It is virtually impossible for most pedestrians – and especially people with sight loss – to make a distinction between rental e-scooters and private e-scooters when they encounter them. Some issues are more acute among rental vehicles (such as the problem of rental e-scooters being left to block pavements), whereas others issues (such as excessively high speeds) are primarily an issue with privately owned e-scooters. Where it is clear that the evidence we have gathered only relates to one type of device (i.e. a rental e-scooter rather than a privately owned e-scooter), we highlight this in our report accordingly.



The existence of the trials of rental e-scooters has undoubtedly had a direct link to the dramatic escalation in the ownership and use of private e-scooters, and confusion around the law on e-scooters generally. The continuation of the rental schemes would perpetuate this situation, so the impact of the rental schemes cannot simply be viewed in isolation.



Guide Dogs original research

Through the range of services we provide as the largest sight loss organisation in the UK, we have extensive contact with our clients and an understanding of their day to day experiences. During the pandemic, our staff and volunteers carried out tens of thousands of keeping in touch calls to ensure people had the information and support they needed. E-scooters have quickly become an issue raised with us. In order to strengthen our understanding of the issue, we carried out the extensive external research, working with a range of well-known agencies, which we draw upon in this report. The details of this research can be found in appendix one.



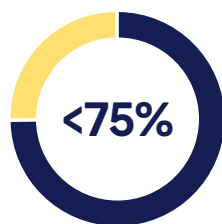
Section 2: Experiences of people with sight loss and e-scooters

Key concerns of people with sight loss

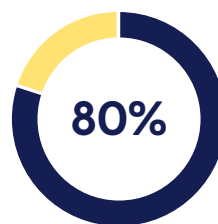
The clearest indication of the impact of e-scooters on the lives of people with sight loss comes from research carried out on behalf of Guide Dogs in January and February 2022⁷. The research consultancy Insight Angels conducted a detailed survey of a representative sample of 151 people with sight loss.

According to the research, **97% of people with sight loss were aware of e-scooters and 78% had encountered an e-scooter.**

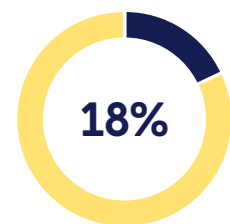
Of people who had encountered an e-scooter:



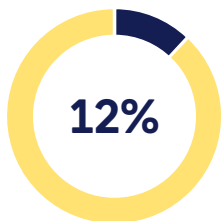
Nearly three quarters had already had a negative experience.



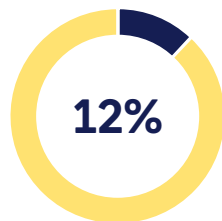
had an e-scooter rush past and frighten them.



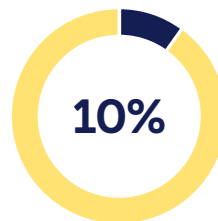
had been shouted at to get out of the way by an e-scooter rider.



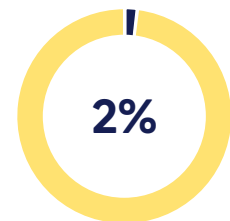
reported their guide dog had been disturbed by an e-scooter.



reported their mobility aid or cane had been hit by an e-scooter.



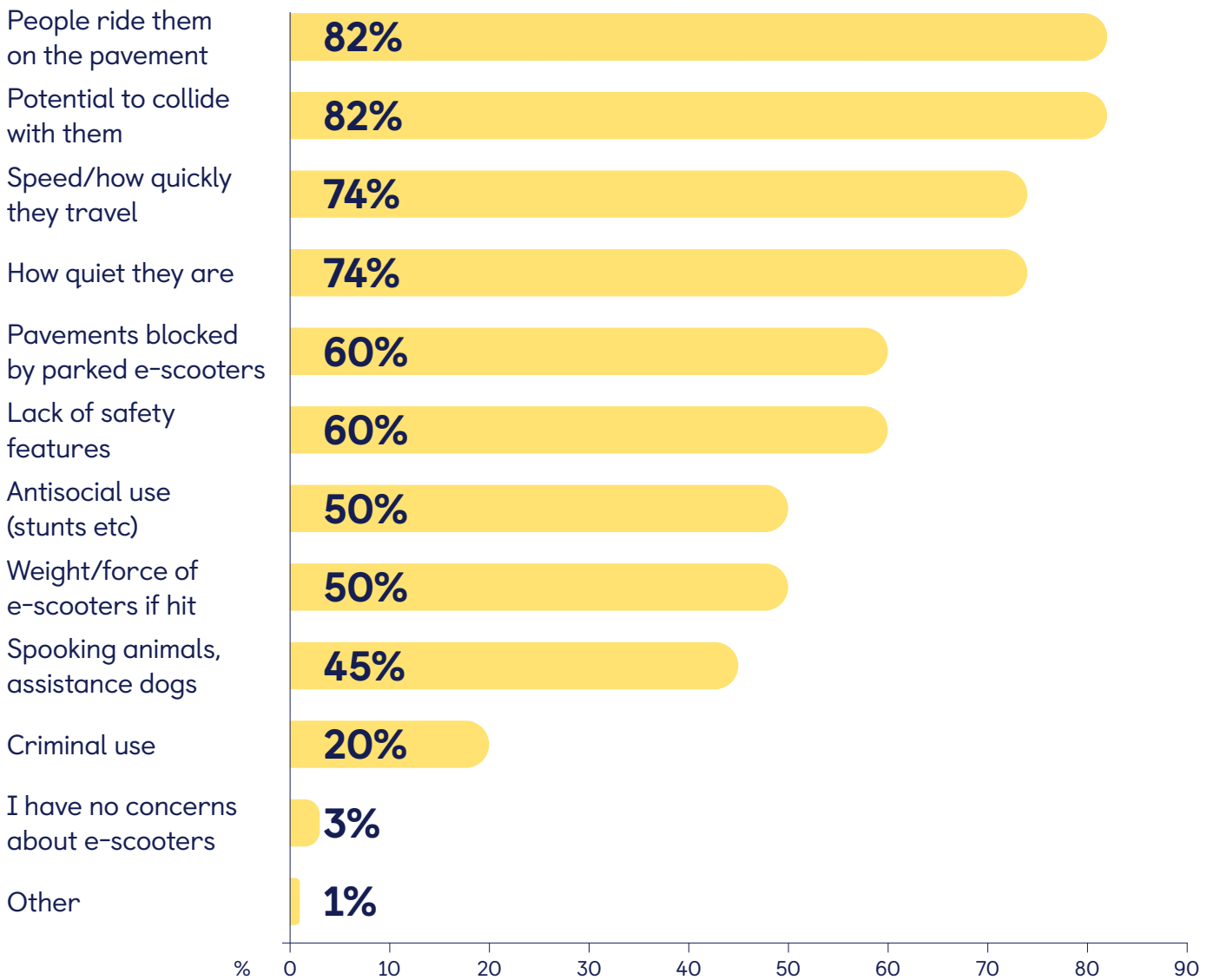
had been hit but not injured by an e-scooter.



had been hit and injured by an e-scooter.

E-scooters have only been found on our streets in substantial numbers for a limited period, at a time when our research shows us blind and partially sighted people were getting out of the house less than they did before the pandemic. This means the number of people who have already been involved in a collision is deeply worrying.

Key concerns about e-scooters

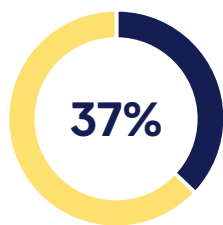


The key concerns about e-scooters reflect the problems they have already caused, with pavement riding and the associated potential for collision being the most widespread. These areas are explored in-depth in section 3 of this report.

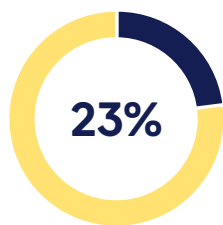


Impact on behaviour of people with sight loss

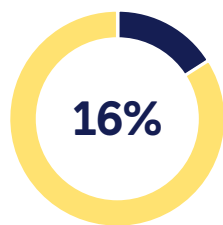
Over half of people with sight loss reported changing their behaviour due to e-scooters, according to research from Insight Angels.



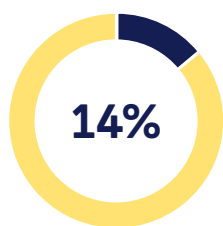
feel less safe.



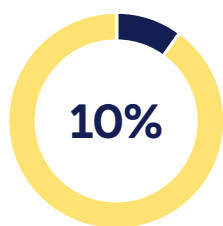
feel less independent.



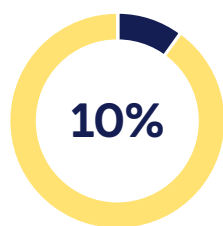
do not go to some parts of their town.



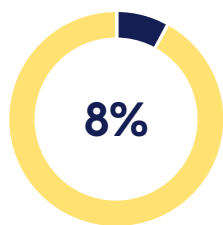
have changed their regular routes.



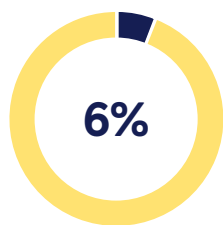
have shortened their trips outside to reduce their risk of encountering e-scooters.



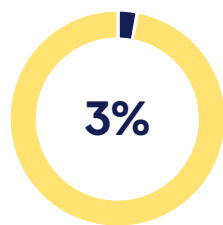
have used taxis or public transport instead of walking to avoid e-scooters.



have got a lift from family or friends instead of walking.



of respondents are leaving their home less because of e-scooters.



reported always travelling with someone sighted so they can warn of approaching e-scooters.

These results are deeply alarming given that e-scooter use is in its relative infancy and increasing at a considerable rate.

While the proportion of people with sight loss who have been involved in a collision with an e-scooter remains comparatively low, the marked change in behaviour of many people with sight loss in reaction to e-scooters demonstrates how the perception of risk has an inhibiting impact on peoples' quality of life. As with many barriers in the urban environment people with sight loss tell us they adapt their behaviour and self-exclude themselves from environments where there is a perceived risk.

“

I feel frightened and panic-stricken, I don't know what to do. Please, I could really do without these emotions.

”

Participant in Guide Dogs' focus group

“

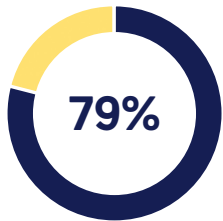
E-scooters and shared usage spaces are a disaster. My area has a trial of e-scooters and allows them in the city centre in "pedestrianised" areas. There is literally nowhere in the city centre that myself and my guide dog are not at risk of being hit by these heavy vehicles.

”

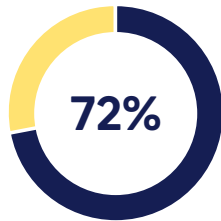
Person with sight loss who contributed to Insight Angels' research.

What do people with sight loss think should be done about e-scooters?

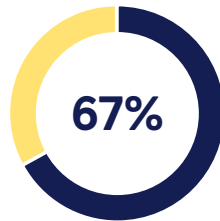
According to the research conducted on our behalf by Insight Angels, the overwhelming majority of people with sight loss support the introduction of mandatory safety features for all e-scooters.



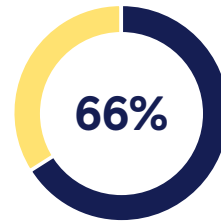
wanted safety features such as lights and bells to be mandatory.



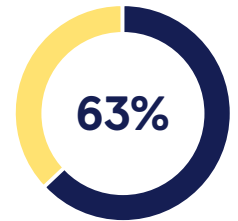
support the introduction of speed limiters to be attached to e-scooters.



are in favour of better education and training for e-scooter riders



would like e-scooters to emit a louder noise to make them more detectable.



supported greater police action on e-scooters or tighter laws to penalise riders.

On the broader topic of legalisation, while our research indicates that e-scooter use is already deeply problematic for many people, the majority of people with sight loss surveyed are not calling for an outright ban of e-scooters.

Only 22% of respondents stated they would like an outright ban on all e-scooters, including rental e-scooters. 23% said they would support the use of rental e-scooters alone and prohibit private e-scooters from being used. 36% of respondents agreed with allowing e-scooters to be used in approved areas only.





Section 3: Focus on the key challenges with e-scooters

In this section we explore in turn the key challenges posed by e-scooters as reported by people with sight loss. In each area we indicate whether these issues relate to just the trial e-scooter rental schemes, private e-scooters or both.

Pavement riding and collisions

“

It's very scary to think I am now sharing the footpath with a motorised vehicle, when it should be a safe space for me. The increase in the number of e-scooters in my area has made me more nervous and I'm now more cautious and don't want to go out on my own with my long cane in case something bad happens.

”

Guide dog owner Sue

Rental or private e-scooters?

The problem of pavement riding is an issue for both private and rental e-scooters.

The principal concerns were around pavement ridership and the potential for a collision (both at 82% of respondents).

The high level of concern about pavement use from people with sight loss reflects the concerns of the wider public, who report high levels of pavement riding.

YouGov polling commissioned by Guide Dogs in August 2021 found 66% of people questioned had seen an e-scooter driven on the pavement in the past six months. Of people who had encountered e-scooters at all, the percentage who had seen them driven on pavements rose to 92%.

Pavement driving:

While some rental e-scooters feature geo-fencing technology that is designed to limit their use and speed in certain areas, this technology appears to be limited in its efficacy, with consistent reports of e-scooters being driven outside of areas where they are meant to be used, such as rental e-scooters being taken on to motorways⁸.



Weight, power and speed of e-scooters

Rental or private e-scooters?

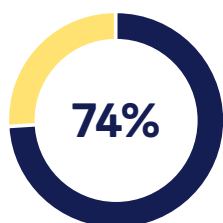
Concerns about weight, power and speed apply to both the rental schemes and privately owned e-scooters.

“

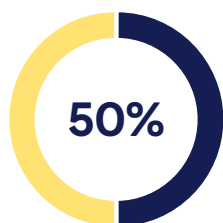
The speed is ridiculous, these things are being used to get around quickly and it's really, really frightening.

”

Participants in Guide Dogs' discussion group



of respondents were concerned at the speed of e-scooters



concerned about the weight and power of e-scooters

Linked to fears about collisions, 74% of respondents were concerned at the speed of e-scooters and 50% reported concern about the weight and power of e-scooters in the Insight Angels research for Guide Dogs in 2022.

The maximum speed of trial e-scooters is 15.5mph, the same limit as e-bikes, but higher than the maximum speed for e-scooters set in other major European countries.

Many private e-scooters exceed these speed limits considerably. E-scooters that can reach speeds of 35 to 50mph are readily available in shops and online, and it is possible to purchase e-scooters that reach speeds of up to 68mph⁹.

Polling conducted on behalf of Guide Dogs has demonstrated that not only do e-scooters have the ability to travel more quickly, but we know that they are routinely ridden at these higher speeds. According to a survey by One Poll conducted for Guide Dogs, the average speed private e-scooter riders admit to driving at is over 16 mph. Nearly a third (31%) admitted to driving at speeds higher than 21mph.

The power and weight permitted on the trial rental e-scooter schemes is also significantly higher than bicycles or e-bikes, which increases the risk to pedestrians, particularly people with sight loss. The maximum power, which affects acceleration, is double that of e-bikes, and the maximum weight of 55kg is almost three times the average weight of a standard e-bike. The combined effect of higher speed, power and weight means that these vehicles are significantly more dangerous in a collision. Evidence to the Transport Committee's inquiry on e-scooters from manufacturers' bodies highlighted that the 500W power limit would give e-scooters "formidable acceleration", and the power limits are much higher than those of e-bikes¹⁰.

We were disappointed that the Department for Transport raised the proposed caps on weight, power and speed to a higher level than those initially proposed. We recommend that the limits on weight, power and speed be reviewed for both rental and private e-scooters, in light of the Government's plans to legalise e-scooters.

As private e-scooters are currently unregulated, there are no restrictions on their power and weight. At the time of writing, it is possible to buy e-scooters with several thousand Watt Motors - over 6000W in some cases. This is more powerful than many electric mopeds. The Government must introduce restrictions on the sale of these e-scooters.

Guide Dogs' crash testing research

Guide Dogs was concerned at the seeming absence of plans to commission research on the safety of a mode of transport that is being considered for wider legalisation. As a result, we commissioned information on the safety of e-scooters from UTAC, a leading crash test provider, to undertake an independent study on the impact of e-scooters.

UTAC simulated a crash involving an e-scooter and its driver, colliding with a pedestrian at 15.5 mph. This showed the initial impact could cause moderate injury such as lacerations or major bruising. If the pedestrian hit their head on the floor as a result of the collision, the injuries sustained were highly likely to be fatal.

In addition, UTAC simulated an accident involving a pedestrian the same size and weight as a three-year-old child. Upon impact, the child travelled more than 21 feet (more than 6 times it's body length) as a result of the impact.

Silence

Rental or private e-scooters?

Concerns about the lack of sound on e-scooters apply to both the rental schemes and privately owned e-scooters.

Many people with a vision impairment are reliant on auditory information to understand the environment around them, and to make important decisions such as when to cross the road. The almost silent nature of e-scooters presents a particular challenge and 74% of people with sight loss surveyed by Insight Angels for Guide Dogs in 2022 were concerned at how silent e-scooters are. The level of concern increased to 81% of the sample with a severe visual impairment.

“

My guide dog Inca and I were once hit by a rider. I could hear two voices getting closer and the next thing I knew I was hit with such a force that I was knocked over and into Inca.

It was extremely unsettling as I had no idea what had hit me. Only afterwards was I told by a passing pedestrian that it was an e-scooter.

One of the biggest problems is that it's difficult for me to know where e-scooters are as they operate quietly, so I was not able to hear it coming towards me. I only knew something was approaching me because the two boys were screaming.

”

Guide dog owner Elaine

Elaine's guide dog was subsequently unable to work for three weeks due to bruising and muscle damage as a result of the collision.

Artificial sound generators

Guide Dogs successfully campaigned for a requirement for Acoustic Vehicle Alert Systems (AVAS) on quiet hybrid and electric vehicles, and we would strongly recommend the Department for Transport thoroughly research the possibility of equivalent systems as part of their plans to legalise e-scooters.

We are aware that multiple e-scooter rental trial operators are exploring the feasibility of integrating AVAS into their models. These efforts are welcome, but any system needs to be thoroughly and expertly tested, and needs the support of national government to ensure that the standards are uniform and enforced. Varying AVAS systems could lead to greater confusion, and if there is no requirement for them to be installed and maintained then their benefit will be limited. At the moment, efforts to investigate AVAS systems seem to be limited to rental e-scooters, we believe any introduction must also include private e-scooters.

While AVAS may prove beneficial to people with sight loss, it will not fundamentally alter the key challenges that e-scooters possess in terms of their speed, power and the prevalence of pavement use.

The general public appears to strongly favour the installation of artificial sound generators. According to our August 2021 polling conducted by YouGov, 75% of people who had encountered an e-scooter in the previous six months supported a requirement for e-scooters to emit a continuous sound to help make their presence known. Only 7% opposed.



Blocking pavements

“

In the summer, it was too hot to take my guide dog out and I had to pick up an urgent prescription from the chemist. I walked down with my white cane, picked up the prescription and did exactly the same route on the way home. I have very little sight and I felt through the cane that there was something on the floor. I guided the cane around and realised it felt like the handle of a scooter. I manoeuvred around that, but then I tripped up and landed very heavily on my right foot. I ended up with a hairline fracture. A pedestrian told me there were two e-scooters on top of each other that had been dumped in the middle of the red way [a type of path in the area].

”

Guide dog owner who participated in a Guide Dogs' discussion group.

Rental or private e-scooters?

Concerns about blocking of pavements primarily relate to rental e-scooters that are part of the trial.

Blocked pavements are one of the key concerns for people with sight loss; in 2021 our research found 81% of people with sight loss said that reducing obstacles on pavements and street clutter was important to improving their quality of life. In terms of priorities, this was one of the highest ranked quality of life issues, alongside an ability to maintain a decent income.

People with sight loss rely on clear and well-maintained pavements in order to travel safely and independently. An obstruction on the pavement can force people with sight loss into the road, potentially into oncoming traffic which they cannot see.

Vehicles parked on the pavement pose an additional problem because their presence is random and inconsistent. People with sight loss may be able to take into account permanently inaccessible features of streetscapes such as very narrow pavements on historic streets, and plan alternative routes. This is not possible when vehicles are unpredictably left on public footpaths.

The weight of e-scooters means they are also difficult and potentially dangerous for other pedestrians to move. A 75 year old man died in Northampton following injuries sustained when trying to move a rental e-scooter out of the way of his mobility scooter¹¹.

Rental e-scooters operate with either marked parking areas or can be 'dockless', and users do not need to leave them in designated spots.

Dockless schemes are especially problematic, and have resulted in e-scooters being left in the middle of pavements. These are particularly unsafe for pedestrians, especially people with sight loss.

While some rental operators have tried to limit anti-social behaviour through placing restrictions on where e-scooters can be parked through geofencing technology and requiring photos to be submitted of parked vehicles, this problem has persisted.

Additionally, in some instances the operators themselves have been responsible for causing serious obstructions by leaving e-scooters blocking the pavement. In a notable case in Bristol over 100 e-scooters were reported in the local media to be blocking a street¹².

Docked schemes are preferable, but they must be clearly delineated with a detectable kerb of at least 60mm, and not occupy space that would otherwise be for pedestrians.

Other safety issues with e-scooters

Rental or private e-scooters?

Concerns about blocking of pavements primarily relate to rental e-scooters that are part of the trial.

Beyond the weight, power, speed and sound of e-scooters, other issues have been identified in relation to their design and use that are a cause of concern for people with sight loss.

In their initial position statement on e-scooter trials, Parliamentary Advisory Committee on Transport Safety (PACTS), clearly set some of key issues with the design e-scooters¹³.

In particular:

- E-scooters are less stable than other road vehicles on account of their smaller wheels. The small wheel size renders them less capable of tackling potholes and uneven surfaces.
- The standing position of the rider contributes to the instability of e-scooters.
- Crucially, for people with a vision impairment e-scooters are often less visible because where lights are fitted, they are invariably low to the floor and harder to detect – especially at the rear of e-scooters.



We recognise that e-scooters being used as part of the trials are required to undergo some safety testing. However, some of the issues with their comparative lack of stability compared to other vehicle types are inherent in their design.

Impact on working guide dogs

In recent months, guide dog trainers have been increasingly encountering problems with trainee and working guide dogs who are fearful of e-scooters after having negative experiences. We are looking at ways of adapting our training to mitigate this, but the unpredictability and frequent dangerous driving of e-scooters make this challenging.





Section 4: Guide Dogs' engagement with the trials

From the outset, Guide Dogs has sought to work with central government, the police, local authorities and with e-scooter operators in encouraging responsible rider behaviour in e-scooter trial areas, and tackling illegal and anti-social use in the case of privately owned e-scooters.

Working locally with trial operators and local authorities

From the outset of the trials, Guide Dogs collaborated with other sight loss organisations to produce guidance for e-scooter operators and local authorities on best practice for people with sight loss.

Guide Dogs staff and volunteers across England have engaged with the e-scooter trials since July 2020. We have experienced varied levels of activity in different trial areas. Some trial areas, such as the West of England Combined Authority, Taunton, Essex, the West Midlands and Gloucestershire, have established regular stakeholder groups. These groups have given us the opportunity to provide feedback on the experiences of local people with sight loss. Working with other sight loss organisations, we have also arranged awareness events for e-scooter operators, councillors and council officers in some of these areas. Restrictions due to the pandemic limited some of this activity.

In other trial areas engagement has been sporadic. We are disappointed that there has not been a consistent approach taken in many trial areas to engage with stakeholders on a regular basis.

Operators have responded to the substance of our asks with varying degrees of positivity. For example, some operators were receptive to our position that parking bays are required, whereas others dismissed this out of hand.

The level of evaluation data shared by operators has also varied, making engagement inconsistent and making it difficult to evaluate the impact of the trials. For example, data released by one trial operator might be withheld on grounds of commercial sensitivity. Data on the levels of enforcement and anti-social behaviour are inconsistent between different trial areas.

In the event that rental schemes are permitted on a permanent basis, there should be a clear requirement for the operators to meaningfully engage with local communities and share data on their performance.



Challenges with enforcement

While private e-scooter use on public land remains against the law, and rental e-scooter riders are prohibited from pavement riding, the law only has meaning if it is understood and enforced. Our experience and research shows that there is limited understanding of the law or it is ignored. There is no joined-up or uniform approach to enforcement.

Based on our current experience, we are not confident that any wider legalisation of e-scooters would be accompanied by a public information campaign or a willingness by government to lead on a coordinated approach to enforcement.

For legislation and regulations to be meaningful, they must be enforced in a uniform approach across the country.

When people with sight loss have tried to engage with authorities to tackle problematic use, they have often encountered difficulties:

“

After some investigations I contacted the local council and they informed me that if the scooters are left to the side or on a grass verge then the signal isn't sent from the GPS to go and collect them, they have to be left on concrete or pavement to collect them. The council told me they can try to trace the rider from the card details and try to speak to them but it's not working out well due to volume, it's an entire job in itself just to track somebody down to prosecute or give penalties.

”

Participant in Guide Dogs' discussion group.

Understanding of the law is low

Our August 2021 polling by YouGov of the general public found that only 32% were able to identify the law as it stands when presented with a list of options.

In November 2021, we commissioned OnePoll research to understand the views of e-scooter riders in particular. The survey found that 71% of those who drive privately owned e-scooters do so despite knowing it is illegal. These riders state they do so because the police have other things to worry about (51%) and they don't think they will be punished (45%).



32%

were able to identify the law



71%

know it is illegal



45%

don't think they will be punished

Data on accidents and enforcement is weak

Freedom of Information requests made by Guide Dogs to police services in October 2020 found only a minority were targeting unsafe e-scooter driving. A key challenge in understanding the number of incidents is the lack of available data.

The Government publish e-scooter accident statistics at regular intervals,¹⁴ however, as they state “E-scooters” are not one of the designated vehicle types collected in a STATS19 reportable accident”, and this means any recorded incidents of e-scooters are not easily and readily collected. In addition, private use remains illegal so there is likely to be a considerable degree of under-reporting about accidents involving e-scooters as people may not wish to report doing something against the law. These reasons combined mean the statistics on accidents and enforcement are unlikely to be definitive, and not a reasonable basis to make a decision on wider legalisation.

The Secretary of State has indicated that the Government will amend regulations to include e-scooters as a vehicle type so that incidents can be reported. Guide Dogs regrets that it has taken so long for this to happen, given how popular e-scooters have been over the last few years.

Beyond data collection, we have also been disappointed that the Government have consistently declined to provide guidance¹⁵ to police forces on e-scooters. We recognise the police forces are operationally independent of government and will need to decide their own priorities. However, it does not seem reasonable to introduce a new form of transport without providing guidance and support that individual police forces can draw on according to their operational needs.





Section 5: Guide Dogs' recommendations

Our research presents a worrying picture, where e-scooters are already having a detrimental impact on the quality of life for many people with sight loss, and posing a clear safety risk in many cases.

We hope the Department for Transport will take this evidence into consideration.

On rental e-scooters, we advise:

1. The Government should commit to reviewing the technical standards of e-scooters, in particular the power, weight and speed at which rental e-scooters are permitted. We recommend the Government consider the recommendations of PACTS' March 2022 report 'The safety of private e-scooters in the UK¹⁶'.
2. If rental e-scooter schemes are to be continued, they should all be docked and not obstruct the pavement.
3. The Government should produce rigorous standards for engagement that e-scooter operators and local authorities must meet, including carrying out and publishing detailed Equality Impact Assessments on any proposals.
4. The Government needs to clarify where any changes to the law will apply in Great Britain. The trials have only taken place in England, however as vehicle standard legislation is reserved to Westminster, we understand any change in the law on e-scooters would also apply in Scotland and Wales. Vehicle standard legislation in Northern Ireland is devolved. The patchwork of laws further adds to the confusion about the legality of their use.

On e-scooters more broadly, we advise:

5. The Government should make a clear pledge that they will not proceed with the legalisation of privately owned e-scooters based on the evidence of the trials alone.
6. The Government should prohibit the sale of unregulated and untested e-scooters.
7. The Government should take a leading approach with police forces and local authorities to ensure there is a joined up and consistent approach to enforcement.
8. Regardless of the outcome of the trials, the Government should take a leading role in ensuring the public understand the law on e-scooter use, and in particular the negative impact anti-social use has on pedestrians, and people with sight loss in particular.

About Guide Dogs

Guide Dogs is here to help the two million people living with sight loss in the UK live the life they choose. Our expert staff, volunteers and life-changing dogs are here to help people affected by sight loss live actively, independently and well.

For further information please contact publicaffairs@guidedogs.org.uk

Appendix One

Guide Dogs' research on the impact of e-scooters

We have carried out the following pieces of research that we reference in this report:

1. Freedom of Information requests with police forces: We submitted Freedom of Information requests (FOIs) to police forces across the UK to understand their experiences of e-scooter use, asking about levels of enforcement and confiscation. The first FOI was carried out in December 2020, and the second in January 2022. The results for the second FOI are not complete at the time of writing.
2. YouGov surveys of the general population: In order to understand the experiences of the wider public, we commissioned YouGov polls at the end of 2020, April 2021 and August 2021. The questions focused on how frequently people encountered e-scooters, where they were being used, and the public's understanding of the law on e-scooters.
3. A deep-dive on e-scooters carried out by the research consultancy Insight Angels: The research consultancy Insight Angels carried out in-depth research on Guide Dogs' behalf in January and February 2022 to gain a deeper insight into people with sight loss experiences of e-scooters. A broad and largely representative sample of 151 people with sight loss took part in the research, which found a considerable amount of negative first-hand experience of e-scooters on our streets.
4. A OnePoll survey segmented by people with a vision impairment: In November 2021 we commissioned OnePoll to understand peoples' experiences of e-scooters, with figures broken down by whether they had a vision impairment or not. We also directly asked e-scooter riders about their behaviour and understanding of the law.
5. Crash testing with UTAC: We worked with leading crash test provider UTAC to undertake an independent study on the impact of e-scooters. The testing explored the impact of collisions on riders and an adult pedestrian, and included some indicative research on the potential impact of a collision on a young child.
6. Discussion groups with service users: Parallel to the collection of data over the course of the past two years, we have also carried out discussion groups with people with sight loss, and accumulated case studies of their personal experiences to understand if and how e-scooter use affects their day to day lives. We have used quotes from these discussion groups in this report to highlight key issues.

References

1. RNIB, Key information and statistics on sight loss in the UK, retrieved March 2022. [\[Back\]](#)
2. The Sunday Times, 'One million e-scooters on the roads: how riders are breaking the law at breakneck speed', 12 February 2022. [\[Back\]](#)
3. Insight Angels and Guide Dogs, 'The Future of Mobility in the Built Environment Survey' (2021). [\[Back\]](#)
4. MK Citizen, 'Wheelchair user urges riders to stop leaving e-scooters on footpaths all over Milton Keynes', July 2021. [\[Back\]](#)
5. BBC News, 'E-scooters: Police contact schools after children in near-miss', December. 2021 [\[Back\]](#)
6. Transport for London, 'TfL announces safety ban of e-scooters on transport network', December 2021. [\[Back\]](#)
7. Insight Angels and Guide Dogs, 'E-scooters and other mobility barriers' (2022). [\[Back\]](#)
8. ITV News West Country, 'Two people caught on dashcam riding one Voi e-scooter on the M32 in Bristol', September 2021. [\[Back\]](#)
9. Dualtron UK, Dualtron X II Electric Scooter, retrieved March 2022. The Dualtron XII is reported has having 8300W dual motors a 72V 3024Wh battery), a range of 93 miles, weights 66kg and has a maximum speed of 68mph. [\[Back\]](#)
10. House of Commons Transport Select Committee, 'E-scooters: pavement nuisance or transport innovation?', October 2020. [\[Back\]](#)
11. Northampton Chronicle and Echo, 'Voi responds to scathing criticism from anti-scooter campaigner who STILL wants trials "shut down immediately"', April 2021. [\[Back\]](#)
12. Bristol Post, 'More than 100 e-scooters parked in one Bristol street', April 2021. [\[Back\]](#)
13. Parliamentary Advisory Council for Transport Safety (PACTS), 'PACTS' position on the trials and legalisation of e-scooters in the UK', June 2020. [\[Back\]](#)
14. Department for Transport, Reported road casualties Great Britain: e-Scooter factsheet year ending June 2021, Published November 2021. [\[Back\]](#)
15. Written answer UIN 98933, Electric Scooters: Hire Services, January 2022. [\[Back\]](#)
16. Parliamentary Advisory Council for Transport Safety (PACTS), 'The safety of private e-scooters in the UK', March 2022. [\[Back\]](#)