

Equality Impact Assessment (EQIA)

The Equality Impact Assessment (EQIA) form is a template for analysing a policy or proposed decision for its potential effects on individuals with protected characteristics covered by the Equality Act 2010.

The council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

1. Responsibility for the Equality Impact Assessment

Name of proposal: Scheme	Haringey Dockless Bike Hire
Service Area:	Planning, Building Standards & Sustainability
Officer Completing Assessment:	Dorota Dys
Equalities Advisor:	Joe Wills/Jim Pomeroy
Cabinet meeting date (if applicable):	19 September 2023
Assistant Director	Rob Krzyszowski

2. Executive summary

As part of the Council's Streets for People initiative, which has already delivered three trial Low Traffic Neighbourhoods, School Streets, and borough-wide improvements to walking and cycling infrastructure, Haringey is embarking on an ambitious programme to increase rates of active travel in the borough. At the heart of this is reducing short journeys by motor vehicles, improving air quality, responding to the climate



emergency, addressing health inequalities and making the borough a healthier place to live, work and rest.

The path to achieve increased active travel in Haringey is set out in the Council's adopted Walking and Cycling Action Plan (2022). which sets out an ambitious programme to enable more walking and cycling in the borough, in line with the Council's adopted 2018 Transport Strategy, and to fulfil Haringey's ambitions to have a reputation for being a walking and cycling borough both regionally and nationally.

A key part of the programme is the launch of a trial dockless bike hire scheme in Haringey. Linked to this, the procurement of a pilot dockless bike operator in 2023 is an explicit target within the Council's Corporate Delivery Plan 22/23 and 23/24

The CoMoUK Annual Bike Share Report 2022¹ found in a national survey of bike share users that bike share:

- motivates people to pick up cycling with 53% of bike share users starting cycling again after at least one year of not cycling and that 7% used bike share to cycle for the first time ever;
- incentivises more frequent cycling with 66% of users cycling more frequently since joining a bike share scheme;
- reduces car use with 37% of bike share users surveyed saying that had bike share not been available they would have made their most common bike share trip by car (as driver, passenger, or by taxi or hire vehicle);
- reduces carbon emissions with an estimated 71kg of carbon dioxide emissions savings per bike user each year as a result of their mode shift;

The planned dockless bike scheme is expected to result in an uplift in cycling levels within Haringey. This uplift will deliver a range of positive environmental, economic and social effects including but not limited to:

- improved health and wellbeing from improved access to cycling and increased levels of physical activity
- e-bikes making cycling accessible to more individuals and groups when compared with ordinary pedal bikes
- providing a cost efficient way of travelling which does require an expensive one-off purchase of a bike or e-bike
- reduction in carbon emissions as a result of reduced car miles
- improved air quality as a result of reduced car miles

At the same time however it is noted that benefits are not distributed evenly across the population and that dockless bikes also have potential to have negative impacts on certain individuals and groups, particularly older groups and disabled groups. It is important to note though that the appropriate comparison in this instance is the

¹ https://uploads-

ssl.webflow.com/6102564995f71c83fba14d54/644679f0f1a12cebdfca2390_CoMoUK%20Annual%20 bike%20share%20report%20UK%202022.pdf



delivery of a managed dockless bike trial in Haringey versus the current situation where at least one dockless bike operator is already operating within the borough without a formal arrangement in place with the Council (rather than the comparison of having dockless bikes in Haringey versus not having dockless bikes in Haringey).

Due to the current absence of legislation or regulation, operators are able to operate freely without the need to enter any legal agreement with the Council. Data from one dockless bike operator has indicated that Haringey users are taking over 20,000 trips per month.² Neighbouring boroughs have already established their own dockless schemes, with bikes from those schemes regularly being ridden into the borough and re-used in the borough before they are removed, with a range of issues arising from the limited management and oversight that the Council currently has. Therefore, in light of the substantial latent user-base, and the desire to effectively monitor and manage the operation of dockless bikes, it is considered beneficial to reach agreement with operators to provide a formalised dockless bike scheme. The Borough is looking to appoint one or two service providers and enter legal agreement with them giving the Council control over the scheme. This is proposed to be done on a trial basis for a up to 24 months.

The Council has engaged extensively with local residents and other key stakeholders in the winter and spring 2023 to develop the scheme principles. To ensure the scheme is suitably designed it is essential to consider the potential challenges of the proposals for those with protected characteristics.

The primary benefits of the scheme are likely to accrue to those groups who are most likely to use the bikes. The CoMoUK Annual Bike Share Report 2022 indicates based on a national survey of bike share users that:

- males are much more likely to use bike share than females
- bike sharing is used across all age groups but more so by younger people
- bike share schemes are attracting a relatively diverse group of users compared to Britain's general population
- bike sharing, like e-scooter trials, can provide improved access to mobility for socioeconomically disadvantaged communities.

The above data refers to bike sharing generally and not just to e-bikes. Haringey's proposed dockless trial will comprise exclusively of e-bikes and for this reason it is important to consider the potential benefits of improving access to e-bikes specifically. Electric-assisted bikes provide a potential additional mode of transport for people and groups for whom pedal bikes may not be a viable travel option (at all or for some longer trips or trips involving hills) and the availability of dockless e-bikes could help support them to active travel. As such e-bikes have potential to positively affect some individuals with restricted mobility which could include people with disabilities, older people and pregnant people. The CoMoUK Annual Bike Share Report 2022 shows

² Data from Lime bikes.

³ Group focused on representing under-represented and vulnerable residents as well as their needs in the borough.



that 22% of bike share users surveyed use e-bikes to overcome health difficulties or fitness levels and 77% of those surveyed said it makes their trips easier.

However, at the same time it is these people and groups (particularly older and disabled groups) who are most likely to be negatively affected by dockless bikes, whether through irresponsible riding by users or through obstructive parking. It is important to note too the intersectionality between disability and other characteristics with a range of racial groups more likely to be disabled compared with the average population. These groups are also more likely to experience socio-economic deprivation and therefore dockless bikes have potential to disadvantage these residents.

The baseline at present is that dockless operators are operating in the borough without a formal arrangement in place with the Council. The delivery of a managed trial will provide an important opportunity to minimise negative impacts on these groups. To do this, the Council will work with the appointed operators to develop as many suitable parking locations as possible and to ensure that users of dockless bikes are encouraged and incentivised to ride and park as safely as possible having regard to the risks to individuals and groups. The operators will be contractually bound to remove obstructing bikes within one hour of reporting and repeat non-compliance will result in the user's ban from the scheme whilst failure to remove obstructing bikes by the operator can result in the early contract termination.

User and non-users' safety is another important matter that will need to be closely monitored. Certain groups can be particularly vulnerable as they can suffer greater injuries resulting from a collision with a bike (e.g., older people, pregnant women). The operators are required to offer mandatory training to their users ahead of sign up to their scheme and should offer a range of awareness training events to non-users. Use of helmets and hi-vis clothing, although not legally required, will be incentivised.

Due to the cost of rental, certain groups on lower income could be excluded from the scheme especially if no flexible pricing is offered. Those lower income groups tend to be transport excluded regardless therefore Haringey will require operators to consider this and maximise inclusion and social value in their operations through, for example, the offering of discounts in areas of the borough subject to higher levels of deprivation.

Dockless bikes will be rolled out on trial basis for a period of up to 24 months. Operators will be required to carry out comprehensive monitoring and to report this to the Council. This will enable the trial scheme to be reviewed and refined over its lifetime. Final monitoring report will be prepared at the end of the trail period and will inform the decision about the future of the proposals.

3. Consultation and engagement

Haringey undertook a four-week engagement on the future dockless trial from Monday 23 January 2023 to Sunday 19 February 2023. In total nearly 2,500 individuals visited the Commonplace site, with 651 individuals participating.



Further discussions were held with LBH Councillors, Adult Social Care Joint Partnership Board³, Alexandra Park and Palace Charitable Trust, Lee Valley Regional Park Authority. Haringey is also continuously involved in a London-wide Micro-mobility Working Group⁴.

The results of the engagement demonstrated that there is general support for the proposals. Nonetheless, dockless bikes being abandoned in unsuitable locations was identified as a potential main issue arising from dockless bikes being introduced in the borough. A lack of cycle lanes and issues relating to safety were also seen as obstacles to implementation.

4. Data and Impact Analysis

Data Sources

This assessment is based on the data from the following sources:

- Haringey State of the Borough, April 2023⁵;
- Office for National Statistics, Census 2021 (data released at the time of writing)⁶
- Transport for London, Streetspace funding and guidance, Case-making data for Boroughs⁷;
- Travel in London, Report 15, Transport for London 20228;
- LG Inform (data available at the time of writing)⁹
- City of London Corporation E-scooter EQIA¹⁰.
- CoMo UK Annual Bike Share Report UK 2022¹¹

4a. Age

Data Borough Profile¹²

54,424: 0-17 (21%)

⁸ https://content.tfl.gov.uk/travel-in-london-report-15.pdf

³ Group focused on representing under-represented and vulnerable residents as well as their needs in the borough.

⁴ Meeting between TFL, London Councils and participating London boroughs (for e-scooters and dockless bikes schemes).

⁵ https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.p df

⁶ https://census.gov.uk/

⁷ https://tfl.gov.uk/info-for/boroughs-and-communities/streetspace-funding

⁹ https://lginform.local.gov.uk/

¹⁰ https://www.cityoflondon.gov.uk/assets/Services-Environment/city-of-london-corporation-panlondon-escooter-trial-eqia.pdf whilst this document refers to e-scooters, there are certain similarities between e-scooters and dockless bikes that can be applied in this assessment. ¹¹ https://uploads-

ssl.webflow.com/6102564995f71c83fba14d54/644679f0f1a12cebdfca2390_CoMoUK%20Annual%20 bike%20share%20report%20UK%202022.pdf

¹² Source: State of the Borough



71,657: 18-34 (27%) 63,929: 35-49 (25%) 46,514: 50-64 (17%) 27,712: 65+ (11%)

Census 2021

Table 1: Method of travel to work by age

	Aged 15 years and under	Aged 16 to 24 years	Aged 25 to 34 years	Aged 35 to 49 years	Aged 50 to 64 years	Aged 65 years and over	Grand Total
Bicycle	0%	1%	4%	3%	2%	0%	2%

Findings of the data:

- a) According to the above data, residents under the age of 18 and those 65 years old and over are almost a third of Haringey population.
- b) In terms of the use of traditional bikes the data indicates that cycling accounts for 3% of all commuter trips¹³ amongst those aged 16-64 and it drops to just 1% for those over 65 years old.
- c) According to the TFL data¹⁴, cycling accounts for 1% of education trips in the age group from 5 to 10 and 2% of education trips in the age group from 11 to 17 in Haringey borough.
- d) Only a small proportion of trips taken by older and younger groups are therefore undertaken by bike, which indicates that broader measures should be put in place to encourage these groups to cycle.

Potential Impacts:

- New contract will result in circa 1,000 e-bikes being introduced to the borough providing more opportunities for usage by residents and visitors. Dockless bikes offer an independent and active mode of travel that can be incorporated to travel habits of people of all ages promoting health, wellbeing and increase independence therefore leading to general improvement of the quality of life (Positive).
- For those older residents whose mobility is not severely restricted, dockless ebikes can offer improved independence by offering another individual mode of transport. Furthermore, e-bikes offer support in more challenging road conditions such as hills which are abundant in Haringey. This can encourage an uptake of cycling for people who would otherwise have to rely on their own physical power

¹³ Method of Travel to Work data widely used in the Transport Assessments as it captures the main trip that a typical person takes on every workday.

¹⁴ https://tfl.gov.uk/info-for/boroughs-and-communities/streetspace-funding



only. Use of dockless bikes can gradually improve the level of fitness and resulting wellbeing and general physical and mental health improvements (Positive).

- Parking locations will be agreed between the operators and the Council and only parking in those locations and other safe locations will be allowed. Formal contract between these two parties will allow more effective enforcement and issuing fines for non-compliance. This is a significant improvement compared to the current unregulated situation in which the Council has limited control over parking locations (Positive).
- Older age groups might be more affected by inappropriate parking and/or abandonment of dockless bikes due to restricted ability to move around them or move them aside (Negative).
- Due to their health and mobility, residents of older and younger age groups are more likely to suffer greater injuries resulting from a collision with bicycle than the other age groups¹⁵ (Negative).
- Feedback during consultation with local advocacy groups has indicated that a significant increase of dockless bikes will lead to increased fear of going out for some older residents due to perceived increased risk of collisions (Negative).
- Due to the cost of hire and their relatively lower income, younger age groups could potentially suffer from greater exclusion than those in older age groups (Negative).
- As dockless bikes can only be hired using a smartphone app there is a greater risk of exclusion from the use of the bikes by those of the older age groups where the use of smartphones is not as common (Negative).

4b. Disability¹⁶

Data Borough Profile ¹⁷

A total of 14% of Haringey residents are disabled under the Equality Act with further 5% having a long term physical or mental conditions which do not affect their day-today life.

An estimated 5,700 Haringey residents aged 14 and over are estimated to have a learning disability, and around 2,100 residents are estimated to have autism.

¹⁵ National statistics, Reported road casualties in Great Britain: pedal cycle factsheet, 2021, Published 29 September 2022

¹⁶ In the Equality Act a disability means a physical or a mental condition which has a substantial and long-term impact on your ability to do normal day to day activities.



Census 2021

Table 2: Disability in Haringey

Disability	Observation	Percentage	
Disabled under the Equality Act: Day-to-day activities limited a lot	16,196	6%	
Disabled under the Equality Act: Day-to-day activities limited a little	19,918	8%	
Not disabled under the Equality Act: Has long- term physical or mental health condition but day-to-day activities are not limited	13,824	5%	
Not disabled under the Equality Act: No long- term physical or mental health conditions	214,300	81%	
Total	264,238	100%	

Findings of the data:

- e) Almost 1 in 5 residents of Haringey suffer from some form of disability that can affect their day-to-day activities.
- f) Furthermore, according to Census 2021 data, 54% of Haringey residents with disability (under the Equality Act) do not have access to a car in their household which could potentially impact their level of mobility and independence.

Potential Impacts

- For those disabled residents whose mobility is not severely restricted, dockless bikes can offer improved independence by offering another individual mode of transport. Furthermore, e-bikes offer support in more challenging road conditions such as hills which are abundant in Haringey. This can encourage an uptake of cycling for people who would otherwise have to rely on their own physical power only. Use of dockless bikes can gradually improve the level of fitness and resulting wellbeing and general physical and mental health improvements (Positive).
- Parking locations will be agreed between the operators and the Council and only parking in those locations will be allowed. Formal contract between these two parties will allow more effective enforcement and issuing fines for noncompliance. This is a significant improvement compared to the current unregulated situation in which the Council has limited control over obstructive parking (Positive).
- A dockless bikes scheme is one of the main initiatives within the Council's Walking and Cycling Action Plan which has a strategic goal of aiding mode shift, improving air quality and reducing overall volume of traffic on Haringey roads. All



of these strategic aims would benefit disabled residents of the Borough (Positive).

- Residents with disabilities, particularly physical disabilities restricting mobility (including blind, partially blind and those on wheelchairs) can be disproportionally negatively impacted by poor and obstructive bicycle parking (Negative).
- Feedback during consultation with local advocacy groups has indicated concerns that people with disabilities can be at greater risk of collision with bikes where they have limited mobility, poorer vision or limited understanding of the traffic operation. There is no data that currently backs this belief and captures number or collisions/ severity with bikes. Haringey is aiming to capture that data with help of the Metropolitan Police Service and bikes operators (Negative).
- Feedback during consultation with local advocacy groups has indicated that a significant increase of dockless bikes will lead to increased fear of going out for some disabled residents due to perceived increased risk of collisions (Negative).
- Some disabled people may be excluded from using dockless bikes due to their lower-than-average level of income ¹⁸(Negative).
- Dockless bikes can only be hired using smartphone app therefore disabled residents with no access to smartphone are excluded from their use (Negative).

4c. Gender Reassignment¹⁹

Data

Borough Profile

According to Census 2021 data 2,146 Haringey residents are trans²⁰ women, men or have gender identity different from the one registered at birth.

Potential Impacts

 There is little to no evidence that presence of dockless bikes would have any differential impact on people who share this protected characteristic (neutral).

4d. Marriage and Civil Partnership

¹⁸ ONS, Disability pay gaps in the UK: 2021

¹⁹ Under the legal definition, a transgender person has the protected characteristic of gender reassignment if they are undergoing, have undergone, or are proposing to undergo gender reassignment. To be protected from gender reassignment discrimination, an individual does not need to have undergone any specific treatment or surgery to change from one's birth sex to ones preferred gender. This is because changing ones physiological or other gender attributes is a personal process rather than a medical one.

²⁰ Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.



Data

Borough Profile ²¹

Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (6.7%)

In a registered same-sex civil partnership: (0.3%)

Married: (27.2%)

Separated (but still legally married or still legally in a same-sex civil partnership): (2.3%)

Single (never married or never registered a same-sex civil partnership): (42.3%) Widowed or surviving partner from a same-sex civil partnership: (2.9%)

Potential Impacts

 There is little to no evidence that presence of dockless bikes would have any differential impact on people who share this protected characteristic (neutral).

4e. Pregnancy and Maternity

Data

Borough Profile 22

Live Births in Haringey 2021: 3,376

Potential Impacts

- Due to their electric support bikes can be used by those who would typically not be able to use traditional bikes and therefore could potentially be used by pregnant and those in maternity as an active and independent mode of transport (Positive).
- Pregnant women are more likely to suffer from more significant injuries resulting from a fall from the dockless bike (Negative).
- Pregnant women and those in maternity are more likely to suffer from greater injuries resulting from a collision with a dockless bike (Negative).
- Young mothers with prams can be affected by abandoned bikes and obstructive parking of bikes (Negative).

4f. Race

In the Equality Act 2010, race can mean ethnic or national origins, which may or may not be the same as a person's current nationality.²³

Data

²¹ Source: 2021 Census

²² Births by Borough (ONS)

²³ Race discrimination | Equality and Human Rights Commission (equalityhumanrights.com)



Borough Profile ²⁴ Arab: 1.0%

Any other ethnic group: 8.7%

<u>Asian: 8.7%</u>

Bangladeshi: 1.8% Chinese: 1.5% Indian: 2.2% Pakistani: 0.8% Other Asian: 2.4%

Black: 17.6%

African: 9.4% Caribbean: 6.2% Other Black: 2.0%

<u>Mixed:</u> **7.0%** White and Asian: 1.5% White and Black African:1.0% White and Black Caribbean: 2.0% Other Mixed: 2.6%

White: **57.0%** English/Welsh/Scottish/Northern Irish/British: 31.9% Irish: 2.2% Gypsy or Irish Traveller: 0.1% Other White: 22.1%

The findings of the data:

- a) Haringey is a very diverse borough with 17.6% of its residents from Black ethnic groups and 8.7% from Asian. In total, 38% of Haringey residents are from BAME groups.
- b) According to the recent Census data 29.7% residents of the borough do not speak English as their main language. This is the 6th highest rate in London, and it is above the London average.
- c) Of those whose English is not the first language in Haringey, 24% either do not speak English well or do not speak it at all. This is the second highest proportion in London.
- d) It is estimated that by 2028, the ethnic group with the highest expected growth will be other and other white growing by 10% each.
- e) According to the latest Travel in London report whilst White people remain over-represented in cycling and the representation of Black people does not

²⁴ Source: 2011 Census



appear to be improving, there has been some progress with Asian and particularly Arab, Mixed and Other ethnic groups since the pandemics.

 According to 2021 Census, 76% of Haringey BAME population is economically active, compared to 80% amongst White population²⁵.

Potential Impacts:

- Some BAME people may be disproportionality excluded from using dockless bikes due to their lower-than-average income (Negative).
- Some BAME groups are disproportionately likely to be disabled compared with the average population and they are therefore more likely to experience negative impacts of dockless bikes (Negative).
- Some people in BAME communities may be disproportionately excluded from using dockless bikes if they do not speak English and no translation is offered for prospective users (Negative).
- Due to their lower-than-average income²⁶ BAME people are statistically less likely to have access to a car. Dockless bikes can offer an additional and costeffective mode of travel for those people (Positive).

4g. Religion or belief

Data

Borough Profile 27

Christian: 39.3% Buddhist: 0.9% Hindu:1.3% Jewish:3.6% Muslim: 12.6% No religion: 31.6% Other religion: 2.3% Religion not stated: 8.0% Sikh: 0.3%

Potential Impacts

 There is little to no evidence that presence of dockless bikes would have any differential impact on people who share this protected characteristic (Neutral).

²⁵ Economically active includes people in full and part time employment, students (full and part-time), unemployed but actively seeking employment or available to start work in 2 weeks as well as combination of those above.

²⁶ https://www.ethnicity-facts-figures.service.gov.uk/work-pay-and-benefits/pay-and-

income/household-income/latest

²⁷ Source: 2021 Census



4h. Sex

Data Borough profile ²⁸ Females: (48.2%) Males: (51.8%)

The findings of the data:

- a) According to the most recent Travel in London report although there has been a steady increase of cycling popularity amongst women, in 2021/22 only 34% of those who cycled are women.
- b) According to Department for International Trade (DIT) the mean hourly difference in ordinary pay between men and women is £1.44 (2022 data) and the median hourly difference is £2.41.

Potential Impacts

- Women may be disproportionately excluded from the use of dockless bikes due to their lower average income ²⁹ (Negative).
- Dockless bikes may offer an additional independent active travel option for those women whose access to other independent travel modes is limited due to the lower income (Positive).

4i. Sexual Orientation

Data

Borough profile ³⁰

3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013. In Haringey this equates to 6,491 residents.

Potential Impacts

 There is little to no evidence that presence of dockless bikes would have any additional positive or negative impact on residents of different sexual orientations.

4j. Socioeconomic Status (local)

Data

Borough profile

Income

²⁸ Source: 2021 Census

²⁹ Transparency data, DIT gender pay gap report 2021 to 2022, Updated 28 November 2022

³⁰ Source: ONS Integrated Household Survey



According to the most recent ONS Claimant Count, 6.8% of the population in Haringey were claiming unemployment benefit³¹.

Of all London, Haringey has the nineth largest proportion that are earning below London Living Wage (19.2%) though this is a significant improvement from recent years.

There is a substantial variation in income between those living in east Haringey and those living in the west. The median hourly pay of residents in Hornsey and Wood Green is £20.71 whilst for those in Tottenham it is £16.77.

Educational Attainment

While Haringey's proportion of students attaining grade 5 or above in English and Mathematics GCSEs is higher than the national average, it is below the London average.

3.7% of Haringey's working age populations had no qualifications in 2021.³² 5% were qualified to level one only.³³

Area Deprivation

Haringey is the 4th most deprived in London. The most deprived LSOAs (Lower Super Output Areas or small neighbourhood areas) are more heavily concentrated in the east of the borough where more than half of the LSOAs fall into the 20% most deprived in the country.³⁴

The borough of Haringey faces great levels of inequalities amongst its population. When considering the delivery of social benefit from dockless bikes, different needs of residents in the west and east of the borough will need to be considered.

Potential Impacts

- Residents on lower income may be excluded from using hire bikes due to their lower-than-average incomes (Negative).
- Dockless bikes have potential to offer another independent travel option for those whose income prevents them from access to a car (Positive).

5. Key Impacts Summary

5a. The key findings

Haringey is a very diverse borough which has large representation of people from BAME communities, various religious backgrounds, and great level of inequalities amongst the residents.

³¹ ONS Claimant Count

³² LG Inform - qualifications

³³ LG Inform – level one

³⁴ State of the Borough



The dockless bike trial will result in up to 1,000 bikes being introduced to the borough providing more opportunities for usage by residents and visitors. Dockless bikes will provide an additional active mode of travel that can be easily accessed throughout the borough and incorporated to travel habits of people of many types promoting health, wellbeing and increase independence therefore leading to general improvement of the quality of life.

It is acknowledged that dockless bikes have potential to have negative impacts on certain individuals and groups, particularly older groups and disabled groups (whether through irresponsible riding by users or through obstructive parking). It is important to note too the intersectionality between disability and other characteristics with a range of racial groups more likely to be disabled compared with the average population. These groups are also more likely to experience socio-economic deprivation and therefore dockless bikes are likely to disadvantage these residents.

However, the appropriate comparison in this instance is the delivery of a managed dockless bike trial in Haringey versus the current situation where at least one dockless bike operator is already operating within the borough without a formal arrangement in place with the Council (rather than the comparison of having dockless bikes in Haringey versus not having dockless bikes in Haringey). Due to the current absence of legislation or regulation, operators are able to operate freely without the need to enter any legal agreement with the Council.

The delivery of a managed trial in formal agreement with the operators will provide an important opportunity to manage and enforce against negative impacts of dockless bikes with greatest benefit for those groups most likely to be impacted by dockless bikes. To do this, the Council will work with the appointed operators to develop as many suitable parking locations as possible and to ensure that users of dockless bikes are encouraged and incentivised to ride and park as safely as possible having regard to the risks to individuals and groups. The operators will be contractually bound to remove obstructing bikes within one hour of reporting and repeat non-compliance will result in the user's ban from the scheme whilst failure to remove obstructing bikes by the operator can result in the early contract termination.

The primary benefits of the scheme are likely to accrue to those groups who are most likely to use the bikes. The CoMoUK Annual Bike Share Report 2022 indicates based on a national survey that:

- males are much more likely to use bike share than females
- bike sharing is used across all age groups but more so by younger people
- bike share schemes are attracting a relatively diverse group of users compared to Britain's general population
- bike sharing, like e-scooter trials, can provide improved access to mobility for socioeconomically disadvantaged communities.

The above survey data refers to bike sharing generally and not just to e-bikes. Haringey's proposed dockless trial will comprise exclusively of e-bikes and for this reason it is important to consider the benefits of improving access to e-bikes



specifically. Electric-assisted bikes provide a potential additional mode of transport for people and groups for whom pedal bikes may not be a viable travel option (at all or for some longer trips or trips involving hills) and the availability of dockless e-bikes could help support them to active travel. As such e-bikes have potential to positively affect individuals and groups with restricted mobility e.g. due to disability, age, or short-term life situation such as maternity).

Through the trial the following will need to be closely mitigated and monitored:

- Due to the nature of the proposed dockless bikes scheme, those with restricted mobility due to disability, short term illness, old age, or maternity have potential to be disproportionately impacted. Those groups would suffer greater negative impact from poor, obstructive parking on footways and highway which could even further limit their mobility.
- Certain social groups, such as BAME individuals, women or younger people who can be disproportionately excluded from using dockless bikes due to their lower income.
- Individuals digitally excluded (with no access to smartphone or sufficient IT skills) will not be able to benefit from the presence of dockless bikes as there are no technical means to access bike rental with no access to technology.
- Some social groups may experience a greater fear of going out due to an increased presence of the mode of travel that they are not familiar with, particularity immediately after the scheme roll out. This can apply to older people and those with physical and mental disabilities. For those groups there might be an increased perceived risk of greater injuries should the collision with a dockless bike occur.

5c. Data Gaps

Currently there is no highway safety data about number of collisions involving dockless bikes and their severity. Data referring to traditional bikes' road safety is also limited. Dockless bikes are a relatively new mode of travel and therefore new methods of gathering data must be developed. Haringey is a part of London-wide Micro-mobility Working Group that brings together London boroughs, service providers and other stakeholders such as Metropolitan Police Service. One of the group's current priorities is to ensure that collision data gathers information about involvement of dockless bikes in the future (as has been seen with the on-going e-Scooter trial, which is running in accordance with legislative directives).

6. Overall impact of the policy for the Public Sector Equality Duty

Formal introduction of dockless bikes in the Borough aligns with the Walking and Cycling Action Plan (2022), Haringey Transport Strategy (2018) and the Mayor of London's Transport Strategy ³⁵. The Council is committed to encouraging mode shift

³⁵ Mayor's Transport Strategy 2018 with 2022 Addendum



from private car into the active travel modes and a provision of an adequate infrastructure aids in achieving this goal. Reduction of traffic on Haringey roads through a mode shift will lead to improvement of air quality, highway safety and aims to tackle climate change which will also benefit residents with protected characteristics.

Currently the Council has no formal agreement with any dockless bikes operator, however as the Borough is not geofenced some bikes are used across the Borough which subsequently leads to existing negative effects on groups with protected characteristics. Entering a formal legal agreement with dockless bike operator(s) will give the Council direct control of the scheme operation and allow enforcement which is currently not possible. This will help the Council to minimise potential negative impacts as far as possible.

Whilst there are several implications resulting from dockless bikes that can have negative impacts on those with protected characteristics, the Council has developed a series of mitigation measures to minimise them as part of a "Haringey Approach" to dockless bikes.

7. Amendments and mitigations

7a. What changes, if any, do you plan to make to your proposal because of the Equality Impact Assessment?

No major change to the proposal: the EQIA demonstrates the proposal is likely to have a range of possible impacts and that while there are potential negative impacts these are to a large extent able to be mitigated or minimised via a "Haringey Approach" to dockless bikes which sets clear expectations around how dockless providers must operate.

7b. What specific actions do you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty?

Actions:

In order to minimise dockless bikes' scheme negative impact on those with protected characteristics a series of mitigating measures will be implemented as part of a "Haringey Approach" to dockless bikes:

- The appointed provider(s) will provide social value through measures such as discounted user prices in areas of lower-income and higher deprivation, concessions providing key workers, students, apprentices and other eligible riders with discounted rides.
- The appointed provider(s) will be obligated to remove any poorly parked bicycle within an agreed timeframe, once reported (currently, as providers are operating in the borough without agreement, they have no obligation or mandate to collect and redistribute bikes, nor is there a definition of what constitutes obstructive parking). The service provider must keep several communication channels open (e.g., smartphone app, telephone number) and clearly visible allowing members



of the public to report abandoned and obstructive bicycles to the operator. The service provider will be contractually bound by the Council to abide the above rules and, should they repeatedly fail to remove abandoned bikes, will receive a fine and can be prohibited from operating in Haringey.

- The Council works with the supplier(s) to develop the best locations for bikes parking where the demand is the highest and the social benefit from modal shift can be greatest. Any agreed parking locations will be monitored throughout the trial period and, if required, the locations can be adjusted.
- Appointed contractor(s) must have a set of clear rules for parking their bicycles set out with the app, as agreed with the Council, and every user must be made aware of those rules ahead of first hire. Providers will be encouraged to run public advertising campaigns to encourage compliant parking of their bicycles. Only parking in areas designated and agreed with the Council will be allowed. Non-compliant users will receive a warning, fine and if repeatedly failing to abide the rules can be banned from the scheme.
- The appointed service provider(s) is required to offer training sessions for bike riders and non-users. These sessions will aim to improve highways rules awareness, road safety and cycling abilities as cyclists as well as one of many road users. Education sessions should be offered to the wider community in form of local events or similar.
- Every user of the scheme must register on-line, provide their personal details and credit card details to access the service. Any incidents with involvement of a dockless bike is therefore easily trackable and the party found guilty can be prosecuted.
- The contractor(s) are encouraged to incentivise the use of helmets and hi-vis clothing amongst its riders. Whilst there is no legal requirement on the national level for the riders to use helmets and hi-vis clothing, cyclists should be continuously educated about its importance to other road users as well as their personal safety.



Lead officer:

Maurice Richards, Transport Planning Team Manager

Timescale: The above actions are to be in place ahead of the scheme roll out and will be continuously monitored and if necessary, amended throughout the duration of the trial.

Whilst the Council and operator(s) liaise to mitigate the majority of negative impacts on those with protected characteristics, no solution can be offered at this stage to those with no access to smartphone / insufficient IT skills. At the moment there are no technical means of enabling non-digital access to dockless bikes and therefore no operator on a market offers it. The Council has a range of workstreams under way set out in Council's Digital Strategy (2021) to tackle digital exclusion.

7. Ongoing monitoring

The scheme is being implemented as a trial (up to 24 months) therefore regular and on-going monitoring will be in place. Information gathered throughout the trial will be used at the end of the trial period to inform the future of dockless bike hire.

The dockless bike scheme falls under the Council's wider borough Walking and Cycling Action Plan and therefore it will share some of the monitoring elements. The Council is continuously gathering traffic data (by mode of travel) using VivaCity cameras and also commissioning traffic counts at regular intervals.

The Transport Planning Team will continue to liaise with the appointed operators and obtain their data on the scheme uptake. The Council will be monitoring numbers of reported obstructive bikes and timeframes of their removal. It also essential to monitor designated parking locations, their demand and level of compliance by the users at each location. The Council will also require the operator to provide up-to-date information about planned local events and their success.

We will also continue to work with the Metropolitan Police Service to monitor the level of highway safety related solely to the proposals. The Council will also keep communication channels open with the residents and key stakeholders allowing them to provide any feedback regarding the operation of the scheme.

Details of further engagement are not yet finalised, however comprehensive engagement will take place to consider voices of as many people as possible, including those with protected characterises.

Further to the actions at the local authority level, Haringey regularly engages with the pan-London Micro-mobility Working Group which gathers Council officers and service providers and offers them the opportunity to develop mitigating measures that allow maximalisation of social benefits at the London-wide level.



Date of EQIA monitoring review:

March 2024

8. Authorisation

EQIA approved by (Assistant Director/ Director)

Rob Krzyszowski

Date

7 September 2023

9. Publication

Please ensure the completed EQIA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EQIA process.