

Written evidence submitted by DriveTech (UK) Limited

About DriveTech

DriveTech offers a comprehensive range of fleet risk management solutions and driver and road user safety training that helps ensure businesses stay compliant with both the law and their duty of care responsibilities as well as keeping drivers safe and efficient. DriveTech operates in the UK, and multi-nationally in over 95 countries through over 40 driver training partners.

DriveTech is the UK's largest provider of driver education within the public and fleet sector. We deliver speed awareness and other driver rehabilitation courses on behalf of 12 police forces and Transport for London, within NDORS (National Driver Offender Retraining Scheme, managed by UKROEd) framework – this delivery is to consumers.

DriveTech is a wholly owned subsidiary of the AA.

Find out more at www.drivetech.co.uk.

Summary

DriveTech has a vested interest in improving road safety and plays an important role in training significant volumes of vehicle users – to observe good practice and safe road use. In the instance of driver-offender retraining, this is to help educate and inform rather than purely punish. Research conducted on behalf of the DfT indicates that driver behaviour improves because of this training.

DriveTech also trains business road-users both in the UK and internationally. The underpinning need for this is to ensure organisations comply with Health & Safety legislation, can demonstrate a clear duty of care to their employees, help reduce collisions, save lives and reduce unnecessary costs.

With the rapid emergence and growing popularity of e-scooters both for leisure, commuting and commercial/delivery applications, DriveTech is passionately committed to work to ensure that they are introduced safely into the UK. DriveTech has both UK and international clients – many of whom are operating in countries where e-scooters are already legal to use.

This submission runs in parallel with the consideration of legalising rental e-scooters and the planned accelerated public rental trials for June 2020 in key UK conurbations.

DriveTech have the experience and capability to support these trials and have made this point separately in that Committee submission.

With the provision of good quality generic (not provider brand scooter specific) e-scooter introductory training to help ensure riders operate safely and in harmony with other road users, DriveTech firmly believes that the provision of practical and safety training must be paramount if e-scooters are to be a true “transport innovation” rather than a “pavement nuisance”. This applies as much to scooter rental as more widespread and owned use.

The points made in that submission are made here for the longer-term and more widespread consideration around legalising e-scooter use in the UK.

On the three road safety “E”s of education, engineering and enforcement, DriveTech has focused its response on the educational aspect: training to improve knowledge, risk appreciation and behaviour are key to a safe introduction. The aim is to provide professional, high quality but accessible training interventions that e-scooter users should be encouraged to experience prior to riding.

With a current stalling in the road casualty reductions year-on-year in this Country, DriveTech are keen that any introduction of e-scooters is of over-riding benefit to users and society as a whole, and certainly not to negatively impact on road casualty statistics and road deaths. In London last year there were a reported 31 injuries and 1 death involving use of an e-scooter. With a larger roll-out to a predominantly untrained set of users, these numbers will be significantly higher.

The use of e-scooters has a number of benefits. They are practical, flexible, eco-friendly, portable and will have the potential to help to solve many of the challenges for powered local individual-use travel and general mobility helping to reduce worsening congestion and air-pollution. This holds a strong appeal and in particular one applicable to urban environments.

However, whilst classified as a Personal Light Electric Vehicle or 'Powered Transporter' (PLEV), users might be very much be regarded as vulnerable road users. Acknowledging that they are currently illegal to use on pavements or roads in the UK, DriveTech recognise that decisions around permitted use will influence any required educational training. With little surrounding protection on road use, this makes the rider vulnerable to larger and more powerful vehicles. On pavements and other walkways there is a greater potential risk to pedestrians, and in particular those with mobility difficulties. We would not endorse their use on pavements where pedestrians must have a safe right of way.

We recognise that for the public e-scooter rental trials proposed for launch in June 2020 that the stipulation is that the scooters be mandated for use on roads (excluding motorways) and dedicated cycle-ways, but not pavements. We agree with this and believe this to be a progressive blueprint for the future.

Even with increasing numbers of dedicated stretches of cycle highways, the emergence and possible introduction of e-scooters means a new “share the road space” etiquette and behaviour to minimise risk and help protect lives.

DriveTech are keen to see public trials and more widespread ongoing use operating successfully and with a clear commitment to and tangible evidence of road safety training for e-scooter users. The public trials should also set a clear precedent in standards expected for any private e-scooter use in the future too.

DriveTech actively supports awareness and behaviour changing campaigns both under the government’s THINK! campaign umbrella, and with other similar campaigns such as the AA Charitable Trust’s own mobile phone distraction and drowsy driver campaigns.

We are aware that our parent company, AA will be making a separate “call for evidence” submission and DriveTech are supportive of the points and statistical support made in that submission.

1. E-scooter safety training is vitally important

- More focus and importance should be placed on this than is currently the case. Some of the introductory guidance provided “in app” at point of subscribing to a proprietary rental service are, by definition, intended to be as short and non-obstructive as possible to allow riders to get up and running fast.
- But a greater emphasis is needed to truly provide quality and longer-lasting instruction on the safe use of e-scooters. This would be significantly better than the trial and error of learning as you go on live and busy roads, and often learning through bitter experience and mistakes.
- A mandated e-learning module would only need to be 15-20 minutes, and could make a significant difference, whilst not detracting from the user experience.
- It should become a default expectation that any e-scooter user has experienced a good, and consistent, minimum standard of training and education pre-use.
- E-scooter users must be versed with the Highway Code, appreciate the fundamentals of road safety, and the risks of interacting on the same road network as heavier, more powerful and less vulnerable riders and drivers.

2. Local Authorities involved in the UK e-scooter trials should strongly encourage (if not move towards mandating) e-scooter training to a recognised and approved minimum introductory level

- DriveTech have already produced a demonstration and indicative e-learning module specifically that covers the key aspects of e-scooter safety. An e-learning module such as this would be invaluable to any new user. It can be enhanced and made more precise once the terms of any legalisation are confirmed.
- The module is accessible on computer, tablet, laptop or mobile smartphone device making the course easily accessible to experience.
- With approval and support, DriveTech would enhance and develop additional content for this module specifically in time for the any trials and for roll-out use. This could be with the cooperation of the key scooter providers and cover all applications of use – from leisure, to commute to business delivery.
- It is produced in a pragmatic and practical way, with a logical sequence, easy step-through processes and a good balance between graphics, (proposed additional) video clips and narrative. DriveTech have experience of producing and delivering such course content.
- The opportunity is to rapidly enhance this demonstration with good quality video footage and any specifics pertinent to the contemplated legalisation in the UK.
- The emphasis is both on the safety of the e-scooter user *and* the other road-users and pedestrians around them.

- Users should be encouraged at every opportunity to experience this safety training video content and the requirement to experience the training should be emphasised in all promotional communications to encourage uptake and use.
- The introduction of a training video from a credible, independent organisation separate from the different e-scooter providers would strengthen the support for general legalisation and help disarm many objections.
- The link to demonstrate this e-learning module can be provided separately on request and in confidence with regards to this consultation and to demonstrate our commitment.

3. Protective/safety equipment and liability

- As riders of cycles and electric-power assisted cycles are not currently mandated to wear a cycle helmet, we do not believe that this can be enforced on e-scooters that have a similar power and speed criteria as some electric-assist cycles. This seems inconsistent. They are similarly vulnerable road users so we believe a consistent rule should apply.
- However, DriveTech believe that riders should always be strongly *recommended* to wear a safety helmet and to consider suitable clothing to provide adequate protection in the event of a collision or other incident causing the rider to inadvertently fall off the scooter.
- DriveTech believe that e-scooter users should have some form of insurance/liability cover, especially if they are to use the road network (excluding motorways and other exempted roads).

4. Offences by e-scooter riders could be dealt with through the same process that DriveTech supports currently in the UK with motorists

- In the same way that key motoring offences are dealt with via Police prosecution, points and penalties, *or the alternative offer of a driver-offender retraining course*, DriveTech can easily apply this model to support law enforcement and rider education for e-scooter offenders. In fact, DriveTech already manage equivalent cycle and seatbelt online courses for UKROEd so have relevant and practical experience.
- This would help eliminate poor e-scooter behaviour and/or control, and oblige the offender to, for example, take the course before operating an e-scooter again.
- This principle could be tested during the UK public trials period (by means of a clear dis-incentive to break the rules of safe use) as well as beyond this into wider geographical and ownership use.
- As a result of the social distancing measures created by Covid-19, driver-offender courses are now delivered digitally (prior to Covid-19 they were traditionally delivered in venues around the country) – making the practicalities of offenders irrespective of age (we note the trial period will oblige any user to be over 16 years of age and hold at least a provisional driving licence) or driving capabilities - easily attending and getting the significant benefit of the learnings to improve behaviour and e-scooter use.

5. A recognised generic provision of e-scooter training would help to continue to maintain standards with continuous improvement

- With a generic but recognised approach to e-scooter training this will likely provide a good platform from which to build and embrace stakeholders and partners that are likely to play an increasingly important role as e-scooters become recognised PLEVs on UK streets
- Insurance considerations and minimum training standards
- Road registration/licencing issues as they develop
- Good blueprinting exercise for further likely roll-out and legalisation of e-scooters

6. General note: Road safety education needs to start earlier in life

- before people start accessing e-scooters and other entry level “vehicles” ideally, with a greater and more formal component in school curriculum
- engender respect for all road users
- behavioural, mood, attitude and psychology components (not just mechanical riding/driving expertise)

7. Consideration could be for an optional first aid component to e-scooter e-learning modules making first aid a requirement of an enhanced learning component:

- this would add value to rider training, and specifically emphasise road safety importance – both for riders and other road users
- it has wider public health benefits beyond the riding environment alone

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