

Donegal County Council
Internal Audit Department



DONEGAL COUNTY COUNCIL
IA21/02 Donegal Road Safety Working Group
FINAL AUDIT REPORT

September 2021

Contents

1.	Executive Summary	3
2.	Assurance Rating	3
3.	Introduction and Scope.....	4
4.	Audit Objectives	5
5.	Methodology	5
6.	Relevant Legislation, Guidance and Circulars	5
7.	Setup and Procedures.....	6
7.1	Budget & Expenditure	7
7.2	Donegal Road Safety Plan 2016-2021	9
7.3	Pro-Social Drivers Programme	9
7.4	Your Life, Your Choice Schools Programme	10
7.5	Road Safe Road Show	10
8.	Findings.....	11
8.1	Road Safety Statistics	11
8.2	Donegal Road Safety Plan 2016-2021	12
8.3	National Road Safety Strategy 2021-2030	13
8.4	Future plans for the Road Safety Working Group	13
9.	Conclusions and Recommendations	14
9.1	Road Safety Statistics	14
9.2	Donegal Road Safety Plan 2016-2021	14
9.3	National Road Safety Strategy 2021-2030	15
9.4	Future plans for the Road Safety Working Group	15
	Acknowledgement.....	16
	Appendix 1 – Circulation List	17
	Appendix 2 – Audit Classification	18
	Appendix 3 - IA21/02 Donegal Road Safety Working Group - Summary Recommendations	19
	Appendix 4 – RSA Road Fatalities Statistics 2020.....	20

1. Executive Summary

Each Local Authority, including Donegal, established a Road Safety Working Group to co-ordinate multi-agency road safety policy and implementation at a local level. Since their inception, the number of deaths on Irish roads has fallen from 458 in 1998 to 148 in 2020. In 1998, Ireland had 124 deaths per million of population, compared to 30 deaths per million in 2020. Ireland is now one of the safest countries in Europe with a 76% reduction in deaths per million over this time period.

Road fatalities have fallen as a direct result of the work carried out by the various Working Groups that have focused on several key areas:

- Measuring, targeting and monitoring progress
- Improved EU vehicle safety standards and consumer information
- Increased enforcement
- Improved road user standards
- Improvements in road engineering
- Improvements in medical interventions
- Targeted delivery of evidence-based road safety education and awareness programmes.

This audit focused on the objectives of the Donegal Road Safety Working Group and the various programmes put in place to achieve these goals. Internal Audit found that the advent of Covid-19 in 2020 and the various restrictions put in place have impacted the activities of the Working Group over the past 18 months. This may have an effect on the overall goals of the Group and controls may need to be implemented to ensure that both short-term and long-term objectives are achieved as expected.

2. Assurance Rating

This audit has been assigned an assurance rating of:

Level 2 – Adequate

See **Appendix 2** for Classification of Audit Assurance.

On the basis of the work carried out in this audit, Internal Audit found that there is an adequate system of risk management, control and governance in place in relation to the operations of the Donegal Road Safety Working Group.

As highlighted in the Executive Summary, the main area of risk facing the Working Group is the implementation of Covid-19 social distancing restrictions and their impact on the public programmes such as the Road Safe Roadshow and school information events which are an integral part of the annual activities of the Group.

There is a risk that some objectives may not be fully achieved as a result of these changes and the Working Group may have to re-assess its annual programme and make changes where appropriate.

The draft audit was circulated to relevant managers and staff on 28th August 2021. Any responses and comments received have been incorporated in the completion of this report. Internal Audit's findings and recommendations for remedial action, where applicable, are included herein.

3. Introduction and Scope

Educating the public about different aspects of road safety has been a large part of the Irish Government's role since the 1940's. The Road Safety Authority (RSA) and the Medical Bureau of Road Safety (MRBS) are the main bodies which provide guidance and oversight of road safety in Ireland.

In 1996, in response to the rising number of fatalities on Irish roads, the Minister for the Environment requested the establishment of working groups for road safety at local level. The aim of these groups was to co-ordinate the efforts of all the agencies involved with road safety in order to reduce the number of road accidents.

The Road Safety Authority (RSA) was established under the Road Traffic Act 2006 and operates under the auspices of the Department of Transport (DoT). The RSA has taken over much of the road safety functions previously carried out directly by the Department and its primary function is to promote and improve road safety in Ireland.

The RSA's current policy framework for road safety is set out in the Road Safety Strategy 2013-2020. This strategy set out a target of a reduction in road collision fatalities on Irish roads to 25 per million population or less by 2020. This meant planning on reducing deaths on Irish roads from 162 in 2012 to 124 or fewer by 2020. A target for the reduction of serious injuries by 30% from 472 (2011) or fewer to 330 by 2020 or 61 per million population was also set out.

The strategy has an Action Plan of 144 actions based around shared responsibility, accountability and a deadline for completion. The Strategy focuses on the key areas of:

- Road fatalities
- Serious injuries
- Seatbelt wearing rates
- Compliance with speed limits

The overarching goal is to make Ireland the safest country in Europe for all road users - drivers, passengers, motorcyclists, cyclists and pedestrians.

The establishment of working groups within each Local Authority was facilitated in order to provide a localised, co-ordinated approach to road safety in every county.

IA21/02 - Donegal Road Safety Working Group – Final Audit Report

The Donegal Road Safety Working Group (DRSWG) is co-ordinated by Donegal County Council since its inception in 1997 and the work of the Working Group is the subject of this audit.

The scope of this audit is as follows:

- Research relevant Legislation in relation to road safety in Ireland
- Assess the activities of the Donegal Road Safety Working Group over the life cycle of the most recent Road Safety Plan
- Assess how Covid-19 protocols have impacted activities such as road safety campaigns over the past year
- Determine future plans for the group

4. Audit Objectives

The main objectives of this audit were to:

- Gain a better understanding of the work of the DRSWG
- Assess Donegal County Council's role within the Working Group
- Assess the different programmes implemented as part of the Road Safety Plan
- Ascertain how road safety programmes have been affected by Covid-19 restrictions
- Determine the long-term strategy and overall goals of the DRSWG

5. Methodology

The audit was approached as follows:

- The relevant legislation and policies & procedures were assessed
- The current Road Safety Plan was reviewed
- The programmes implemented as part of the Road Safety Plan were assessed
- Engagement with Donegal County Council staff involved in the Road Safety Working Group
- Various statistics were reviewed in relation to road safety within the county and on a national level
- Any potential risks in policy and procedures were identified and recommendations made for remedying same

Note: Due to the current restrictions imposed under Covid-19 protocols, meetings and interviews with relevant persons were carried out remotely and social distancing guidelines were observed at all times throughout this audit.

6. Relevant Legislation, Guidance and Circulars

- Road Traffic Acts 1961-2016
- Road Safety Authority Act 2006
- Donegal Road Safety Plan 2016-2021 – Donegal Road Safety Working Group

- European Road Safety Charter
- EU Road Safety Policy Framework 2021–2030: “*Next steps towards 'Vision Zero'*”
- National Road Safety Charter 2013-2020

It should be noted that this is not a comprehensive list of all the legislation and guidance documents issued in relation to road safety in Ireland. The most appropriate documentation in relation to the work of the DRSWG has been included.

7. Setup and Procedures

The Donegal Road Safety Working Group (DRSWG) was set up in 1997 with the goal of improving road safety within the county. The DRSWG is an interagency group which involves the membership of a number of key stakeholders including Donegal County Council. The other members of the group are:

- Transport Infrastructure Ireland (TII)
- An Garda Síochána
- The Road Safety Authority (RSA)
- The Health Safety Executive (HSE)
- Donegal Youth Service (DYS)
- Donegal Education and Training Board (Donegal ETB)
- Pro Social Drivers Programme (PSDP)
- North West Alcohol Forum

The group produces a six-year Road Safety Plan to ensure a co-ordinated, collaborative and consistent approach to improving road safety for all road users. This plan is achieved by a series of strategic objectives centered on five core elements: Education, Engineering, Enforcement, Evaluation and Empowerment. To date four Road Safety Plans have been produced by the DRSWG with the most recent plan covering the period 2016-2021.

The main activities of the group include:

- Collision Prevention Programme:
 - Joint meetings between an Garda Síochána and Donegal County Council on an electoral area basis to address local road safety issues
 - Road Safety Programmes in schools
- Multi agency presentations in schools
- Primary School Road Safety Art competition
- Donegal Road Safe Show
- Supply of educational materials
- Road Safety Public Awareness campaigns:
 - Radio and newspaper campaigns
 - Distribution of Leaflets
 - Safety mascot

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There are currently 3 Donegal County Council staff members on the working group: A Senior Staff Officer, an Assistant Engineer and an Executive Engineer.

The group meets on 11 occasions each year with no meeting taking place in August. The minutes of each meeting are recorded and distributed among the group.

7.1 Budget & Expenditure

Although there is no specific job code for the Working Group, there is a budget assigned to the Agresso job code [REDACTED]. This budget is circa €70,000 and is presented for approval to Finance each year. The budget must in the first instance cover the Donegal County Council's own costs and then other road safety support costs thereafter.

In order to deliver on DCC's requirement to prepare the Road Safety Plan and to deliver on the educational requirements of the Working Group, the budget goes towards the deliverables of the Road Safety Plan and covers areas such as:

- Advertising
- Community events
- Educational material
- Sponsorship
- Printing
- Office consumables

Approximately €10,500 was allocated in 2021 for Council costs; this was reduced due to Covid-19 restrictions. A portion of the budget is assigned to DCC costs associated with the delivery of Road Safety and management of the Working Group with other parts of the budget assigned to fund particular outputs desired by the Group.

Road Safety Working Group Budget 2021

Acc	Account Desc	Job	Job Desc	Draft Budget 2021 (€)
67500	Non-Capital Equip Purchase - Computers	[REDACTED]	ROAD SAFETY CAMPAIGN	500
70000	Materials	[REDACTED]	ROAD SAFETY CAMPAIGN	4,000
70990	Issues from Stores	[REDACTED]	ROAD SAFETY CAMPAIGN	500
71600	Prizes, sponsorship etc	[REDACTED]	ROAD SAFETY CAMPAIGN	2,000
71700	Community Events	[REDACTED]	ROAD SAFETY CAMPAIGN	18,000

IA21/02 - Donegal Road Safety Working Group – Final Audit Report

73400	Staff Travelling & Subsistence Expenses		ROAD SAFETY CAMPAIGN	500
74500	Entertainment and Associated Expenses		ROAD SAFETY CAMPAIGN	500
75000	Computer Software and Maintenance Fees		ROAD SAFETY CAMPAIGN	500
76000	Communication Expenses		ROAD SAFETY CAMPAIGN	400
77100	Courier		ROAD SAFETY CAMPAIGN	100
78000	Training		ROAD SAFETY CAMPAIGN	8,000
80000	Advertising		ROAD SAFETY CAMPAIGN	21,650
81000	Printing & Office Consumables		ROAD SAFETY CAMPAIGN	30,400

The main expenditure for the Road Safety Working Group for the period 2001-2021 is broken down as follows:

Expenditure Area	Amount (€)
Stores Purchases	850,956.87
Payroll	763,394.79
Advertising	348,305.76
Office expenses	243,714.37
Training	146,214.76
Materials	120,164.64
Travel Expenses	85,308.56
Miscellaneous expenses	57,471.89
Events	50,643.42
Repairs	18,805.69
Communication expenses	10,765.41
Entertainment costs	9,990.87
Sponsorship	8,591.39
Plant & Equipment	6,383.48
Consultancy	4,586.76
Insurance	3,738.17
Courier costs	2,518.33
Contributions	2,049.47
Total	2,733,604.63

7.2 Donegal Road Safety Plan 2016-2021

The most recent Road Safety Plan has been produced by the DRSWG with the primary objective of improving road safety in Donegal for all road users and reducing the number of fatalities on Donegal roads from an average of 14 to 10 by the end of 2021 in line with targets in the National Strategy. The current yearly average to date is 9.

The Donegal Road Safety Plan 2016-2021 is a collaborative, co-ordinated approach to road safety and involves a number of key stakeholders. This is the fourth plan produced by the group with previous plans helping to reduce road deaths in the county by 50% since 2015.

The plan focuses on 5 core themes as outlined in the National Road Safety Strategy:

1. Education - safety campaigns and training schemes
2. Engineering – making the road network safer
3. Enforcement - testing and licensing, increasing compliance with traffic laws
4. Evaluation – road safety research, measuring effectiveness of initiatives
5. Empowerment – taking personal responsibility for road safety

Each of these areas has an action plan with goals and performance indicators set out over the life cycle of the Road Safety Plan. The DRSWG is committed to working with local communities through a number of interactive programmes under the core themes of the Road Safety Plan.

The current plan continues to consolidate and build on the achievements of previous plans and concludes this year. Work is currently ongoing preparing a new plan covering the period 2022 – 2030.

7.3 Pro-Social Drivers Programme

This initiative was first rolled out in 2012 and aims to improve the driving behaviour of “higher risk groups”. Course participants complete a course consisting of lectures and classes covering areas such as: social responsibility, emotional control, driving under the influence and the consequences of anti-social behaviour.

Candidates are referred to the course by a number of different sources such as the legal system, concerned parents and self-referral. The programme is designed around and underpinned by the “Reasoning & Rehabilitation 2” programme and international best practice in driver rehabilitation.

These programmes are used in several countries and aim to reduce reoffending by addressing the issues that led to an individual committing the act in the first place.

7.4 Your Life, Your Choice Schools Programme

This programme was launched in February 2020 and was developed by Donegal County Council, An Garda Síochána and Pro Social Ireland and is targeted at Transition Year (TY) students in Secondary schools.

The programme is divided into three key areas:

- A presentation by an Garda Síochána demonstrating the cause of collisions and outlining the consequences of driver behaviour
- The use of Virtual Reality headsets which simulate a serious road traffic collision, with the viewer participating in the passenger seat of a VR car
- Pro Social Ireland highlight the importance of how driver choices have consequences emphasising how poor decision making on the roads can lead to fatal outcomes

7.5 Road Safe Road Show

Education is the primary focus of the Donegal Road Safety Working Group which works to improve the behaviour of road users and in turn reduce road deaths. The Working Group has developed the Road Safe Road Show in order to improve road safety and reduce the impact of road traffic collisions on communities and families in Donegal.

The road show has been running since 2009 and is attended annually by over 2,500 students and learners from post-primary schools, Youthreach and other training centres meaning that to date around 27,500 young people have attended the road show since its inception. In 2015 the RSA Leading Light award in the Public Service Category was awarded to the Donegal Road Safe Show as an acknowledgement of the work carried out by participants since the show was first launched.

Owing to Covid-19 restrictions the road show did not take place in 2020 and is also unlikely to be held in 2021 due to continuing restrictions. The Road Safety Working Group plans to hold the road show in 2022. However, this will be dependant on whether Covid-19 restrictions are still in place and the working group will be tasked with ensuring that the road show is added to the school calendar when permitted under any restrictions.

8. Findings

8.1 Road Safety Statistics

The Road Safety Authority compiles statistics in relation to traffic collisions and releases these figures when available. The tables and graphs below outline the most up to date statistics in relation to road accidents in Ireland.

Road Fatalities in Ireland 2020

County	Total
Cork	24
Dublin	20
Donegal	10
Kerry	9
Louth	9
Meath	8
Tipperary	7
Wexford	6
Roscommon	5
Mayo	5
Galway	5
Kilkenny	5
Limerick	5
Offaly	4
Kildare	4
Westmeath	4
Clare	3
Carlow	3
Monaghan	3
Sligo	2
Cavan	2
Wicklow	2
Waterford	2
Leitrim	1
Longford	0
Laois	0
Overall Total	148

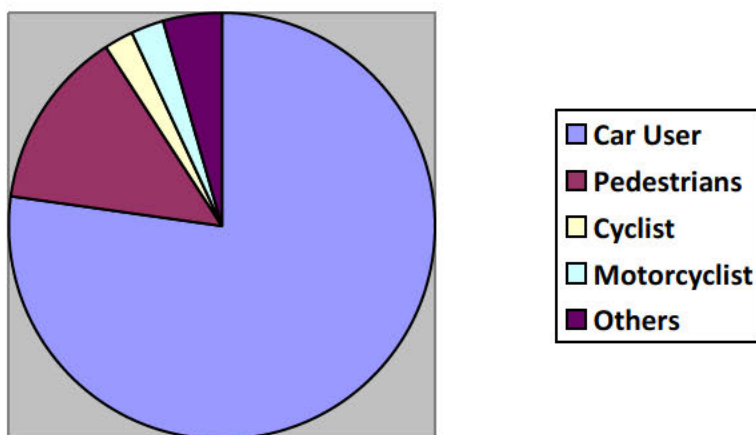
*Data as at 31/12/20

Ireland had 30 road deaths per million inhabitants in 2020, which is one of the lowest rates in the EU. However, the number of road fatalities increased by 6% in 2020 following a 1% rise in 2019. Between 2010 and 2020, although fatalities fell by around 30%, this was at a slower pace than the EU average.

Road Fatalities in Donegal 2010-2020

Year	Total	Year	Total
2010	19	2016	10
2011	6	2017	6
2012	7	2018	10
2013	13	2019	8
2014	9	2020	10
2015	11		

Donegal Road Fatalities, 2016-2020 by Road User



In total there have been 92 fatalities to date (20/08/2021) on Irish roads in 2021 compared to 89 for the same period in 2020, a County by County breakdown is not made available until year end. There have been four fatalities for the same period on Donegal Roads in 2021.

8.2 Donegal Road Safety Plan 2016-2021

The Road Safety Plan has been severely impacted by Covid-19 restrictions imposed nationally in 2020 and 2021. The restrictions have meant that programmes under the plan such as the Road Safe Road Show and “Your Life, Your Choice” School Programmes did not take place in 2020 and have not taken place in 2021 to date.

At present, the Roadshow is scheduled to take place in October; however, this will be dependent on the Covid-19 restrictions in place at that time. With some restrictions likely to remain going forward into 2022, there is a level of uncertainty on how programmes under the Road Safety Plan will be rolled out next year.

Response from Road Safety Officer:

"With Covid 19 restrictions in place the show was cancelled in 2020. Going forward, if the show is not on school calendar this year it will become very difficult to get schools on board again".

8.3 National Road Safety Strategy 2021-2030

The Road Safety Authority has been working with stakeholders and key agencies to develop the next Government Road Safety Strategy for the period 2021-2030 and has been engaging in public consultation to ascertain the views of relevant stakeholders as part of this process.

The consultation process focused on five key themes:

1. Ireland's road safety priorities for the next 10 years
2. How these priorities should be addressed
3. What elements of the current National Road Safety Strategy should be considered when planning the government's next Strategy?
4. What can be learned from others?
5. Other suggestions from the general public

One of the primary drivers of the new Road Safety Strategy will be the "Vision Zero" approach to road safety in Ireland. This initiative has the ultimate goal of having no deaths or serious accidents on the country's roads by 2050 using a technological approach and placing road safety at the centre of government policies and systems. This strategy was first adopted in Sweden in the 1990's and has since been implemented in several other European countries.

The new National Road Safety Strategy was due to be finalised and rolled out in March 2021. However, to date, the Road Safety Working Group have not received the finalised plan and are still awaiting confirmation on when the new plan will be implemented.

8.4 Future plans for the Road Safety Working Group

The new Road Safety Strategy is now scheduled to be introduced in 2022 and its approval and implementation will be the primary focus of the DRSWG in the short-term. This Strategy will drive the activities and programmes of the group for the period 2021-2030.

The delay in the roll out of the Strategy has meant that the DRSWG have been unable to plan for potential new programmes under the new plan, meaning possible delays in the implementation of these programmes which may possibly affect their effectiveness in targeting key demographics.

9. Conclusions and Recommendations

It is recommended that the findings in this report be considered and that appropriate remedial action be taken where necessary.

9.1 Road Safety Statistics

Conclusion

The fall in fatalities as a result of Road Traffic Accidents in the country as a whole and particularly in Donegal has emphasised the importance of the Road Safety Working Groups and the work they carry out.

With a 77% reduction on road fatalities nationally since 1998, Ireland is now one of the safest countries for road users in Europe. On average, 9 people have lost their lives on Donegal roads each year over the past 5 years. This represents an above average number of deaths per head of population compared to the national average.

It is worth noting that road deaths in Donegal increased in 2020 despite the fact that traffic was vastly reduced in the aftermath of Covid-19 restrictions on movement. This suggests the work carried out by the DRSWG is still vital in the effort to continue to improve road safety in the county.

Recommendation

No recommendation

9.2 Donegal Road Safety Plan 2016-2021

Conclusion

The improvement of road safety statistics in County Donegal coupled with the attendances at events such as the Road Safe Roadshow has highlighted the importance of the work of the DRSWG and its effect on road safety within the county.

The advent of the Covid-19 pandemic and the resulting restrictions on public gatherings over the past 18 months has impacted the work of the group however, and it is imperative that efforts be made to ensure that the programmes previously implemented are restarted as soon as possible.

Recommendation

It is recommended that the DRSWG liaise with both Senior Management and the RSA to put in place a timeline for implementing new programmes under the new Donegal Road Safety Plan in 2022. This projected timeline should be monitored on a regular basis to adapt to new circumstances as Covid-19 restrictions are changed.

9.3 National Road Safety Strategy 2021-2030

Conclusion

The new National Road Safety Strategy was due to be approved and implemented in March 2021, however a draft of the Strategy is yet to be approved and the DRSWG has not received any communication on when same will be made available.

The delay in the roll out of the new Strategy has also impacted the work of the DRSWG and their planned programmes over the life cycle of the Strategy.

Recommendation

It is recommended that clarification be sought from both the RSA and the Department of Transport on the roll out and implementation of the new National Road Safety Strategy.

A definite timeline will aid the DRSWG put in place the new Donegal Road Safety Plan and the resulting programmes for continuing the work of previous plans.

9.4 Future plans for the Road Safety Working Group

Conclusion

Due to the current Donegal Road Safety Plan coming to the end of its lifecycle this year, it is imperative for the DRSWG roll out their incoming Plan as quickly as possible.

The restrictions on public gatherings imposed as a result of Covid-19 has meant that key programmes under the current Plan were unable to be carried out and demographics targeted under the education element of the Plan, were unavailable as a result.

Recommendation

It is recommended that a report be carried out on the projected numbers for attending public information events under the current Plan. If possible, the demographics targeted by these events should be included in other areas of the incoming Plan to ensure that they are included under the education element of the Plan.

It is also recommended that different means of conducting information events on behalf of the Working Group are assessed for suitability. During the lockdown restrictions in 2020 and 2021 the I.S. Section of Donegal County Council facilitated a number of Council meetings in the Aura Leisure Centre. Wi-Fi networks were configured and integrated into the broadband network at the Aura for these events and suitable audio systems were put in place. A similar arrangement may be suitable for information events should restrictions continue into 2022.

Update from Road Safety Officer:

“Following the recent Government announcement, as from 22 October 2021, subject to public health advice, restrictions on numbers that can attend events no longer apply, which will apply to indoor events. As part of the DRSWG Education and Awareness programme, the Road Safe Show is provisionally booked for 9th & 10th November 2021 in the Aura Leisure Centre, Letterkenny, subject to public health advice”.

Acknowledgement

I would like to acknowledge the assistance and co-operation of Donegal County Council staff in the Donegal Road Safety Working Group in the course of this Audit.

Sean Canning

**Sean Canning,
A/INTERNAL AUDITOR.**

Appendix 1 – Circulation List

20/09/2021 **Final Report sent to:**

[Redacted]
[Redacted]

Copied to:

[Redacted]
[Redacted]
[Redacted]
[Redacted]

03/09/2021 **Draft Report sent to:**

[Redacted]

Copied to:

[Redacted]
[Redacted]
[Redacted]
[Redacted]

Appendix 2 – Audit Classification

Level	Definition
1. Substantial	<p>Evaluation Opinion:</p> <ul style="list-style-type: none"> - There is a robust system of risk management, control and governance - The systems in place should ensure that objectives are fully achieved - The control processes tested are being applied consistently
2. Adequate	<p>Evaluation Opinion:</p> <ul style="list-style-type: none"> - There is a generally adequate system of risk management, control and governance - The systems in place should ensure that essential objectives are fully achieved - The control processes tested are, in general, being applied consistently - However, there are some weaknesses in control that are placing some objectives at risk. There is a risk that some objectives may not be fully achieved - Some improvements are required to enhance the adequacy and/or effectiveness of risk management, control and governance
3. Limited	<p>Evaluation Opinion:</p> <ul style="list-style-type: none"> - There is a weak system of risk management, control and governance - There is considerable risk that objectives will not be achieved - The control processes that exist are not being applied consistently - There are some significant weaknesses in control in a number of areas - Prompt action is required to improve the adequacy and effectiveness of risk management, control and governance
4. Unsatisfactory	<p>Evaluation Opinion:</p> <ul style="list-style-type: none"> - There is an inadequate system of risk management, control and governance - The system has failed or there is a real and substantial risk that the system will fail to meet its objectives - Systems/processes are open to significant error or abuse - Urgent action is required to improve the adequacy and effectiveness of risk management, control and governance
5. No Assurance	<p>Evaluation Opinion:</p> <ul style="list-style-type: none"> - Internal Audit has been unable to form an opinion on the system of risk management, control and governance - Internal Audit has been unable to access or has been prevented from accessing essential information required to form an opinion - Internal Audit has not received the cooperation of staff/management

Appendix 3 - IA21/02 Donegal Road Safety Working Group - Summary Recommendations

	Material Issues Identified	Response from Directorate	Follow-up Actions undertaken by	Timeline
1	<p><u>8.2 Donegal Road Safety Plan 2016-2021</u></p> <p>It is recommended the DRSWG liaise with both Senior Management and the RSA to put in place a timeline for implementing new programmes under the new Donegal Road Safety Plan in 2022. This projected timeline should be monitored on a regular basis to adapt to new circumstances as Covid-19 restrictions are changed.</p>	<p>Following the publication of the national strategy in Dec'21 Road Safety Officers across all LAs are co-ordinating the drafting of their respective Road Safety Plans (RSP). The Donegal RSP is currently being drafted with publication planned in 2022.</p>	<p>A/DOS Roads</p>	<p>2022</p>
2	<p><u>8.3 National Road Safety Strategy 2021-2030</u></p> <p>It is recommended that clarification be sought from both the RSA and the Department of Transport on the roll out and implementation of the new National Road Safety Strategy.</p>	<p>The Road Safety Strategy 2021-2030 was launched in December 2021. Guiding this strategy is Vision Zero, Ireland's long-term goal of achieving zero road deaths or serious injuries by 2050.</p>	<p>A/DOS Roads</p>	<p>2021</p>
3	<p><u>8.4 Future plans for the Road Safety Working Group</u></p> <p>It is recommended that a report be carried out on the projected numbers for attending public information events under the current Plan.</p> <p>It is also recommended that different means of conducting information events on behalf of the Working Group are assessed for suitability.</p>	<p>A full calendar of events, press releases and activities has been put in place for 2022 and is being implemented following the unwinding of restrictions associated with the COVID-19 pandemic.</p> <p>Numbers attending events and the reach of various media campaigns is reported to the DRSWG regularly at meetings for review and comment so that amendments may be made, or new initiatives explored.</p>	<p>A/DOS Roads</p>	<p>2022</p>

