Submission to Road Safety Authority:
Road Safety Strategy 2021-2030

November 2020

1. Introduction

Age Action welcomes the opportunity to input into the development of the Government's next Road Safety Strategy for the years 2021–2030 through the Road Safety Authority (RSA). It does so understanding that Ireland needs to plan for an ageing population that will see the number of people aged over 65 increase to close to 1.4 million by 2041,[1] from one-fifth to over one-third of the working population over the next two decades.

In making these observations on the next Road Safety Strategy, Age Action draws on the statutory obligation on public bodies to eliminate discrimination, promote equality of opportunity and protect the human rights of those to whom they provide services and staff when carrying out their daily work under the Public Sector and Human Rights Duty.[2] We welcome it's role to place 'equality and human rights at the heart of how a public body fulfils its purpose and delivers on its strategic plan'.[3]

2. Context

2.1 Policy Context

Road safety is vital to promoting the physical and mental health of older people as pedestrians, cyclists and drivers.

The National Positive Ageing Strategy in 2013 sets out what Government departments and public agencies must do to make Ireland a great place in which to grow old.[4] Goal 2 of the strategy aims to 'Support people as they age to maintain, improve or manage their physical and mental health and wellbeing'.[5]

The 2020 Programme for Government outlined an age friendly Ireland. Commitments under the Programme include to task each local authority with an urgent review of their road network to look at space for pedestrians and cyclists and to introduce a new road safety strategy focussed on reducing deaths and injuries of vulnerable groups.

The current RSA Road Safety Strategy 2013—2020 specifically notes older people as a particular category for planning and services. It acknowledges that many older people continue to drive – and are reliant on their cars for access to services as well as to combat isolation. It continued the 'Mobility Matters' programme to encourage older drivers to continue for as long as possible in a safe manner, and it committed to support this planning via the National Programme Office for Traffic Medicine. In the data in the Strategy (2007-2012), of concern was the data that one in three pedestrians killed were aged over 65.

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[1] See http://rebuildingireland.ie/Rebuilding%20Ireland_Action%20Plan.pdf
[2] Set out in Section 42 of the Irish Human Rights and Equality Commission Act 2014.
[3] IHREC (2019) *Implementing the Public Sector Equality and Human Rights Duty*. Available at www.ihrec.ie.
[4] Department of Health (2013) *National Positive Ageing Strategy.* Available at https://www.gov.ie/en/publication/737780-national-positive-ageing-strategy/ .
[5] *Ibid.*

According to the most recent 2016 Census figures, the number of people aged over 65 saw the largest increase of population since 2011. This age group has increased since 2011 by 19.1% (to 637,567). The number of people aged over 85 increased by 15.6% (to 67,555).[6]

At present, just over 13% of the total population is over 65 years of age.[7] Each year in Ireland, the over 65 age group increases by 20,000 people.

The number of people aged over 65 is projected to increase very significantly to close to 1.4 million by 2041,[8] from one-fifth to over one-third of the working population over the next two decades. The Department of Health's Capacity Review outlines that, on the basis of the CSO's moderate population projection scenario (M2F2), the 65-74 age cohort will increase by 42.9%, the 75-84 age cohort will see an increase of 75.9% and the 85+ cohort will see an increase of 95.5% by 2031 from 2016 figures. Regional projections for 2016-2031 show the number of older persons (over 65) will almost double in every region over that time period.[9]

Central to any policy and service developments under the new Strategy is the need to take account of those not online in Ireland. Older people in Ireland are currently less likely than people of other ages to use the internet or to have good digital skills. While there has been an increase in those aged 55-74 who are online in recent years, this group largely has below basic digital skill levels[10] which means they are unlikely to be able to use the internet independently or safely: 43% have digital skills below basic levels, and 24% have never been on the internet.[11] It is estimated 50% of over 70's in Ireland have never used the internet.[12] A third (33%) of those aged 60-74 in Ireland have never been on the internet.[13]

3. Themes and Age Action Recommendations

To enable ease of reading, Age Action has grouped the below recommendations within the themes specified in the consultation document for this process by the RSA.

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[6] See http://cso.ie/en/media/csoie/newsevents/documents/pressreleases/2017/prCensussummarypart1.pdf

[7] See http://www.cso.ie/en/releasesandpublications/er/q-cv/qnhscrimeandvictimisationq32015

[8] See http://rebuildingireland.ie/Rebuilding%20Ireland_Action%20Plan.pdf

[9] See http://www.cso.ie/en/releasesandpublications/er/rpp/regionalpopulationprojections2016-2031

[10] Eurostat defines basic digital skills through a competence framework that can be simplified as: being able to find information about goods and services, send an email, buy something online and use word processing software. See https://ec.europa.eu/eurostat/cache/metadata/en/tepsr_sp410_esmsip2.htm

[11] Eurostat (2019) *Digitals skills: Individuals level of digital skills*. Available at https://ec.europa.eu/eurostat/web/digital-economy-and-society/data/database

[12] Central Statistics Office (2020) *Impact of COVID-19 on ICT usage by Households*. Available at https://www.cso.ie/en/releasesandpublications/ep/p-ictc19/impactofcovid-19onictusagebyhouseholds/frequencyofinternetusage/

[13] Eurostat (2019). *ICT usage in households and by individuals: Individuals: Internet use*. Available at https://ec.europa.eu/eurostat/web/digital-economy-and-society/data/database

Theme 1: What should Ireland's road safety priorities be for the next 10 years?

Priority 1. Continued action to reduce pedestrian fatalities and facilitate safe walking and cycling for those aged over 65

Over 65s continue to account for a disproportionate number of pedestrian fatalities, and this proportion has not fallen significantly under the previous 2013-2020 road safety strategy. EU figures show that in 2014, some 38.7% of Irish pedestrian deaths were in those aged over 65.[14]

Two years later – three years into the implementation of the current road safety Strategy – the figure remains static at 38.09% of pedestrian deaths in 2016.[15] Looking at the overall percentage of the population aged over 65 in 2016 – 13% according to Census 2016 – these figures remain alarming.

Remaining active is vital for health and wellbeing, and separated walking infrastructure and cycling infrastructure on roads is essential to enable older people to safely use these transport modes.

Priority 2. Promote safe driving for as long as possible, and support safe transitions for those that can no longer retain a licence

We know that mobility, health and wellbeing are intertwined and a loss of mobility is associated with declines in quality of life, independence and physical and mental health.[16]

The current RSA Strategy recognises the role that driving plays for many in older age, allowing a retention of independence, access to services (particularly in rural areas) and the combatting of social isolation. It is vital that this need continues to be reflected in the new Strategy.

Priority 3. Adopt an integrated whole-of-government action on road safety

All priorities in the new Strategy should be supported with dedicated actions and responsibilities across Government to create integrated outcomes. There are a range of factors that impact on road safety concerns for those aged over 65 that currently sit across Strategies and with varied Government Department and agency responsibility (discussed further below)

We urge the new Strategy to act as a focal point to enable and promote collaboration and accountability across Government and agencies to ensure delivery and adoption of responsibility.

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[14] See
https://ec.europa.eu/transport/road_safety/sites/roadsafety/files/pdf/statistics/dacota/asr2016.pdf
[15] See
https://ec.europa.eu/transport/road_safety/sites/roadsafety/files/pdf/statistics/dacota/asr2018.pdf
[16] European Commission (2015). *Eldersafe: Risks and countermeasures for road traffic of the elderly in Europe.* Available at:
https://ec.europa.eu/transport/road_safety/sites/roadsafety/files/pdf/studies/eldersafe_final_report.pdf

Theme 2: How do you think these priorities should be addressed?

Priority 1: Continued action to reduce pedestrian fatalities and facilitate safe walking and cycling for those aged over 65

2.1.1 Include a commitment in the forthcoming Road Safety Strategy to develop an up-to-date cross-government National Pedestrian Safety Action Plan. The previous National Pedestrian Safety Action Plan expired in 2014 and has not yet been updated, however the need for a plan of this type is greater than ever in the context of a rapidly ageing population and the move to promote more active transport throughout Ireland as seen in the Programme for Government

An ageing population will mean higher numbers of older pedestrians, with safety being essential to support people to maintain independence and health by remaining active through walking in their local community or elsewhere.

Both the move to promote active transport through current Government policy and the on-going developments regarding public transport public health advice during COVID-19 is likely to put pressure on existing facilities and increase the proportion of non-vehicular traffic.

This further heightens the need for a strategic approach to pedestrian safety, particularly for vulnerable road users already identified in previous strategies which includes those aged over 65. As evidenced above, just under 40% of pedestrian deaths in Ireland in 2016 were people aged over 65: an updated – and integrated – National Pedestrian Safety Action Plan is urgently needed.

2.1.3 Actively promote and contribute to separated walking paths and cycling paths along roads to avoid conflict between road users and avoid potential for 'spillover' onto roads resulting from inadequate walking or cycling space. Age Action regularly hears concerns from many older people around walking on contested footpaths, with those cycling and running making them feel unsafe and worried about falling or being knocked over. This is particularly true for those with limited mobility or with a history of falls.

This need to establish separate walking paths is particularly urgent in the context of COVID-19 when the proportion of those taking exercise outside on these paths has risen dramatically. Without dedicated differentiated paths, this will act as a continued disincentive to exercise or remain mobile.

The current Strategy acknowledges the need for safe infrastructure to improve the attractiveness and safety of walking, however the actions in that strategy reflected only education of pedestrians and promotion of PPE. Age Action urges the inclusion of additional supports in the new Strategy such as collaboration with other agencies to set dedicated targets that meet established and adopted international age-friendly criteria.[17]

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[17] See Age Friendly Ireland (no date) *Being Age Friendly in the Public Realm Guidelines and Good Practice*. Available at https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-07/AF_PublicRealm_online-1.pdf.

It is particularly important to address methods to manage increasing conflicts between road users and road safety risks resulting from newer technologies such as e-scooters, e-bikes, e-skateboards. Particularly on shared paths, higher speed vehicles create risks for pedestrians and less accomplished cyclists, and lack of consistent guidelines for road use of these technologies across all local government areas increases the risks of confusion on roads and paths.[18]

2.1.4 Support accessibility of streets and crossings, particularly in light of the increase in these needs with an ageing population over the decade of the strategy. For example, through smooth curb-to-road transitions, updating of pedestrian crossings to respond to the needs of older pedestrians such as through using motion-sensitive 'penguin' crossings etc. Established guidelines on all of these items are available and in place from Age Friendly Ireland.

Priority 2: Promote safe driving for as long as possible, and support safe transitions for those that can no longer retain a licence

2.2.1 Balance mobility and safety by promoting programmes to educate and enable older people to drive as long as possible, to educate and enable older drivers to appropriately self-regulate their driving. Many positive initiatives are in place in the current Strategy around education and research via the National Programme Office for Traffic Medicine. It is crucial that the development of future programmes around this adopt a rights-based approach which involves those most affected in the design, implementation and review of activities.

2.2.2 Actively seek to promote regular reliable public transport access in both rural and urban areas in order to decrease the impact of loss of a private vehicle, and incentivise balanced decision making on the appropriate time to cease driving. We are pleased to see various commitments to this in the Programme for Government, including a clear recognition of the value of Local Link in the Programme for Government and to establish a Sustainable Rural Mobility Plan.

Priority 3: Adopt an integrated whole-of-government action on road safety

2.3.1 Establish meaningful whole-of-government planning and targets within the new Strategy for road safety issues that require integrated action.

- ***Set targets for agencies around*** :
  - The need for ***adequate pedestrian infrastructure*** in urban and rural contexts, given that in many cases the only place to walk is on the road, or paths remain too narrow to accommodate for example a wheelchair and a pedestrian heading in opposite directions. Adequate pedestrian

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[18] RSA (no date) *FAQs on eBikes, Pedelecs and Battery Scooters.* Available at:
https://www.rsa.ie/Documents/VS_Information_Notes/Two_Three_Wheeled_Vehicles/FAQs%20on%20E%20Bikes%20and%20Pedelecs%20and%20battery%20Scooters.pdf

infrastructure is also needed to ensure those with mobility scooters can remain on footpaths and not drive on the road.

- o The need for ***cycling infrastructure separated from both cars and pedestrians***, in order to both enable vulnerable older cyclists to safely be active (particularly where cyclists are not as fast or as predictable as other road users), and to ensure that older pedestrians remain safe where lack of cycle lanes might cause cyclists to leave particularly unsafe roads and use the footpath.

- ***Outline and clarify the connection of the new Strategy with other policies*** such as:

  - o The proposed ***Sustainable Rural Mobility Action Plan***, particularly the relationship between availability of public transport and the transition from driving should be articulated. As discussed above, the need for regular, reliable public transport, particularly in rural areas, is a key consideration in enabling people to retain their mobility and ease the process of giving up one's licence as soon as it becomes necessary.

  - o The new ***Busconnects*** approach involving 'spine' and 'orbital' routes, which may significantly increase the number of road crossings by pedestrians at interchanges between spine and orbital routes. Age Action has heard from many older people concerned about the particular risk for crossing roads due to issues such as slower walking speeds and less pedestrian acceleration capacity if unexpected vehicle movements occur.

  - o The proposed ***Sustainable Mobility Policy*** which is likely to affect road safety concerns particularly if the mode share of active transport such as walking and cycling (and e-cycling) is expected to increase.

Theme 3: Is there any part of the government's current Road Safety Strategy 2013– 2020 that we should consider when planning the government's next Road Safety Strategy?

Age Action urges the continued support for the National Programme Office for Traffic Medicine which produces vital research on older road users as well as to assist with the development of older road user awareness programmes and tools. The integration of a rights-based approach to the work of education and awareness tools will ensure the greater involvement of the most vulnerable road users and ensure greater message effectiveness.

We support the continued focus on vulnerable groups that are particularly prone to serious injury in the context of road collisions such as includes older people, pedestrians, cyclists.

Theme 5: Do you have any other comments?

5.1.1 Include a commitment in Road Safety Strategy to adopt a rights-based approach to policy development, including standardised data collection and the participation of people in the design, implementation and monitoring of decisions that affect their lives

To ensure greater effectiveness of messaging and supports, it is vital that the the new Strategy – and the RSA - prioritise the participation of older people in the development of the road safety strategy. As outlined earlier, those aged over 65 are disproportionately represented in pedestrian fatalities and are the focus of older road user awareness programmes under the 2013-2020 strategy.

Also discussed earlier, half of those aged over 65 are not digitally literate or confident and thus a reliance on online methods for feedback, communication and interaction will likely result in difficulties. Age Action was disappointed to see a reliance on online communication for the consultation process for the development of this new Strategy which has effectively prohibited many who are offline from being aware of - and inputting to - the new Strategy.

The development of a consultation strategy that adequately involves and reaches out to those that are offline will promote a more robust, participatory approach to policy development. This approach should be standard across all consultation, however, it is even more vital in relation to the road safety strategy where older people - less likely to be online - may also hold vital feedback on improving road safety and reducing disproportionate pedestrian fatalities in this age group.

Attention to a rights-based approach to service provision would also be supported by ensuring that all programmes and RSA services are just as easily accessed by those offline as those online. Recent actions as a result of the COVID-19 pandemic which limited some services to only those online – such as driver licence renewal – locked older people (the majority of whom are either not online or lack basic digital skills) out of RSA services. Age Action received many contacts from people unable to contact the RSA or find out information online regarding licence renewal and this indicates the potential for much greater attention to service and programme accessibility for all users in decision-making processes.

Age Action urges the new Strategy to commit to wider disaggregated age categories when collecting and publishing data on road safety to enable improved targeting of those most at risk as pedestrians, cyclists, or drivers. This would mean, for example, rather than a '65+' category, that data is given in 9-year age brackets across the age spectrum so the needs of each age group are equally represented and understood. This would match international good practice in data collection and offer a more nuanced picture of the state of play.

4. Conclusion

Adequate road safety planning plays a vital role in supporting older people to maintain independence in the communities.

A greater focus on pedestrian safety, supporting walking and cycling and promoting safe driving will improve road safety for older people in the decade to come. Further to this, the participation of older people in consultation, and a whole of Government approach to road safety planning for our ageing population, is needed to embed robust and integrated action.

About Age Action

Age Action is the leading advocacy organisation on ageing and older people in Ireland. Our mission is to achieve fundamental change in the lives of all older people by eliminating age discrimination, promoting positive ageing and securing their right to comprehensive and high-quality services.

Age Action supports and advocates for equality and human rights for all older people. Everything we do is based on a recognition of the diversity of identity and situation among older people and a concern for equality for all older people. In addressing ageing, our work includes a concern to influence perspectives on and responses to ageing. This pursuit of equality and human rights is underpinned by our work to promote ageing in place, life-long learning, and health and wellbeing for older people, empowering them to live as active citizens.