

<b>CITY OF WOLVERHAMPTON COUNCIL</b>	<b>Cabinet</b> <b>20 October 2021</b>
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<b>Report title</b>	Fleet Telematics Policy and System	
<b>Decision designation</b>	AMBER	
<b>Cabinet member with lead responsibility</b>	Councillor Steve Evans City Environment and Climate Change	
<b>Key decision</b>	No	
<b>In forward plan</b>	Yes	
<b>Wards affected</b>	All Wards	
<b>Accountable Director</b>	Ross Cook, Director of City Housing and Environment	
<b>Originating service</b>	Fleet Services	
<b>Accountable employee</b>	Oliver Thomas	Climate Change Project Manager
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<b>Report to be/has been considered by</b>	City Housing and Environment Leadership Team	31 August 2021
	Strategic Executive Board	7 October 2021

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### Recommendations for decision:

The Cabinet is recommended to:

1. Approve the telematics policy proposal to support the introduction of a telematics system.
2. Endorse the introduction of a telematics system to aid in fleet monitoring, driver behaviour, and the Council's climate change targets, subject to business case development.

### Recommendations for noting:

The Cabinet is asked to note that:

1. The report does not require approval for funding towards the telematics system. A business case will be developed in due course for subsequent budget approvals.

## **1.0 Purpose**

- 1.1 The purpose of this report is to seek approval to introduce a new fleet telematics tracker policy to support the transformation and electrification of the Council's Fleet Services.
- 1.2 Additionally, the report also seeks to outline plans to introduce a telematics system to be integrated into all fleet vehicles.

## **2.0 Background**

- 2.1 The City of Wolverhampton Council has a fleet of over 500 vehicles including hired vehicles and plant that are required in order to help deliver a diverse range of services.
  - 2.2 Drivers of fleet vehicles are subject to greatest on the job risk to their own wellbeing, and to the wellbeing of other road users, which has implications on the Council's insurance premiums.
  - 2.3 The implementation and operation of vehicle telematics system will support the Council in achieving its aim of providing a safe, efficient, and environmentally friendly modern fleet.
  - 2.4 Vehicle telematics systems are on-board multifunctional monitoring devices that are plugged into a vehicles on-board computer. The devices collect vehicle data that can be used to help improve the operational efficiency of the fleet, whilst also providing evidence on driver behaviour, and the behaviour of other road users pertaining to road traffic accidents.
  - 2.5 Unlike most modern fleets, the majority of Wolverhampton Council's fleet lacks a modern telematics system. Fleet services have identified a need to introduce one.
  - 2.6 The Council's Green Fleet Review conducted by Energy Savings Trust to support fleet electrification plans, recommended introducing a telematics system across all our fleet vehicles – no exceptions, a first step towards electrification, and thus a critical step in the Council Climate Change plans.
  - 2.7 Before a system could be deployed, however, it was advised to develop an overarching policy framework that sets the conditions and parameters of the proposed system and the utilisation of collected data.
  - 2.8 A fleet Telematics/tracker policy has been in development over the past two years. Subject to its approval, Fleet Services will begin to progress plans to procure and install a telematics system.
- ## **3.0 Progress, options, discussion, etc.**
- 3.1 A draft policy which underpins the system's legitimacy, was developed to outline the data usage requirement for the Council, to safeguard the drivers, protect the identify of customers and ensure that collection of the data does not breach data protection regulations (GDPR).

- 3.2 The proposal requires installation of a telematics device on all council corporate vehicles alongside vehicle cameras (dashboard cameras) to record a multitude of data such as:
- A. Vehicle usage (mileage, hours of use etc.)
  - B. Idle time (details of excessive idling times)
  - C. Speeding events (breaches of speed in all areas)
  - D. Harsh events including cornering, acceleration, braking (for focused training requirements)
  - E. Carbon emissions and fuel usage
  - F. Parking locations (operator licence fleet)
  - G. Maintenance alerts where applicable (taken from on board Engine Management CPU)
  - H. Other virtual geographic boundaries as requested
- 3.3 The system will collect some personal data, but the data will only be used for the purposes listed above, and any data used for disciplinary purposes within the council, will first have to adhere to the policy outline.
- 3.4 A full copy of the policy proposal is contained within Appendix 1.
- 3.5 The Policy has been reviewed and endorsed by the following stakeholders:
- A. Fleet Personnel
  - B. Human Resources
  - C. Information Governance
  - D. Transport Asset Group (TAG)
  - E. Trade Unions (Head of City Transport outlined the document to the TU, 23 Feb 21 and again 27 Apr 21 after making amendments)
- 3.6 Further endorsement through a second round review of the policy has been achieved from Human Resources, Information Governance, and the Trade Unions, with final endorsement by the unions on the 28 September 2021.
- 4.0 Evaluation of alternative options**
- 4.1 Option 1 – to make no changes to the existing policy. This would result in rejection of the proposed policy and an inability to implement the telematics system required, and the subsequent benefits to the Council.

4.2 Option 2 – fully endorse the proposed policy for incorporation into council corporate policy. This would enable development of the business case for implementation, and the introduction of a future system to support fleet transformation.

4.3 The recommended option is option 2

## **5.0 Reasons for decision(s)**

5.1 The policy will lay the foundation for the physical system, which in turn will:

- A. Support a move towards the Council's commitment to be net carbon zero by 2028.
- B. Provide additional protection to employees by assisting the management of occupational road risk to meet our health and safety responsibilities.
- C. Reduce carbon emissions and improve air quality.
- D. Support logistics planning and vehicle utilisation for effective service provision
- E. Reduce costs associated with the maintenance of vehicles
- F. Assist with the location of vehicles that have broken down or have been stolen.
- G. Record drivers' hours to evidence of compliance with the Road Transport Directive.
- H. Help safeguard employees against vexatious complaints and allegations.
- I. Assist in work planning (e.g. planning routes and schedules, reducing 'dead' mileage, knowing which vehicle is closest to an emergency, making best use of vehicles, etc.).
- J. Provide information on who is responsible for a vehicle at all times to help meet the requirements of the Goods Vehicle Operator's Licence
- K. Provide information on driver behaviour to improve safety.
- L. Assist in protecting the Council and its employees from claims arising from such incidents involving any Road Traffic Accidents (RTA)

5.2 In June 2022 the Council will be procuring an insurance provider. Progressing with the telematics system in the near term for delivery within the next six months, will have direct consequences on the Council's insurance premiums for the next five years.

## **6.0 Financial implications**

6.1 There are no direct financial implications from this policy paper. However, it must be noted that introduction of a telematics system would require capital and/or revenue investment, the costs of which are yet to be determined.

6.2 Introduction of a telematics system could produce savings for the local authority. According to the Energy Savings Trust Report, improved vehicle monitoring, and fuel management could realise fuel savings of between 5% and 15%. For context, a 5%

reduction in fuel use across our existing diesel refuse collection, heavy commercial and light commercial vehicles, would save £50,000 worth of diesel every year.

- 6.3 There are also potential revenue benefits for the Council's insurance premiums which are due for Renewal in June 2022. However, implications on insurance premiums are hard to quantify but may be negotiable through the procurement process depending on the system selected and the additional safety features included to hedge against risk.
- 6.4 The assumed cashable benefits from a telematics system require further exploration.
- 6.5 A full business case for a telematics system will be developed and brought for future approvals.

[SB/17082021/C]

## **7.0 Legal implications**

- 7.1 There are direct and indirect legal implications from the telematics policy.
- 7.2 Directly, the new policy outlines a requirement for data collection of fleet operators. As per the policy, the data should be recorded and stored in alignment with GDPR and our internal governance arrangements.
- 7.3 Failure to adhere to GDPR and the telematics policy, or if data is used inappropriately by the council, then the Council could be open to litigation.
- 7.4 Indirectly, the data collected by a telematics system could provide supporting evidence in favour of the council with regards to legal disputes, in particular where RTA claims are made against the Council.

[TC/01102021/B]

## **8.0 Equalities implications**

- 8.1 An equalities impact assessment was conducted 2 February 2021. The only item identified was that if telematics was used to support fleet consolidation, it should not negatively or disproportionately impact disabled drivers.

## **9.0 All other implications**

### **Information Governance Implications**

- 9.1 Some of the information recorded by the vehicle technology and telematics equipment is considered to be personal data under General Data Protection Regulation (GDPR) as it allows anyone accessing the system to identify an individual driver and their behaviour.
- 9.2 Different user profiles could be built into the system to enable levelled access according to their user level and their needs to access the system, such as those with standard monitoring duties, or line managers etc.
- 9.3 All data will be processed in accordance with GDPR.

- 9.4 The use of the vehicle telematics system, its functionality, and the information it holds, must be proportionate, transparent, and reasonable. Driver data on the operation of a specific vehicle will only be used for the purposes listed in 3.3 above.
- 9.5 The data recorded by the vehicle telematics system will be managed in line with the Council's governance policies and procedures, to help provide management information about vehicle use for insurance claims, legal proceedings and if necessary, resolve any complaints or allegations made against the Council or its employees.
- 9.6 Advice for accessing information can be sought through Information Governance, but the Head of City Transport will be responsible for approving or rejecting any requests to access information.
- 9.7 Two clarifications were provided by Information Governance that have since been incorporated into the policy, that:
- A. full Information Governance impact assessment will be carried out upon procurement of the telematics system to outline any risks and identify subsequent mitigations.
  - B. It be made clearer within the policy that the vehicle tracking, and monitoring would do so inside and outside of work hours to monitor unauthorised usage.
- 9.8 These changes have been made and noted for the remainder of the project.
- 9.9 A guidance note will be developed upon implementation to ensure that all affected parties are able to utilise the policy effectively.
- 9.10 Any changes to the policy will require approval by the working group which is detailed within appendix 1 of the policy protocols.

### **Human Resources Implications**

- 9.11 The policy itself has direct implications on Human Resources in that it outlines the need to capture data and information relating to employee activities, with regards to driver behaviour.
- 9.12 The data can, if required and justified, be used for incident investigations and to monitor fleet usage.
- 9.13 The implication of data collection and usage are included within the policy, and the requirements for access to data are outlined
- 9.14 The Trade Unions have been engaged for comment and for input into the policy to ensure that employee safeguarding is protected.
- 9.15 The policy includes explanation that any data used for these purposes should be requested and justified through the data application process. The use of the data has been covered with the policy protocols and principles.

- 9.16 Formalisation of a new policy and inclusion on corporate systems will be carried out by Human Resources, in line with existing policies and procedures.
- 9.17 Any future changes to the policy will be done so in accordance with the procedures outlined within appendix 1 of the telematics policy via the establishment of the telematics policy working group, which will include all relevant internal parties and ensured representation from the Trade Unions.

### **Health and safety Implications**

- 9.18 Introduction of the policy will have no bearing on health and safety; however, the telematics system will have significant benefits for a health and safety at work, through monitoring of vehicle and driver behaviour and introduction of driver performance targets.

### **Climate Change Implications**

- 9.19 The Telematics policy will have no direct bearing on the Council's climate change targets. However, introduction of a telematics system will be critical for fleet monitoring and the ongoing transformation programme towards electric fleet vehicles.
- 9.20 Improved driver behaviour has the potential to improve vehicle fuel economy, saving energy and carbon emissions.
- 9.21 As per the Energy saving trust Green Fleet Report, improved fuel management from improved driver behaviour could reduce fuel consumption by 5 – 15%. A 5 % reduction in fuel use would produce 117 tonnes of CO2 savings every year.

## **10.0 Schedule of background papers**

- 10.1 02.02.2021 - Signed Equalities impact Assessment for Fleet Telematics System

## **11.0 Appendices**

- 11.1 Appendix 1: Telematics/Tracker Policy