Fleet Telematics Policy

Using Vehicle Tacking and Driver Behavior Data.

Created:

Revised:

1.0 The Aim of the Policy

1.1 City of Wolverhampton Council has a fleet of over 500 vehicles including hired vehicles and plant that are required to help deliver a diverse range of services.

1.2 It is recognised that driving is one of the most hazardous work activities undertaken by employees and contributes to carbon emissions and a reduction in air quality. This policy will support the Councils commitment to be net carbon zero by 2028 having declared a Climate Emergency.

1.3 The implementation and operation of vehicle technology and telematics systems will support the Council in achieving its aim of providing a safe, efficient and environmentally friendly fleet.

1.1 This policy sets out the general principles for the use of technology and telematics equipment in vehicles operated by City of Wolverhampton Council.

1.4 This policy should be read in conjunction with Appendix 1 the Vehicle Telematics and Technology Protocols.

2.0 Definitions

2.1 Vehicle technology and telematics are defined as systems employed within Council vehicles to measure and record data and information relating to the use of vehicles and service provision and include:

A. Vehicle telematics

B. In cab technology

C. Vehicle cameras (No inward facing cameras are planned for this policy)

3.0 Scope

3.1 This policy applies to:

D. All fleet vehicles operated by the council, council owned or hired

E. All employees and others who operate and/or drive fleet vehicles operated by the council.

3.2 The policy does not apply to employees who use their own vehicles on council business.

4.0 Roles and Responsibilities

4.1 In addition to general roles and responsibilities set out in City of Wolverhampton Council's Health and Safety Driving at Work Policy and Procedure and other relevant employment policies, the following specific roles and responsibilities are defined:

F. **The Fleet Manager** will be responsible for the selection, procurement, installation, maintenance, monitoring of vehicle telematics and provision of training for employees. They will also be responsible for managing information generated by the telematics in accordance with UK Data Protection laws (General Data Protection Regulation 2016/679, Data Protection Act 2018) GDPR UK.

G. **The Health and Safety Lead** is responsible for providing advice and guidance in terms of the operation and use of the equipment and information generated, as it relates to health, safety, and wellbeing.

H. **Line Managers** at all levels are responsible for ensuring that employees who operate and/or drive fleet vehicles understand how to operate the equipment, if required and how the information generated will be used. Line Managers are also responsible for ensuring that these employees comply with this policy and activate the equipment prior to driving a fleet vehicle.

I. **Employees** are responsible for ensuring that they comply with this policy and utilise the equipment provided appropriately.

5.0   Principles

5.1   The Council will use vehicle technology and telematics devices and the information that they provide for the purposes of:

J. Providing additional protection to employees by assisting the management of occupational road risk to meet our health and safety responsibilities

K. Reducing carbon emissions and improving air quality

L. Helping to plan the logistics and vehicle utilisation for the provision of effective services

M. Reducing costs associated with the maintenance of vehicles

N. Assisting with the location of vehicles that have broken down or have been stolen

O. Recording drivers' hours to provide evidence of compliance with the Road Transport Directive

P. Helping to safeguard employees against vexatious complaints and allegations

Q. Assisting 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.)

R. Providing information on who is responsible for a vehicle at all times to help meet the requirements of the Goods Vehicle Operator's License

S. Providing information on driver behaviour to improve safety.

T. In circumstances involving any Road Traffic Accidents (RTA) this information will also assist in protecting the Council and its employees from claims arising from such incidents.

5.2   If any poor practice or misconduct is observed through analysis of the system an employee will be made aware of any concerns the use of technology and telematics has identified and be provided with an opportunity to express their viewpoint before any decision as to further action are reached and will follow HR Performance Management and/or Disciplinary guidelines. *(see appendix 1)*

6.0   Maintenance, Storage, Handling and Access to Records

6.1   Some of the information recorded by the vehicle technology and telematics equipment is considered to be personal data under GDPR as it allows anyone accessing the system to identify an individual driver and their behaviour.

1.2   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 5.1 above.

6.2   Personal data must be processed in accordance with GDPR.

6.3   The data recorded by the vehicle telematics system will be managed in line with the Council's governance policies and procedures in particular the Records Management Policy and the Records Retention and Disposal Policy, 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.

6.4   The Head of City Transport and/or the Fleet Manager will be responsible for approving or rejecting requests to access this information when a complaint has been made or a serious incident has occurred and there is a need to investigate. Prior to approving or rejecting a request advice may be sought from Information Governance.

6.5   General information and trends can be monitored and reported on to inform strategies to reduce carbon emissions, improve air quality and help to reduce occupational road risk.

6.6   Typical data that will be recorded by the system will include, but is not limited to:

A. Vehicle position and location

B. Vehicle speed

C. Harsh vehicle acceleration

D. Harsh vehicle braking

E. Engine idling time

F. Harsh cornering

6.7 The data can be requested at any time, but it cannot be viewed until written consent has been given as set out in 6.5 above.

7.0 Use of Records

7.1 If the data has been reviewed in accordance with 6.4 above, an employee will be made aware of any concerns the use of technology and telematics has identified and be provided with an opportunity to express their viewpoint before any decision as to further action are reached, and will follow HR Performance Management and/or Disciplinary guidelines.

8.0 Implementation and Review of the Policy

8.1 The Policy will undergo consultation with the Trade Unions for its development.

8.2 This Policy is operational from the date of approval and replaces any previous policies, procedures and/or local agreements.

8.3 Any future review or revision will be undertaken in consultation with the Trade Unions.

9.0 Appendix 1 Vehicle Telematics and Technology Protocols

Introduction

This document is an appendix to the Council's Corporate Vehicle Tracker Policy. These protocols are designed to set out a series of rules and guidelines to ensure the system is used to maximum benefit for the Council and is not misused to the detriment of its workforce.

As part of the roll out of a Corporate Telematics system, a working group shall (initially) meet on a bi-monthly basis to review working practices, the suitability of the protocols, any required updates and dissemination of information regarding any changes to service areas. This working group will (as a minimum) comprise of:

- Procurement

- Fleet Services

- Trade Unions

- Driver Representatives

- Telematics Supplier representative (when required)

Index:

- **GDPR**

- **Roles and Responsibilities**

- **Monitoring**

- **Appendix 2 - Application for driver data**

Appendices 1 Vehicle Telematics and Technology Protocols

GDPR

For further information in respect of Data Protection and Privacy please see the Council's Data Protection policy and Privacy Statement.

The following paragraphs set out how the Council intends to use information recorded by Telematics systems, ensuring compliance with the principles above.

Information recorded by the vehicle tracking system is considered to be personal data because it allows persons accessing the system to identify an individual, the driver and their behaviour.

Therefore, the use of the vehicle tracking system, its functionality, and the information it holds, must be proportionate, transparent, and reasonable.

The council acknowledges that while the system does collect and identify personal data, that collection of personal data is covered by UK Data Protection laws (General Data Protection Regulation 2016/679, Data Protection Act 2018).

A full information governance impact assessment will be carried out prior to implementation of the telematics system to identify any potential information risks, and mitigations.

The system will be used to:

- Record drivers' hours for the road transport directive and provide written evidence of both duty and driving time.

- Provide evidence of actual service delivery and secure continued confidence in the delivery of important and valued front line services, enabled by having a quality controlled and managed fleet.

- Improve security and the health and safety of the workforce, particularly lone workers.

- Protect council assets through the monitoring of authorised and unauthorised use of vehicles

The data recorded by the vehicle tracking system will be managed in line with City of Wolverhampton Council's Governance policies and procedures in particular the Records Management Policy and the Records Retention and Disposal Policy, 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.

Appendix 1 Vehicle Telematics and Technology Protocols

The system fitted to all CWC fleet provides accurate data on the following areas as a minimum:

- Vehicle utilisation (details of underutilised fleet for example, where a service area has a number of vehicles with very low mileage or infrequent use, the system can be used to inform the service on how to maximise the use of these resources or, share the resource across services) and will form part of the fleet logistics support within relevant service areas.

- Vehicle usage (mileage, hours of use, out of hours use, unauthorised use,etc.)

- Idle time (details of excessive idling times)

- Speeding events (breaches of speed in all areas)

- Harsh events including cornering, acceleration, braking (for focused training requirements)

- Carbon emissions and fuel usage

- Parking locations (operator license fleet)

- Maintenance alerts where applicable (taken from on board Engine Management CPU)

- Other virtual geographic boundaries as requested

Roles and Responsibilities

Telematics can provide a suite of reporting information starting at a holistic fleet level, right through to individual driver statistics.

The system Provider will issue reports to Fleet Services and to those who require access to the information and to the relevant Service managers. The data shall be analysed for any trends or anomalies prior to it being shared with TAG (Transport Asset Group).

Telematic reports will be customised to produce data relevant to each particular section.

Where vehicle maintenance information is available this will be used to arrange repair/maintenance works by Fleet Services.

Appendix 1 Vehicle Telematics and Technology Protocols

Service Managers shall have responsibility for using the data contained in the reports to maximise the use and efficiency of their fleet and driver behaviour standards.

Should such analysis identify areas of good practice then individual drivers will be notified and their good performance will be acknowledged. (Examples of good practice to be documented, could include reduced speeding events or increased MPG over a sustained period of time).

Transport Asset Group working with Fleet Management, shall have responsibility for recommending any changes to the fleet based on their analysis of the data, such as cross-departmental sharing of assets and fleet rationalisation.

Access levels shall range from view only to access all areas. Employees accessing the system shall be allocated a user profile. These user profiles shall have different levels of access according to their need to access the system.

The different user profiles shall be developed with the Provider of the system. User profile categorisation could be set out as follows:

System administrators
Fleet Services [named officers yet to be determined] – shall have full access to all areas of the system.

Managers
Service Managers will have relevant access to driver data, vehicle information and basic tracking information and reports. Relevant in this context means specific to the teams they directly manage.

Operational employees
Operational employees (such as Supervisors, Team leaders, Fleet Admin etc.) will have access to amend/change back-office system parameters as appropriate.

Drivers
To assess their own performance drivers can ask for reports and information from their manager or team leader.

Access
Pre-requisites for having access to the system will be that the telematics system will be accessed with proper intent and used for the purposes described above only.

Release of Telematics data
Anybody requiring data from the Telematics system that they are unable to access by logging in (due to their user profile access restrictions) must fill out a formal, written request using the data information release form (Appendix 2). The request for information shall be reviewed by the Head of City Transport or the Director or Deputy Director of City Environment in their absence. Information shall only be released where there is a clear and justifiable reason for doing so.

Monitoring

The Council will monitor its fleet to:

1) Analyse vehicle movements to maximise vehicle utilisation, service delivery and enhance efficiency.

2) Evidence that our vehicles operate within the speed limits and comply fully with statutory requirements, including but not exclusively:

   a) Operator's License,
   b) Construction and Use,
   c) Driving License and Driver's Hours regulations and legislation covered by Road Traffic Act 1991,
   d) Goods Vehicle (Licensing of Operators) Act 1995,
   e) The Community Drivers' Hours and Recording Equipment Regulations 2007,
   f) The Motor Vehicles (Driving Licenses) (Amendment) (No.3) Regulations 2004
   g) The Road Vehicles (Construction and Use) (Amendment) (No.4) Regulations 2003.

3) In circumstances involving any Road Traffic Accidents (RTA) this information will also assist in protecting the Council and its employees from claims arising from such incidents.

   a) Help support the police and insurers in tracing any stolen vehicles and recovering those assets.
   b) Monitoring of the data regarding fuel consumption and related emissions through the vehicle management system which will help with the collection of data and reporting of fuel consumption with regard to CO_2 and NOX emissions.

4) Monitor of Driver Behavior to reduce the fuel consumption and costs which will further improve our efficiency of service delivery and protect Council jobs/services

5) Respond with absolute confidence to customer enquiries and complaints on driver related issues.

6) Provide management and supervisors with vehicle location information to manage its fleet.

7) Provide additional systems to support lone working and driver safety.

8) Use the reports generated to manage driver training objectives and reduce road risk to drivers and members of the public.

If any poor practice or misconduct is observed through analysis of the system:

1) In the first instance such intelligence will be shared with the appropriate individual in the service area in order to ascertain the reasons for any variation in driver behaviour standards.

2) Where driver behaviour issues are identified, these will be raised informally with drivers in the first instance with a view to resolving the issues through training (such as driver assessment) or mentoring, without any further escalation.

3) The driver shall be given a reasonable period in which to address the driver behaviour issue that is proportionate to the severity of the issue. Fleet Services can provide advice as to what might be appropriate in this regard. If improvement is not made in line with agreed timescales performance could be addressed through application of the capability procedure. If the driver is responsible of misconduct, then action through the disciplinary procedure could be pursued.

4) This agreement will be recorded (copy to 1:2:1) as a written (electronic) record so there can be no ambiguity about what was agreed. This written record shall be shared with Fleet Services and will remain on file in line with existing Council policies and procedures.

5) If driver behaviour does not improve in line with the agreement, or, the issue was of a serious nature (for example, where the driving has presented a serious risk to the Health and Safety of others, or, where there is a clear breach of the Council's conduct policy) then the service may investigate this issue further and where appropriate, the Council's disciplinary procedures may be used.

6) No action will be taken against any employee until a proper and thorough investigation has taken place and the employee given the opportunity to explain his/her actions.

7) Requests for information in support of any disciplinary procedure will have to be requested through fleet services on the "Application for driver data form" by the nominated investigating officer appointed by HR.

8) The information data for any disciplinary investigation shall only be made available where the driver's behaviour has been raised informally with the employee and there had not been improvement, or where the driver behaviour is of a serious nature.

10.0 Appendix 2 Application form for driver data / report

Application Unique Reference Number

Manager request ☐   Human Resources request ☐

Operative request ☐   HR appointed Investigation Officer request ☐

Name

Date

Request Details:

Date and Time in scope

Telematics fob ref

Reason for request:

- -
Submission to be forwarded to Head of City Transport for Approval / Access declined

Head of City Transport:

Name   Application Approved ☐

Date   Application Declined ☐

Reason for refusal (if applicable)

- -
Submission to be forwarded to Director or Deputy Director in the absence of Head of City Transport for Approval / Access declined

Director / Deputy Director:

Name   Application Approved ☐

Date   Application Declined ☐

Reason for refusal (if applicable)