

## Vehicle Telematics and Handheld Devices Guidance for Staff

This Guidance can be made available in other languages and formats such as large print and audio on [request](#).

For further information or queries please speak to your manager or supervisor in the first instance. Specific queries may need to be escalated to the Fleet team or Parking Services Team (for handheld devices).

Policies, procedures and information relating to driving at work can be found on the [Corporate driving at work page on the EPIC Hub](#). Information on driver correction training can be found in the [corporate driving at work policy](#).

### Introduction

This Guidance explains the council's approach to the use of vehicle telematics and the Global Positioning (GPS) technology in council used handheld devices. It aims to increase awareness and understanding by explaining its purpose and how information is stored and can be used.

### Scope and General Principles

1. This Guidance applies to all Wiltshire Council employees, including centrally employed teachers. Maintained schools and academies have their own policies.
2. All agency staff, contractors and volunteers must also be made aware of and familiarise themselves with this information, where appropriate. Whilst they are not an 'employee' they should be aware where telematics is used, and that information may be shared with their employer or passed to the police or other third party where there is a lawful reason or legal obligation to do so e.g., should a potential conduct or criminal matter arise.
3. Managers should ensure teams are aware where telematic devices are in operation – especially where the team does not have ready access to HR Direct. They should also positively encourage and support staff when utilising data as a management tool e.g. promoting good driving practices.
4. Managers should deal promptly with any issues which arise through the use of these technologies.
5. Employees who are authorised to access data should ensure it is only disclosed through the correct disclosure process.
6. Employees must not tamper with, remove or disengage any device. Such action may result in disciplinary action.

## Vehicle Telematics

### Use

7. The vast majority of council owned vehicles are fitted with telematic devices, including pool cars and vehicles across many services including, the waste team, parking services, highways, housing, the tanker service, and passenger transport (hire cars may sometimes have telematics installed and these will be council devices). These devices will be installed across the whole council fleet over time. Signage is displayed where these are fitted. The in-cab unit is a small black box with a keypad to allow drivers to log in with their unique driver identification number.
8. This technology captures:
  - Vehicle location and status;
  - Distance travelled;
  - Speed;
  - Routes taken;
  - Instances of hard breaking/cornering/acceleration;
  - Engine idling;
  - Fuel consumption;
  - CO2 emissions.

This list may be expanded or amended over time.

9. When new methods and/or use of information are introduced all affected staff will be informed, ensuring that they have information about the purpose of the monitoring and how the data will be used.

### Purpose

10. Our vehicles are a major asset costing hundreds of thousands of pounds to maintain, insure and run.
11. Telematic devices are there primarily to enable the council to manage its vehicles for the purposes of lessening their environmental impact, improving operational practices and service delivery in terms of cost, efficiency and effectiveness.
12. Ways in which the data helps as a management tool include:
  - redesigning routes to ensure vehicles are fully utilised during the working day;
  - protecting the council against theft and fraudulent damage claims;
  - reporting on CO2 and financial savings;
  - identifying vehicle faults;
  - improving driver & vehicle security;
  - raising driver awareness.

13. In supporting these aims the technology helps improve driver behaviour and driver efficiency which will, for example, help reduce the level of fuel usage and lower carbon emissions. It can also help to prevent accidents.
14. The council expects staff to maintain the highest standards of behaviour while on council business, as detailed in the [Code of Conduct](#). As a performance and information tool, telematics devices can identify driver training needs and advise the driver on correct driving practices and behaviour, through the in-car audio systems. Drivers receive real time system feedback on their driving via audio and visual dashboard alerts. Therefore, data reports from the system will only show what has already been identified to the driver.
15. Where there are continued concerns and issues over an employee's driving habits, the employee can be requested to attend a driver corrective training course. In serious cases or where required improvements are not forthcoming, this may lead to disciplinary action under the council's procedure. However, it is expected that most issues should be resolved informally.

### **Collection and storage of data**

16. The device is usually located on the vehicle dashboard and data is constantly recording during every journey. It is activated when the vehicle is switched on and deactivated when the ignition is switched off.
17. Data is pseudonymised, meaning it is captured by way of a unique, numerical driver ID code. While individuals are not routinely identified, they can be when it is justified to do so (e.g. where suspect activity/inactivity is identified, there is suspicion of criminal activity or driving data identifies concerns). System access is limited to authorised users within Fleet Services.
18. The council will hold and have the right to use the data collected for two years from the date of collection. It will also be kept and referred to for as long as is necessary if it is being used as evidence, for example, in a disciplinary case or police investigation.
19. Wiltshire Council processes personal data in regard to this technology in accordance with the General Data Protection Regulations (GDPR).

### **Monitoring and reporting**

The Fleet team is responsible for data monitoring. Reports may be sent to managers outside of Fleet, subject to necessity and justifiable reasoning, e.g., if a combination of events resulted in a poor driver score, or if monitoring highlighted suspicious activity.

### **Evidence from Vehicle Devices**

20. Vehicle data will be used for the purpose which monitoring is being carried out for, unless the data reveals activity which no employer could reasonably be expected to ignore. For example, if there is a reasonable belief that there are unusual patterns of activity/non-activity, the data may be used to investigate the reason for this.
21. It will identify where good practice and standards are being met. It will also be used to deal with concerns or issues relating to driving behaviours. Employees should be reassured that the intention is to raise awareness and support improvement of driving practices. As such it is expected that matters would usually be dealt with through informal discussions between line managers and employees initially, without recourse to the disciplinary procedure.
22. In disciplinary cases, data gained from telematics may be produced as evidence. This can include cases which are not linked to driving behaviours but where there is a legitimate and justified reason for its use e.g. suspected fraudulent mileage claims. Use of data will only be considered as evidence following manager consultation with the appropriate HR case adviser, in order to establish whether it is justified as an essential part of the process.
23. Where data reporting retrieval is required by others outside of Fleet, requests must be made via Fleet using the appropriate form [\[link\]](#).
24. Where there is evidence of criminal activity, data may be provided to the police or other enforcement agencies, if requested. Any such disclosure would be made by written application through normal Information Governance processes.

### **Handheld devices**

25. There are some handheld devices, as used by civil enforcement officers for example, that record data about the users' location. However, their primary purpose will be business/task related, such as the issuing of penalty notices (PCNs) or providing information to deal with complaints/queries (e.g., challenges to PCNs). Access to recorded data is limited to supervisors and managers, and the Parking Appeals team, and the data is required to be held for 7 years.
26. Data may also be used as a management tool for operational efficiencies – such as effective patrol planning, locating missing devices and supporting employee health and safety.
27. Data will be used for the purpose it is being collected for, unless the data reveals activity which no employer could reasonably be expected to ignore. For example, if there is a reasonable belief that there are unusual

patterns of activity / non-activity or there is suspected falsifying of data, the data may be used to investigate the reason for this.

28. In disciplinary cases, data gained from telematics may be produced as evidence. Use of data will only be considered as evidence following manager consultation with the appropriate HR case adviser, in order to establish whether it is justified as an essential part of the process.

29. Where there is evidence of criminal activity, data may be provided to the police or other enforcement agencies, if requested. Any such disclosure would be made by written application through normal Information Governance processes.

### **Legislation**

- UK GDPR, DPA 2018
- Human Rights Act 1998
- Regulation of Investigatory Powers Act (RIPA) 2000