

VEHICLE TRACKING POLICY



**MARSHALL
CONSTRUCTION**

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1. Introduction

Vehicle tracking technologies have been installed in some company fleet vehicles for the purpose of improving efficiency and service delivery to our customers and demonstrating a reasonable attitude to the management of assets and resources.

This Policy sets out specifically how the tracking information shall be used.

It applies to vehicle tracking systems the company currently uses and also vehicle tracking systems that the company may implement and use in the future.

A Data Protection Impact Assessment must be undertaken by any manager that uses a vehicle tracking system. The company's HR department will assist with this if required.

2. Use of Tracking Information

The company shall use tracking information in the following circumstances:

- To locate employees in the event of an emergency, ensuring management knows the exact location of any vehicle at any given time, or to satisfy other health and safety concerns, for example, monitoring the safety of its lone workers.
- To track stolen vehicles.
- Under Section 172 of the Road Traffic Act 1988, the company has a duty to provide information that leads to the identification of a driver who has allegedly committed a road traffic offence.
- To establish the most effective working patterns and routes.
- To assist in intelligent routing in response to complaints/reports of fly-tipping.
- To investigate and respond to complaints received by individuals in relation to misconduct, inappropriate behaviour or incidents resulting in damage to third-party property, insurance claims, etc.
- To be used as a fleet management tool to monitor fleet utilisation, driver behaviours (in support of road safety) and environmental factors, such as air quality and excessive fuel consumption.
- As evidence to be considered as part of an investigation into management concerns about possible employee misconduct It shall be used in the following circumstances, for example:
 - inappropriate use of a company vehicle for personal reasons

- excessive breaks
- monitor working hours to verify hours claimed on timesheets

This list is non-exhaustive.

Tracking information shall NOT BE USED AS A SOLE SOURCE OF EVIDENCE FOR DISCIPLINARY ACTION.

Where concerns are raised about an employee's working practice, a manager shall request the information for consideration as part of the investigation.

3. Data Protection Implications

Under the provisions of Data Protection legislation, and the company's Data Protection Policy, the company and its employees have a responsibility to make sure that any personal data collected from the vehicle tracking system is done so in line with the requirements of the Act.

The information collected from the vehicle tracking system constitutes personal data because the information relates to an identified or identifiable individual. Only relevant supervisory staff shall have access to vehicle tracking information, including the location of the vehicle, start and finish time or route taken, and driving characteristics (speed, braking, etc). These relevant supervisory staff are responsible for complying with any security and control procedures covering access, use or protection of personal data.

All employees have the right to request access to tracking information relating to their activities whilst at work. If such a request is received, management should forward the request to the company's HR Department, who shall log the request and send the relevant report to the employee. An employee disagreeing with the information contained in the report can request that the information is rectified, provided that they can provide evidence to substantiate the change. If the employee is not able to provide evidence to substantiate the change, the employee may request that a note be placed on the record, stating that the information within the record is disputed. The company shall make sure that personal data is stored in a secure, confidential manner and access is limited only to certain managers. Vehicle tracking information shall be held on a secure server where access shall be strictly through a password-controlled connection.

Personal data shall be kept for a maximum of 24 months, as the company may be audited by the HMRC over that period for VAT on business mileage. The personal data collected may be shared with other departments in the company, for the purposes of preventing fraud, misuse of company funds, and any legal or statutory requirements.

4. Awareness of policy

All employees shall be made aware of this policy by its promulgation on Office and Site Notice boards. New start employees will be given a copy of this policy upon joining the company, along with their contract of employment. Existing employees will be given yearly reminders of the policy via an email reminder to All Staff.

5. Disciplinary Action

Deliberate damage to the tracking hardware shall be dealt with in accordance with the company's Disciplinary and Grievance Procedure. Any employee found accessing, distributing, sharing or misusing any personal data collected for the purposes of vehicle tracking without lawful authority shall be dealt with in accordance with the company's Disciplinary and Grievance Procedure.



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