

Vehicle Tracking Policy

1. Introduction

- 1.1. Global Positioning System (GPS) is a technology that receives location information about a vehicle. A telematics device records further behavioural information, such as speed and distance travelled, to build a greater understanding of how a vehicle is being used.
- 1.2. The purpose of this policy is to increase awareness and understanding of the organisation's use of GPS and telematics devices in its vehicles.
- 1.3. It also aims to clarify the rules and procedures in place and explain how the organisation uses this data.
- 1.4. The organisation aims for full transparency regarding its use of tracking devices. Any further queries about vehicle tracking should be directed at SHAL's CEO.

2. Use of tracking technology

- 2.1. A GPS and telematics device is installed in all of the organisation's vehicles. The tracking device will be in constant use/will be used during business hours, with a privacy button installed to ensure privacy when in personal use.
- 2.2. The type of technology used by the organisation captures:
 - 2.2.1. vehicle location
 - 2.2.2. speed
 - 2.2.3. routes taken
 - 2.2.4. distance covered
 - 2.2.5. time spent driving
 - 2.2.6. instances of hard breaking
 - 2.2.7. idle time.
 - 2.2.8. This list may be expanded in the future.
- 2.3. The organisation collects this data to:
 - 2.3.1. ensure legal compliance

- 2.3.2. optimise operational efficiencies
- 2.3.3. reduce the risk of theft
- 2.3.4. help prevent accidents
- 2.3.5. comply with insurance requirements
- 2.3.6. ensure compliance with the Working Time Regulations 1998
- 2.3.7. improve customer experience
- 2.3.8. enhance performance and productivity
- 2.4. Employees are responsible for ensuring that the telematics device is not damaged and for reporting any concerns to their line manager.
- 2.5. Employees found to have tampered with the organisation's vehicle tracking devices will face disciplinary proceedings.
- 2.6. Any employee found to have breached this policy will be notified as soon as possible and given the opportunity to respond to any allegations in line with the organisation's disciplinary procedure.

3. Collection and storage

- 3.1. Data is collected and stored in line with the UK General Data Protection Regulation and will not be shared with third parties, except for insurance reasons or other legitimate business purposes.
- 3.2. The device sits under the dashboard panels in each of the organisation's vehicles and data will be consistently recorded and checked daily or when necessary. Data will be kept only for insurance reasons or other legitimate business purposes, including to assess key long-term efficiency of delivery times.
- 3.3. It may also be necessary to retain data if it is being used as evidence in disciplinary proceedings.
- 3.4. In the event that the police request information on an employee for the purposes of the prevention or detection of crime or the apprehension or prosecution of offenders, the organisation is required to supply it.
- 3.5. Employees have the right to make a subject access request if they wish to gain access to data stored in relation to them.

4. Impact assessment

- 4.1. The organisation has carried out a data protection impact assessment to determine the necessity and proportionality of tracking its vehicles and to reduce the risk of breaching employees' privacy.

5. Owner

5.1. Maintenance Manager

6. Version and Revisions

6.1. This policy will be reviewed every 3 year(s)

6.2. Revisions

New version	Date	Revision details