

Vehicle Tracking Policy & Procedure (F-032)

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Name of approving body:	EMT
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Minor amendments made prior to full review date above (see appended document control sheet for details)

Date approved by Lead Director:

Date EMT as approving body notified for information:

Policies should be accessed via the Trust intranet to ensure the current version is used

Contents

1. INTRODUCTION.....	3
2. SCOPE	3
3. DUTIES AND RESPONSIBILITIES.....	3
4. HOW GPS VEHICLE TRACKING WORKS	4
5. BENEFITS OF A GPS VEHICLE TRACKING SYSTEM	4
6. USE OF TRACKING INFORMATION	4
7. DATA THAT CAN BE GATHERED FROM A GPS VEHICLE TRACKING SYSTEM	5
8. EMPLOYEE GUIDANCE	5
9. PROCESS FOR ACCESSING DATA FROM THE VEHICLE TRACKING SYSTEM	6
10. BREACH OF VEHICLE TRACKING POLICY	6
11. MONITORING AND AUDIT	7
APPENDIX 1 – DOCUMENT CONTROL SHEET	8
APPENDIX 2 - EQUALITY IMPACT ASSESSMENT (EIA).....	9

1. INTRODUCTION

Vehicle tracking devices using GPS (Global Positioning System) are commonplace within transport operations, which facilitate, operational efficiencies, safety, and security benefits for organisations. This Policy sets out specifically how the tracking information shall be used. It applies to all vehicle tracking systems that the Trust uses and vehicle tracking systems that the Trust may deploy, implement, and monitor in the future.

2. SCOPE

This policy applies to all employees working at all levels and grades within Humber Teaching NHS Foundation Trust who have access to and are required to drive/operate any Humber Teaching NHS Foundation Trust vehicle that has a tracking device fitted.

The following departmental vehicles have trackers fitted.

- Estates
- Hotel Services
- Emergency Planning

Should other Trust fleet vehicles have trackers installed, this policy will be updated.

3. DUTIES AND RESPONSIBILITIES

Chief Executive

The chief executive is required to ensure the organisation has systems and processes in place to implement this policy.

Senior Management

Managers are responsible to their director for the implementation of this policy and to ensure that the arrangements in this policy are communicated to their teams and are in place.

Line Managers

- Bring this policy to the attention of their staff who drive on Trust business in a vehicle that utilises a tracking device.
- Ensure driving at work activities are included in Unit/Team risk management systems.
- Ensure that regular checks are carried out on Trust owned/leased vehicles where applicable. • Ensure that staff are referred to Occupational Health for advice on fitness to work if they have reported a medical issue which may affect their ability to drive at work or the manager requires advice on staff members fitness to drive at work.
- Ensure any safety related driving at work incidents are reported through the Datix reporting procedure.

Trust Staff

Staff who drive on Trust business must:

- Hold a valid driving licence which meets the requirements of the Motor Vehicles (Driving Licences) Regulations 1999.
- Always comply with the requirements of the Highway Code. Humber Teaching NHS Foundation Trust Driving at Work Policy Version 2.02, August 2021 Page 4 of 12
- Drive a vehicle which is road worthy and meets the requirements of the Road Traffic Act 1988.

4. HOW GPS VEHICLE TRACKING WORKS

Vehicle tracking systems were originally used for military purposes and rely on satellite technology. Initially the information provided was restricted to location and speed and direction of travel which was transmitted from a tracking device fitted in the vehicle to a computer via the satellite. However, this has now developed over time and far more sophisticated information is now available. In certain applications this records how the vehicle is being used and driven. Such information is picked up from the vehicle's engine management system. This data is formatted and can be stored for potential later use or viewed in real time using a computer application. The information is highly accurate.

5. BENEFITS OF A GPS VEHICLE TRACKING SYSTEM

Using GPS aims to provide the following benefits:

- Safety and legal compliance – to increase driver safety and security, through safer and compliant driving as well as helping ensure the safety and consideration for other road users.
- Operational efficiencies – to provide data that supports operational improvements e.g., start and finish times.
- Vehicle cost efficiencies – to reduce maintenance costs, reduce the frequency of accidents and other costs e.g., hire costs associated with vehicle downtime.
- Maintenance compliance and efficiencies – to locate broken down vehicles.
- Environment – improve fuel efficiency and other environmental benefits

6. USE OF TRACKING INFORMATION

The Trust shall use the tracking information in the following circumstances:

- Ensure the safe operation of vehicles by monitoring instances of speeding.
- Assist the Trust comply with section 172 of the Road Traffic Act 1988 i.e., the identification of the driver of a particular vehicle,
- Provide enhanced support for lone workers
- Provide accurate locations so that vehicles can be found in the event of a breakdown.
- Improve the security of the fleet and track stolen vehicles.
- Assist in improving working patterns, route optimisation and utilisation of the vehicles.
- Provide the ability to show live information on the location of the Trust's fleet, thus being able to respond to queries from customers.
- Provide an asset management/recording tool
- Assist the identification of additional payments e.g., Overtime
- Provide information, which can be shared with our wider stakeholders to give assurance on locations and times.
- Provide management information to defend claims for accident damage e.g., can prove location of tracked Trust vehicles at any given time.
- Assist managers to improve employee driving standards and reduce fuel usage and maintenance costs.
- Provide benchmarking data to allow comparison with external organisations
- 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 Trust vehicle e.g., personal reasons
 - Excessive breaks or idling times.

This is a non-exhaustive list. Where concerns are raised about an employee's working practice or conduct, a manager shall provide the information for consideration as part of any investigation.

7. DATA THAT CAN BE GATHERED FROM A GPS VEHICLE TRACKING SYSTEM

The system can provide both in real time and historical information which can be obtained direct from the tracking devices via a computer system with no intervention from the driver. In addition, the estates help desk function will be able to display the system in real time to assist with delegation of works and resource.

Exception reports will also be available and provided to managers/supervisors on a regular basis to enable them to monitor certain data sets. Examples of exception reports available for managers are as follows:

- Green Driving - Instances of harsh braking, acceleration, or cornering, excessive speed and idling will help use to improve our drivers' skills and minimise our environmental impact.
- Instances of excessive engine idling and over-revving.
- Working time directive - Details of hours worked, routes taken, time spent on site, overtime claims.
- Improved Risk Profile - Greater scrutiny of daily operations will assist the business to improve its risk rating which will in turn positively impact insurance premiums.
- Periodic checks on compliance with driving (no speeding/erratic driving etc has taken place) this should be reasonable and part of communications with the employee.
- Incident investigations
- When requested for Data by law enforcement agencies.

Please note that the above list is not exhaustive and new and additional reports will be designed and produced for managers/supervisors as the system is further developed. Managers/supervisors can also access ad hoc reports. It will be their responsibility to follow up on any issues identified by the exception reports, for example, through coaching, arranging driver retraining etc

8. EMPLOYEE GUIDANCE

Employees are required to adhere to the following when operating the Trust's vehicles and those fitted with vehicle tracking equipment:

Do

- Be aware that the vehicle tracking device and system is there for your safety and to protect you from prosecution or unwarranted claims.
- Be aware that information gathered by a vehicle tracking system can be used in a court of law should this become necessary.
- Always follow the designated route where this is set down or where that is not the case take the shortest and/or most practical route to your destination making best use of the Trusts resource.
- Shut off the engine when the vehicle is stationary for any length of time. Remember that it is an offence to leave a vehicle unattended whilst idling.
- Always to drive smoothly and avoid harsh braking, acceleration, and cornering.
- Do not over rev the engine.
- Always drive within the speed limit.

Be aware that the system can identify the vehicle's location, direction of travel, speed etc. at any given time whether in real time or as historical data.

Do Not

- Allow vehicles to idle for any longer than operationally necessary. The vehicle tracking system will monitor and report on all excessive idling time.
- Brake, corner or accelerate harshly or over rev the vehicle as again the vehicle tracking system will monitor and report on this. Such behaviour is unsafe, causes undue wear and tear to the vehicle and burns excessive fuel.
- Do not under any circumstances tamper with or attempt to deactivate the vehicle tracking device fitted to a vehicle.
- Do not use a Humber Teaching NHS Foundation Trust vehicle for any other reason other than in the execution of Humber Teaching NHS Foundation Trust business.

9. PROCESS FOR ACCESSING DATA FROM THE VEHICLE TRACKING SYSTEM

System users who have responsibility for monitoring the system will have access via a portal to track and monitor movements. Access will be via an individually assigned username and password. Passwords must not be shared with anyone else.

Historical data will only be accessed by the appropriate management as required within their job responsibilities should allegations be made of vehicle misuse, or dangerous driving. If allegations are thought to be true in nature this will be dealt with via the Trust's Disciplinary Policy and processes.

All users will be given training on the vehicle tracking system to ensure responsible use of the system. All information that is obtained from the vehicle tracking system will be held in a safe and secure manner, which observes the principles of the Data Protection Act 1998.

Routine exception and standard reports from the system will be set up and available for managers/supervisors. In addition, requests from individual employees or shop stewards to access the data will be considered and may be granted by the relevant manager where such information would assist in any formal investigation.

The vehicle tracking system may be used to systematically monitor the movements of employees/vehicles throughout the day for a legitimate purpose. Any monitoring must not be intrusive or excessive but must be appropriate with the aim, such as making better use of resource, investigating an allegation of vehicle misuse, or dangerous driving.

Whilst the vehicle tracking system is a useful management tool, it should not be used to replace normal good management practices.

Any manager/supervisor found to be seeking to monitor vehicles/employees and/or seeking to access data from the vehicle tracking system for no legitimate reason will be liable to be investigated themselves and may be subject to disciplinary action.

10. BREACH OF VEHICLE TRACKING POLICY

Any employee found to be in breach of this policy may be subject to a disciplinary investigation and action in accordance with Humber Teaching NHS Foundation Trust Disciplinary Policy.

Any employee who believes that the vehicle tracking system is being used inappropriately by a manager/supervisor and not for the purposes for which it was introduced, can submit a grievance in line with Humber Teaching NHS Foundation Trust Grievance Policy.

11. MONITORING AND AUDIT

The Director of Finance will be responsible for monitoring the effectiveness and reviewing the implementation of this policy, regularly considering its suitability, adequacy and effectiveness considering legal development and changes in the Trust's business. Any improvements identified will be made as soon as possible.

APPENDIX 1 – DOCUMENT CONTROL SHEET

This document control sheet, when presented to an approving committee must be completed in full to provide assurance to the approving committee.

Document Type	Policy		
Document Purpose	The purpose of this policy is to make employees aware of the presence of tracking devices in most vehicles and items of plant, explain the purpose of the devices, the rules on their use and to explain what data the system can provide and how the data gathered will be used by managers, supervisors, and in specific cases our clients and the public		
Consultation/ Peer Review:	Date:	Group / Individual	
<i>list in right hand columns consultation groups and dates -</i>	January 2023	<ul style="list-style-type: none"> Health and Safety Group 	
Approving Body:	EMT	Date of Approval:	24 July 2023
Ratified at:	Board	Date of Ratification:	27 September 2023
Training Needs Analysis: <i>(please indicate training required and the timescale for providing assurance to the approving committee that this has been delivered)</i>		Financial Resource Impact	
Equality Impact Assessment undertaken?	Yes [<input checked="" type="checkbox"/>]	No [<input type="checkbox"/>]	N/A [<input type="checkbox"/>] Rationale:
Publication and Dissemination	Intranet [<input checked="" type="checkbox"/>]	Internet [<input type="checkbox"/>]	Staff Email [<input type="checkbox"/>]
Master version held by:	Policy Management Team [<input checked="" type="checkbox"/>]	HealthAssure [<input checked="" type="checkbox"/>]	
Implementation:	<i>Describe implementation plans below - to be delivered by the Author:</i>		
	Uploaded onto the Trust intranet by the Policy Management Team		
Monitoring and Compliance:	Review by Estates Compliance Manager (Electrical) on a yearly basis or in line with good practice, to ensure that Standard operating procedures are reviewed and updated		

Document Change History:			
Version Number / Name of procedural document this supersedes	Type of Change i.e. Review / Legislation	Date	Details of Change and approving group or Executive Lead (if done outside of the formal revision process)
1.0	New Policy	July-23	New Policy. Approved at EMT on 24-July-23 and ratified at Trust Board 28-Sept-23

APPENDIX 2 - EQUALITY IMPACT ASSESSMENT (EIA)

For strategies, policies, procedures, processes, guidelines, protocols, tenders, services

1. Document or Process or Service Name: **Vehicle Tracking Policy & Procedure**
2. EIA Reviewer (name, job title, base and contact details): **Matthew Nicholson, Estates Compliance Manager (Electrical), Estates Dept, Mary Seacole Building, Willerby Hill. Tel: 477832**
3. Is it a Policy, Strategy, Procedure, Process, Tender, Service or Other? **Policy**

Main Aims of the Document, Process or Service		
<p>The purpose of this policy is to make employees aware of the presence of tracking devices in most vehicles and items of plant, explain the purpose of the devices, the rules on their use and to explain what data the system can provide and how the data gathered will be used by managers, supervisors, and in specific cases our clients and the public.</p> <p>This policy applies to all employees working at all levels and grades within Humber Teaching NHS Foundation Trust who have access to and are required to drive/operate any Humber Teaching NHS Foundation Trust vehicle.</p> <p>Please indicate in the table that follows whether the document or process has the potential to impact adversely, intentionally or unwittingly on the equality target groups contained in the pro forma</p>		
Equality Target Group Age Disability Sex Marriage/Civil Partnership Pregnancy/Maternity Race Religion/Belief Sexual Orientation Gender re-assignment	Is the document or process likely to have a potential or actual differential impact with regards to the equality target groups listed? Equality Impact Score Low = Little or No evidence or concern (Green) Medium = some evidence or concern (Amber) High = significant evidence or concern (Red)	How have you arrived at the equality impact score? 1. who have you consulted with 2. what have they said 3. what information or data have you used 4. where are the gaps in your analysis 5. how will your document/process or service promote equality and diversity good practice

Equality Target Group	Definitions	Equality Impact Score	Evidence to support Equality Impact Score
Age	Including specific ages and age groups: Older people, Young people, Children, Early years	Low	The Policy sets out responsibilities and arrangements to protect the safety of people involved with or affected by driving at work activities regardless of their age.
Disability	Where the impairment has a substantial and long-term adverse effect on the ability of the person to carry out their day to day activities: Sensory, Physical, Learning, Mental Health (and including cancer, HIV, multiple sclerosis)	Low	Where an individual's sensory, physical, learning, or mental health may adversely impact on their ability to undertake driving at work activities, a specific risk assessment is required to be carried out by the Line Manager
Sex	Men/Male, Women/Female	Low	The requirements of the policy apply equally
Married/Civil Partnership		Low	The requirements of the policy apply equally
Pregnancy/ Maternity		Low	Where an individual's pregnancy may adversely impact on their ability to undertake driving at work activities, a specific risk assessment is required to be carried out by the Line Manager. Where the risk assessment identified a requirement to implement a reasonable adjustment to the individual's work activity, the Trust would seek to implement this adjustment.
Race	Colour, Nationality, Ethnic/national origins	Low	The requirements of the policy apply equally to any race.
Religion or Belief	All Religions Including lack of religion or belief and where belief includes any religious or philosophical belief	Low	The requirements of the policy apply equally to any to any religion or belief.
Sexual Orientation	Lesbian, Gay Men, Bisexual	Low	The requirements of the policy apply equally to any sexual orientation
Gender re-assignment	Where people are proposing to undergo, or	Low	The requirements of the policy apply

	have undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attribute of sex		equally to all genders.
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Summary

<i>Please describe the main points/actions arising from your assessment that supports your decision above</i>			
This policy sets out how the Trust will comply with the monitoring of all Trust Vehicles with trackers installed and would not have a negative effect on any of the above equality groups. Currently this applies to all Estates, Hotel Services and Pool Vehicles. However, should other Trust Departments require tracking devices installed, they should refer to this policy.			
EIA Reviewer:	Matthew Nicholson Estates Compliance Manager (Electrical)		
Date completed:	25 January 2023	Signature:	