



Management and Use of Vehicle Telematics

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Approved by

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|----------------|----------------------------------|
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Note: By signing the above you are authorising the policy for publication and are accepting responsibility for the policy on behalf of the Chief Constables

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Note: Please send the original Policy with both signatures on it to the Norfolk CPU for the audit trail

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Legal Basis

Legislation/law which you must check this document against (required by law)

| <i>Act (title and year)</i> |
|--|
| Human Rights Act 1998 (in particular A.14 – Prohibition of discrimination) |
| Equality Act 2010 |
| Crime and Disorder Act 1998 |
| Health and Safety at Work etc. Act 1974 and associated Regulations |
| General Data Protection Regulation (GDPR) and Data Protection Act 2018 |
| Freedom Of Information Act 2000 |
| The Civil Contingencies Act 2004 |
| Protection of Freedoms Act 2012 |

Other Related Documents

- Drivers of Police Vehicles Policy
- Management of Police Pursuits Policy
- Transport Policy
- Surveillance Camera Code of Practice
- Management and Use of Vehicle Telematics Equality Impact Assessment

1. Introduction and Purpose

- 1.1 Telematics systems are being installed into selected Norfolk and Suffolk Constabularies' vehicles. The technology is widely used by the insurance industry to monitor driving behaviour and will assist with the underwriting terms of the Constabularies' insurance provider.
- 1.2 Telematics recorders in vehicles enhance the Constabularies' ability to:
- Maintain fleet optimisation with the placement or reduction of vehicle numbers and increased fleet utilisation;
 - Reduce fuel usage and the number of road journeys via better utilisation of the fleet;
 - Reduce maintenance costs through less component wear and tear (e.g. tyres);
 - Make safety improvements, cost savings and environmental benefits through reduced carbon emissions;
 - Improve the risk management of the fleet to reduce the number and value of collisions that occur;
 - Investigate serious and fatal police vehicle collisions;
 - Assist in the investigation of a police vehicle driving complaint or incident where it is deemed necessary;
 - Inform / improve driving standards to enable targeted training and support, resulting in improved public confidence and service levels;
 - Support motor insurance claims.
- 1.3 The system comprises an electronic device permanently fitted to the vehicle which records and transmits that vehicle's activity, location and the identity of the driver for all journeys, in addition to a forward-facing dashboard camera (dashcam). The dashcam records footage whilst the vehicle is running. Audio is not being recorded or monitored.
- 1.4 Under normal circumstances the dashcam will overwrite footage, but certain driving behaviours will trigger alerts that are automatically downloaded for viewing by Transport Services on the telematics system. In addition, an information card held within the vehicle details the process that allows the driver to manually create an alert by pressing a button on the dashcam.

- 1.5 The system will provide feedback on driver activity against the criteria stated in this policy and should be read in conjunction with the [Other Related Documents](#).
- 1.6 The current incident data function installed within the system is not being used for incident investigation purposes. A more comprehensive system is being developed with the suppliers.
- 1.7 Some vehicle roles are excluded from the installation of telematics, e.g. those allocated for covert use, such as Serious and Organised Crime Directorate and where the sensitivity of locations may compromise operational policing, e.g. Dedicated Source.
- 1.8 Signage will be clearly visible within the vehicle to indicate the fitment of vehicle telemetry.
- 1.9 This policy takes into account the Data Protection Act 2018, Information Commissioner's Office (ICO) Guidance, the requirements of the Surveillance Camera Code of Practice and other legislation cited under [Legal Basis](#).

2. Policy Applicability and Scope

- 2.1 This policy applies to all users of police vehicles equipped with the telematics system and outlines how the system works, how the data will be collected, used, requested and retained.
- 2.2 Vehicles allocated to the ranks of Superintendent and Chief Superintendent for on-call purposes (Command Platform) are installed with a telematics system. Due to the approved private use element of a Command Platform, the vehicles are installed with a driver display unit that allows the driver to differentiate between a business and private journey. The driver display unit has a private and business button. Once the driver determines the journey type, a business journey is monitored whereas a private journey deactivates the system.

3. Overview of the System

- 3.1 The system is activated by the driver at the start of every journey by a unique identifier for use solely by that individual.
- 3.2 The management and administration of identifiers (including replacement in the event of a fault or loss) will be carried out by Transport Services. Identifiers will be provided to all personnel authorised to drive police vehicles.
- 3.3 Appropriate guidance on operation of the system will be provided by Transport Services when identifiers are allocated to personnel.

- 3.4 Telematics units record vehicle journey data that will provide information on:
- Vehicle location;
 - Vehicle availability and usage;
 - Identification of driver;
 - Driving style;
 - Fuel usage;
 - Emergency equipment usage (blue lights and audible warning);
 - Forward-facing dashcam footage.
- 3.5 The telematics data recorder will automatically record and store selected data from sensors within the vehicle that include:
- Acceleration
 - Braking
 - Engine revs
 - Speed
 - Cornering
- 3.6 The parameters set for the above criteria will depend on the vehicle's role and will be agreed by the Transport Standards Group, e.g. a marked vehicle's parameters will differ from those set for a pool car. The parameters will be regularly reviewed and assessed by the Transport Standards Group.
- 3.7 The telematics recorder is not a Type Approved device, as authorised by the Secretary of State, for corroborating excess speed offences but it is sufficiently accurate to be used to offer advice to drivers, where appropriate.
- 3.8 Following a pilot, it is anticipated that roll-out of the system will commence in late 2018 and will be fully implemented in early 2019.
- 3.9 When fully implemented and deployed, telematics will replace the requirement to complete journey details in the vehicle log book. Users will be notified upon this change over.

4. Driver Behaviour

- 4.1 Although the fitment of a telematics device is an effective fleet monitoring tool and a technological response to police vehicle collision reduction and investigation, its effectiveness is partly psychological from the realisation that driving performance is being monitored.
- 4.2 A Transport Standards Group will be established and include key stakeholders from the Serious Collision Investigation Unit, Roads Policing, Driver Training, Professional Standards Department, Transport Services, Staff Associations and representation from CPC Commanders.
- 4.3 There are clear guidelines for all users of the Constabularies' police vehicles regarding standards of driving. These are available in the [Drivers of Police Vehicles](#) and [Management of Police Pursuits](#) policies. The College of Policing Authorised Professional Practice (APP) for 'Driver Training' and 'Pursuit Management' are available via their [website](#).

The Telematics Support Officer will complete checks of the telematics system. Reports will be generated based on the requirements of the Transport Standards Group. In the first instance, any issues arising from the reports which highlight the vehicle has been driven in excess of the parameters set will be resolved locally. The overriding objective is to improve driving style and driver behaviour through support and learning, by identifying and mitigating any risks and prioritising driver training needs.

- 4.4 Where appropriate, the line manager may decide to liaise with the Driver Training Lead to ensure the driver receives any required training.
- 4.5 Data collected from the telematics system will be available to the Driver Training Lead to evaluate and target driver training.
- 4.6 In respect of an individual's rights to appeal or raise a grievance, the existing grievance procedures with an appeals facility / right to make representation will cater for any such issues. As regards external complaints, civil remedies are available in addition to an individual's rights under the IOPC Procedures.

5. Data Collection / Storage and Data Requests

- 5.1 Telematics vehicle usage information is accessed via a secure internet application. The data will be collected, analysed and reported on by the Telematics Support Officer based on the criteria identified in Section 1.
- 5.2 The following departments / roles may be involved in the collection and analysis of the information:

- Transport Services
- Driver Training
- Roads Policing – Collision Investigation Unit (for collision incident data only)
- Line Managers
- The Transport Standards Group
- Professional Standards
- Staff Associations

5.3 In addition to the journey data, the device will store and retain incident data (IDR) in the event of an impact the system will automatically activate itself to record additional data.

5.4 The disclosure principles contained within this policy which deal with the Attorney General’s guidelines on disclosure must be applied to the data stored. Officers investigating police-owned vehicle collisions will ensure the completed file, which is forwarded for a decision to be made, contains the appropriate information regarding the data limitations and any statement interpreting such data, thus allowing decision makers to be in possession of all information upon which to base their decision.

5.5 The Telematics Support Officer will be responsible for keeping records of all downloads, analysing data, identifying trends, opportunities and best practice that will lead to improvement and a reduction in vehicle spend.

5.6 Formal requests for vehicle and driver data should be made to the Telematics Support Officer where they will be assessed to ensure disclosure is for an official policing purpose. Requests can only be authorised by an Inspector or above (or staff equivalent).

5.7 Should any request to download telematics data be refused, the requester may appeal to their Head of Department within ten days of a refusal.

5.8 The Professional Standards Department may need to supply data from the telematics systems to the Independent Office for Police Conduct or other Police Forces, should the need arise.

6. Review, Retention and Disposal of Telematics Data

6.1 Telematics data will be retained in accordance with the Constabularies’ Review, Retention and Disposal of Crime and Non-Crime Related Information policy and the [Review, Retention and](#)

[Disposal of Crime and Non-Crime Related Information Schedule](#). Data in relation to civil litigation and for audit / analytical purposes will be retained in accordance with the terms of this schedule. Data relating to criminal investigations will be retained in accordance with the [College of Policing Authorised Professional Practice \(APP\) on the Management of Police Information \(MoPI\)](#).

- 6.2 Dashcam footage in relation to non-evidential material and material of an evidential nature will be retained in accordance with the Constabularies' Review, Retention and Disposal of Crime Related Information policy and the [Review, Retention and Disposal of Crime and Non-Crime Related Information Schedule](#).
- 6.3 Dashcam footage relating to Non-Crime traffic process incidents and data relating to criminal investigations will be retained in accordance with the [College of Policing Authorised Professional Practice \(APP\) on the Management of Police Information \(MoPI\)](#).

7. Data Protection Legislation

- 7.1 This policy has been written giving consideration to the [General Data Protection Regulation \(GDPR\) and Data Protection Act 2018](#) ("Data Protection Legislation") which set out the requirements for how organisations process personal data. Information processed that can identify an individual or learn about their activities is described as personal data and will be covered by the data protection legislation. This is therefore likely to consist of telematics data captured including dashcam footage. Any concerns in respect of privacy have been addressed by way of a Data Protection Impact Assessment (DPIA).
- 7.2 Individuals have a number of rights enshrined in the data protection legislation including the Right of Access and the Right to Erasure. Should any individual wish to exercise their rights in relation telematics data, they should contact either the Norfolk or Suffolk Data Protection team.