
Vehicle Tracking Policy

1. Introduction

In order to allow Malakoff to track vehicle movements, driving style, idling time, and fuel consumption, amongst other metrics, the Company are using the C-Track Vehicle Tracking System, which is installed on all Malakoff owned vehicles.

This tracking will help to improve company productivity, environmental management, fuel cost, and vehicle insurance cost.

2. Use of Tracking Information

The information gathered from the tracking system shall be primarily 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.

The tracking system shall also be used to locate employees in the event of an emergency, ensuring management know 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.

In the case of a complaint that has been received about individuals in relation to misconduct, inappropriate behaviour or incidents resulting in damage to third party property, insurance claims, etc., information from the tracking system shall be utilised as part of the investigation.

3. Data Protection Implications

All Malakoff owned vehicles are pool vehicles, which means that no one person can be identified through the tracking system. Therefore, no data retrieved through the tracking system is designated as personal data under the Data Protection Act 2018.

However, if there is a case that an individual can be identified through the vehicle tracking system, the requirements of the Data Protection Act 2018 must be complied with, as follows:

- Only relevant supervisory staff shall have access to vehicle tracking information, including location of 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 Malakoff's Data Protection Officer (HSQE Manager), email: jszego@malakofflimited.co.uk, 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.
- Malakoff shall make sure that personal data is stored in a secure, confidential manner and access 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 Malakoff 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 Malakoff, for the purposes of preventing fraud, misuse of public funds and any legal or statutory requirements.

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4. Statement of Understanding by the Employee

All staff shall be asked to sign a copy of this Policy to confirm they understand the contents of this Policy and the uses of the tracking information.

5. Disciplinary Action

Deliberate damage to the tracking software or hardware shall be dealt with in accordance with Malakoff's Disciplinary Rules and Disciplinary 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 Malakoff's Rules and Procedures.

6. Review

The policy will be reviewed annually during the Management Review meeting and updated as and when any new regulations or processes are introduced within the company.

Signed By:



Director

Date: 11 July 2022

Endorsed By: Allan Gould, Non-Executive Director
Douglas Stevenson, Director
Colin Duncan, Director

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