

AUTOMATIC VEHICLE LOCATION POLICY

Purpose

To establish the Province of Manitoba procedures for the installation and utilization of Automatic Vehicle Location (AVL) devices in Vehicle and Equipment Management Agency (VEMA) owned vehicles.

Scope

This policy applies to the installation and utilization of AVL devices and to all employees who use VEMA vehicles and/or are responsible for VEMA vehicle administration, system administration and use of data collected.

Definitions

“Administrator” means a delegated authority who is responsible for the access rights, configuration and upkeep within the AVL provider information portal on behalf of the respective Department, Agency or Crown Corporation. This could be but is not excluded to a Fleet Vehicle Coordinator, Manager, Financial Auditor or Director.

“Automatic Vehicle Locator” is a means for automatically determining and transmitting the geographic location of a vehicle. The device has the capacity to track and record the actions of vehicles.

“Vehicle” means a vehicle that is leased from the Vehicle and Equipment Management Agency (VEMA).

“Management” means the Managers, Directors and/or Executive Directors of the user groups.

“Personal Information” means recorded information about an identifiable individual as defined by *The Freedom of Information and Protection of Privacy Act* (FIPPA).

“Vehicle Equipment Management Agency (VEMA)” means the Vehicle and Equipment Management Agency.

Policies and Procedures

Departments, Agencies and Crown Corporations are responsible for the management of the vehicles leased from VEMA and must ensure that the use of these vehicles is in accordance with Provincial Government Policies and relevant laws and regulations set out in *The Drivers and Vehicles Act*, *The Highway Traffic Act*, *The Manitoba Public Insurance Corporation Amendment Act*, *The Workplace Safety and Health Act* and *The Freedom of Information and Protection of Privacy Act*.



The use of automatic vehicle locators (referred to as AVL) provides user groups the ability to access up-to-date driver performance information. Alerts are automatically communicated from the system to the delegated departmental contact. An alert can be issued for speeding and hard braking, as well as other collision indicators such as G-Force.

The policies and procedures related to AVL devices installed in VEMA vehicles are divided into the following sections:

- Ownership, Installation, Removal and Maintenance of AVL Devices
- Modification/Adjustment of AVL Devices
- Notification about Device Use in VEMA Vehicles
- System Access Rights
- Data Collection
- Data Use
- Data Retention
- System Data and Confidentiality of Personal Information

Ownership, Installation, Removal and Maintenance of AVL Devices

AVL devices and any applicable hardware or cabling are the sole property of VEMA. VEMA is responsible for the removal, installation and maintenance of AVL devices installed in fleet vehicles.

Modification/Adjustments of AVL Devices

No employee shall tamper with, modify or adjust any settings or otherwise cause any interference with the operation of the devices or its' monitoring capabilities unless authorized to do so by the Vehicle and Equipment Management Agency. To do so could result in disciplinary action.

Unauthorized modification/adjustments will be investigated by VEMA and/or a departmental representative.

- System data information may be used to verify device operation or usage status if deviations are experienced.
- The Administrators are responsible for investigating device operation deviations and must report any device operation issues or damage to VEMA.

Notification About Device Use in Vehicles

User group management will actively communicate to staff that AVL devices have been installed in VEMA supplied vehicles and will notify staff about AVL use.

Appropriate notification about AVL devices installed in VEMA vehicles will be identified by signage that may include but is not limited to the following:

- Key Chain Tag
- Notification Decal(s)

System Access Rights

User group administrators have access to data and are able to create and view system reports.

Financial services may be provided access to data for the purposes of financial audits and to ensure departments are meeting its comptrollership obligations with respect to vehicle and expense management.

Management has access to live, vehicle location data for purposes such as working alone, expense claim management and assignment of work. Managers may request additional system reports from an Administrator when required - see Section Data Use.

User groups are expected to provide AVL information access only to individuals whom would require this information as part of their roles/responsibilities with the Province. Care and consideration should also be taken to ensure that access levels do not exceed what the role/responsibility would require to fulfill their provincial obligations.

Data Collection and Storage

AVL devices collect data relating to the geographic location and operational activities of the vehicles in which the devices are installed. The devices have the capacity to track and record the actions of tracked vehicles.

Data collected by AVL devices installed in vehicles is defined and attached as “Appendix A” to this policy. This information may include but is not excluded to the data presented in “Appendix A”.

Data Use

Data collected may be accessed and used for the following:

- Investigation of a collision or safety and health incident involving a vehicle.
- Operation of the vehicle Preventative Maintenance Program.
- Investigations of complaints about the operation of a vehicle.
- Verification of Monthly Vehicle Distance Reports.
- To ensure the safety of staff working alone according to the user groups Working Alone Plan.
- To assess processes or priorities associated with work efficiency.



AVL data may be used for purposes such as:

- verifying information or investigating a complaint or concern about a staff member;
- investigating a vehicle collision or other vehicular incident; and
- alerting management where staff and/or the public is at risk, such as unsafe driving.

Live monitoring of AVL location data will only be used to address operational needs, security or maintenance of the Province's vehicles, or the safety of its employees or the public. Information obtained during live monitoring may where appropriate become part of an investigation into employee performance, but the employer shall not initiate access to live data for the purpose of searching for undiscovered performance events.

AVL data may be used in performance management, but not as the first source of information, unless the AVL system flags behaviours that place the safety of an employee or the public at risk (i.e., speeding, travel without seat belt use).

Management will make every effort to use the least intrusive method or source of information available when investigating performance management concerns.

Data Retention

All electronic data collected by the system is securely kept online. There is a three-year time limit for accessing AVL data stored online.

Printed reports from the AVL system will be retained by the user group in a secure location and stored in accordance with the requirements of the Canada Revenue agency, as well as Branch archiving procedures and schedules.

System Data and Confidentiality of Personal Information

The AVL system records data as described in "Appendix A" of this policy. The system records information associated with the use of the vehicles. This use may include personal use including travel directly from an individual's residence which could result in personal information being collected, namely the home address of an individual. The home address of an individual is considered to be personal information and is protected by FIPPA.

The Oath of Office is a solemn promise by government employees to discharge their duties responsibly and to refrain from disclosing any information which may come to them by reason of their employment in the government services.

All Provincial employees shall maintain the confidence of AVL data in accordance with this policy, the Oath of Office and FIPPA.

APPENDIX "A"

1) The AVL system collects and records all data captured by the vehicle computer including but not excluded to:

- Date of Use
- Vehicle ID Number
- Trip Start Time
- Vehicle Location
- Seat Belt Usage
- Distance Travelled
- Trip End Time
- Drive Duration
- Stop Duration
- Distance Travelled
- Fuel Usage
- Idle Duration
- Max Speed (KMPH)
- Speed Profile
- Odometer

2) Alerts, for select information, including speeding and collision indications, are automatically communicated from the system to the delegated user group contact.

3) Examples of reports that the system can generate include:

- Trip History (e.g. location of vehicle, length of time vehicle is stopped, idling, driving)
- Risk Management Report (e.g. idling time, time spent over speed limits, average speeds, stops)
- Vehicle Summary (e.g. licence number, VIN, odometer)
- Speed Profile (e.g. speed compared to speed limit for duration of trip)
- Activity and Trips Summary Report