



Privacy Impact Assessment

Vehicle Management System

Version 8
16 October 2018

Part A – PIA Screening Questions

Question	Y/N	Additional Comments (optional)
Will the project involve the collection of new information about individuals?	Y	Data collected via vehicle Dashcam is new. Everything else is already collected via existing processes.
Will the project compel individuals to provide information about themselves?	N	
Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	Y	
Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	Y	
Does the project involve you using new technology that might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.	Y	
Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them?	Y	
Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be private.	Y	
Will the project require you to contact individuals in ways that they may find intrusive?	N	

Part B – Outline Requirement for PIA

Project Aim and Objectives

To install a vehicle management system across the entire council fleet. The Economy, Transport and Environment/Communities Department has had a vehicle management system since 2014. Cabinet on 8 June 2017 agreed to extend the existing contract for ETC (as was) vehicles and to start the procurement of a system to cover the entire council fleet.

Benefits to the organisation, to individuals and to other parties

The benefits to the organisation are:

- a) Management of Operational Road Risk and Health and Safety
- b) Better utilisation of vehicles
- c) Reduction of insurance claims and costs
- d) Reduction of mileage and fuel costs

The benefits to individuals are:

- a) Increased employee safety through panic alert function and knowledge of whereabouts,
- b) Provision of information about driving habits to identify those that could benefit from additional training, and
- c) To defend complaints or unfounded allegations.

Links to any relevant project documentation

Cabinet report – 8 June 2017:

https://www.derbyshire.gov.uk/council/meetings_decisions/meetings/cabinet/862017_cabinet.asp

Cabinet report – 1 February 2018:

https://www.derbyshire.gov.uk/council/meetings_decisions/meetings/cabinet/01022018_cabinet.asp

Cabinet Report – 26 July 2018

<https://www.derbyshire.gov.uk/council/meetings-decisions/meetings/cabinet/cabinet-26-july-2018.aspx>

Summary of Identified Need for PIA

As the system is being installed in departments that have not previously had VMS, a PIA is considered necessary to ensure that any personal information is handled appropriately. The system will identify who is driving a vehicle at any one time.

Although this data will be simply name and employee number, when coupled with the location of the vehicle and the driver, it is possible that this could constitute personally identifiable information. In most circumstances this information won't be sensitive, however there are occasions when it could be, for example, when a vehicle is parked at the driver's home.

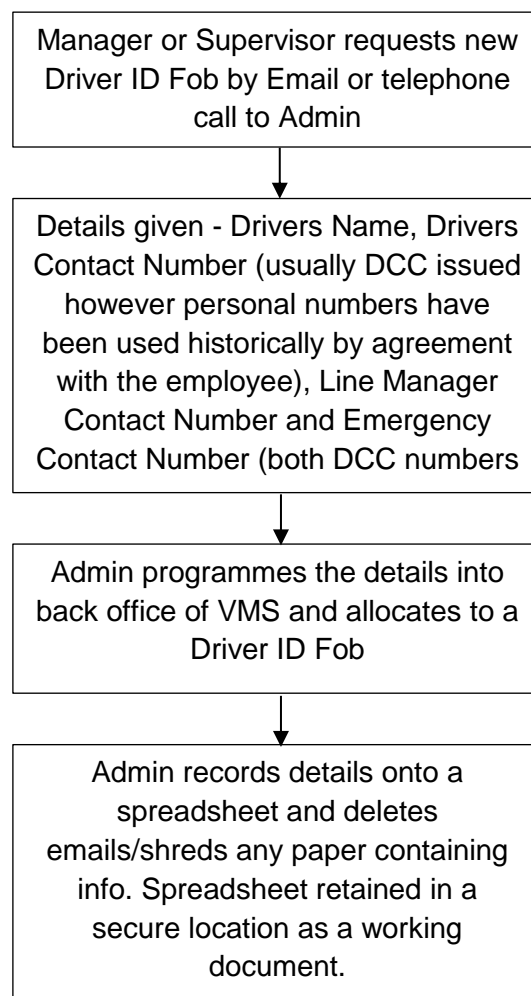
It is of course perfectly reasonable for the employer to know the location of vehicles and drivers whilst at work, but the council recognises that it has a responsibility to ensure this information is only available to relevant people at the appropriate time and in the appropriate way. It will also be necessary to ensure the supplier has the appropriate procedures in place to safeguard personal data.

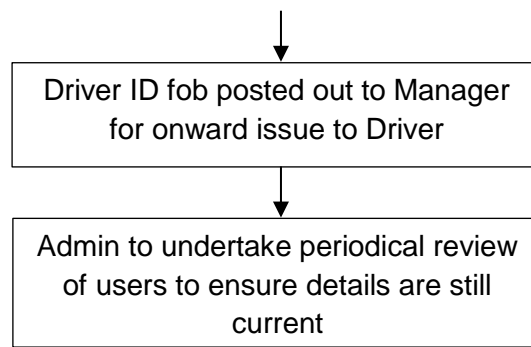
The system will also incorporate dash cams (cameras on the dashboard of vehicles) to capture footage in relation to accidents and incidents. The PIA will cover the access, use and storage of this footage.

Part B – Information Flows

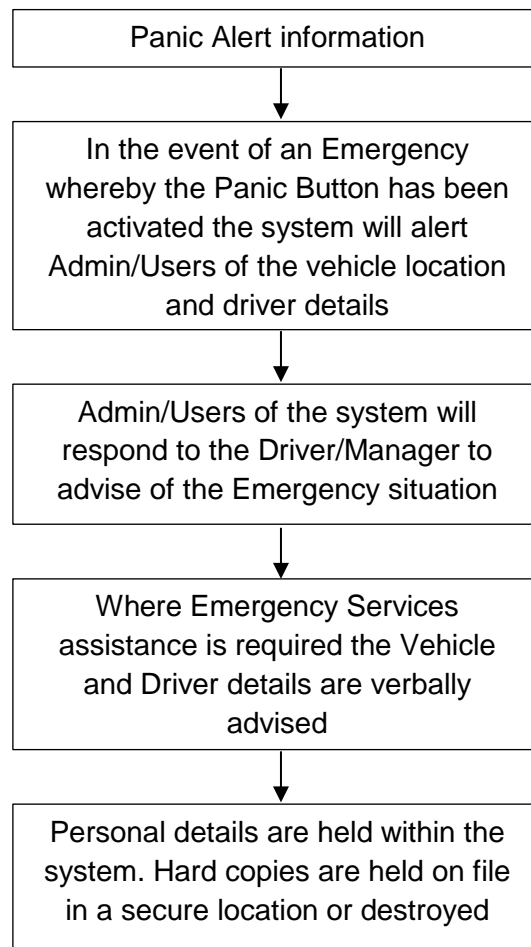
Any individual driving a DCC vehicle is affected by this project. At this time that is in the region of 1200 employees. The flowcharts below detail how information is collected, stored, shared and deleted.

Driver ID

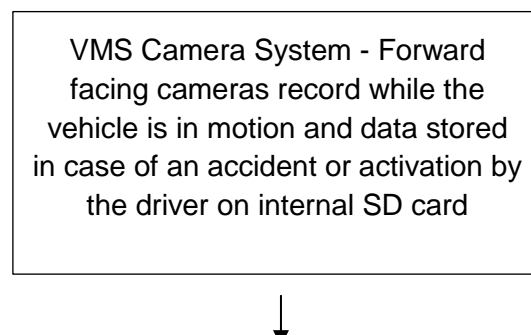


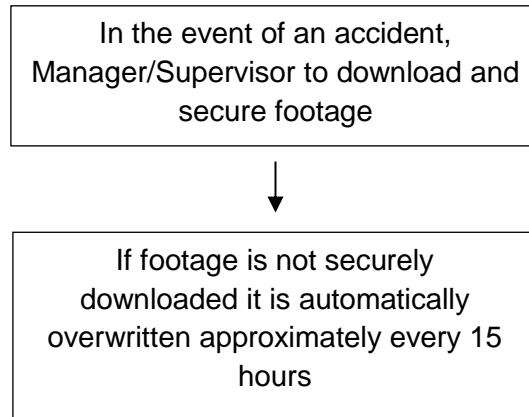


Panic Alerts

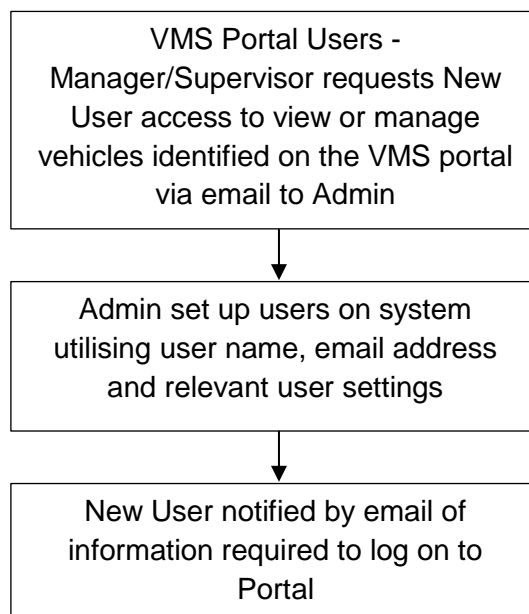


Dash Camera Footage

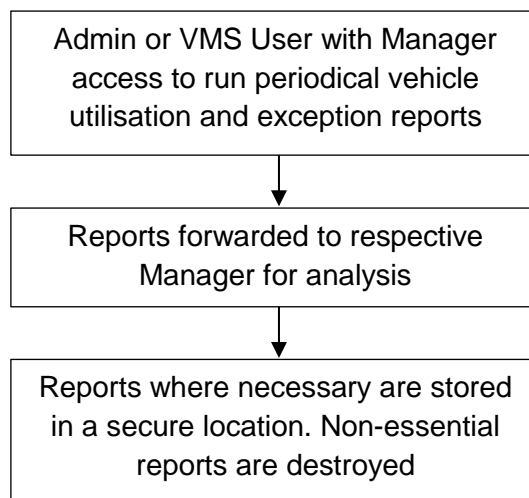




VMS Users



VMS Reports



Part B – Consultation Requirements

The following groups have been consulted as a part of the implementation of a Council-wide VMS:-

- Trade Unions,
- Employees who drive DCC vehicles, and
- Managers of those employees will be consulted.

The consultation outlined the purpose and benefits of VMS, the implementation plan and timescales, and the contents of the VMS Protocol and managers' guidelines.

The VMS Protocol outlines:

- How VMS will be managed,
- What information is gathered by the VMS,
- Who can access VMS information,
- What VMS information will be used for,
- Driver responsibilities,
- Manager responsibilities*,
- Emergency procedures,

* A separate guidance document for managers has been produced to help ensure managers use the system and information appropriately and this will also be consulted on.

The consultation arrangements were set out in the Cabinet report and comprised:

- A meeting for Trade Union representatives to outline the purpose and benefits of VMS, the implementation plan and timescales, and the contents of the Protocol and managers' guidelines.
- A briefing note for employees who are drivers of DCC vehicles to provide the above information.
- A six week period for Trade Unions and employees to respond and provide their views on the proposals and protocol.

Part B – Privacy Risks, Solutions and Approval

Privacy Issue	Risk to Individuals	Compliance Risk (Against Data Protection Principles)	Organisation Risk	Solution	Is Risk Eliminated, Reduced, Accepted	Evaluation: is the final impact on individuals after implementing each solution a justified, compliant and proportionate response to the aims of the project?	Approved By
Personal details of employees will be on the system and should be accessed, stored, retained and disposed of appropriately.	Personal phone numbers being available to managers, Call Derbyshire and Highways Hub.	1, 2, 3, 4, 5, 6, 7	Financial, Human Resource.	Phone number will normally be DCC mobile but may occasionally be personal number voluntarily provided by employee. Driver briefings will take place to advise employees about information collected and used.	Accepted	Yes	
Employee's home address could be identified from where a vehicle is parked	When vehicle is parked at home address (i.e. when off duty) it may be possible for anyone with legitimate access to the employee's	1, 2, 3, 4, 5, 6, 7	Financial, Human Resource.	Managers will normally only have access to the information for their employees not the whole workforce. Call Derbyshire will only access the information to respond to panic alert calls.	Reduced	Yes	

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	details to identify where they live.			When off duty the key fob will not be activated therefore it will not be possible to identify who lives at the address without further investigation which is classed as inappropriate use and covered in the protocol and guidelines. Driver briefings will take place to advise employees about information collected and used.			
Retention of employee information	Information could be retained when no longer needed e.g. if employee leaves	5	Financial, Human Resource.	Information should only be kept for as long as needed and disposed of appropriately in accordance with the retention schedule. Driver briefings will take place to advise employees about information collected and used.	Reduced	Yes	
Call Derbyshire/ Highways Hub will require access to employees' information to deal with panic alerts	A wider group of people have access to the information	2	Financial, Human Resource.	The systems used by Call Derbyshire/ Highways Hub for dealing with panic alert calls should be clear. Driver briefings will take place to advise employees about information collected and used.	Reduced	Yes	

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Reports will be produced from the system containing location of employees and driving behaviour. They should be used, stored, retained, and disposed of appropriately.	Whereabouts of drivers and driving behaviour being recorded	1, 2, 3, 4, 5, 6, 7	Financial, Human Resource.	Reports generated by the system will only be used for legitimate purposes in accordance with the updated VMS protocol and managers guidelines and retained, stored and disposed of appropriately. Driver briefings will take place to advise employees about information collected and used.	Reduced	Yes	
Facility for accessing Dashcam footage will be available.	Footage could be captured on an SD card which may include footage of employees or members of the public	1, 2, 3, 4, 5, 6, 7	Financial, Human Resource, Reputational.	Information will only be downloaded by authorised managers where there is a legal basis for doing so in accordance with the three stage test below * Tamper tape will prevent any unauthorised access to the SD card. Any information gathered will be handled in accordance with existing procedures and retention schedules and incorporated into the updated protocol and manager's guidance. Driver briefings will take place to advise employees about	Reduced	Yes	

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				information collected and used. If footage is required to be downloaded in relation to sensitive sites eg DCC operatives carrying out work for the Police, permission would be sought before processing. This approach has been agreed with Derbyshire Police. Sound will not be recorded.			
Dashcam footage may be accessible to third parties via Wi-Fi using a mobile application.	Footage could be accessed which may include footage of employees or members of the public	1, 2, 3, 4, 5, 6, 7	Financial, Human Resource, Reputational.	Default password will be replaced using a password that meets the Council's password policy. Driver training will take place to advise employees about the use of the dash cam.	Reduced	Yes	
Pool vehicles can be driven by employees who are not regular drivers and therefore require specific briefings	Correct handling of information. Employees will need briefing when booking pool vehicles	1, 2, 3, 4, 5, 6, 7	Financial, Human Resource	Ensure protocol and guidelines reflect good practice in relation to pool vehicles where different employees may be drivers. Employee will be briefed before using vehicles.	Treated	Yes	
Third party supplier will need to adhere to data protection	Correct handling of information	1, 2, 3, 4, 5, 6, 7	Financial, Human Resource, Reputational	Ensure system supplier has appropriate controls in place through the contract.	Reduced	Yes	

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and privacy regulations							
Employees providing internal support to manage the system will need to adhere to data protection and privacy regulations	Correct handling of information	1, 2, 3, 4, 5, 6, 7	Financial, Human Resource	Ensure anyone requiring access to the system only has access to the information they need for that purpose at the time it is required.	Treated	Yes	
Where agency workers drive DCC vehicles they will require specific briefings	Correct handling of information. Agency workers will need briefing when arriving for work/driving	1, 2, 3, 4, 5, 6, 7	Financial, Human Resource	Ensure contracts with agencies providing workers provide for the use the system to apply to those workers. Agency workers will be briefed.	Treated	Yes	

* The relevant legal basis for downloading/processing dash cam footage by authorised managers in accordance with the General Data Protection Regulation is:

Article 6(1)(f) – processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

A three stage test will be applied in each case:

1. Are you pursuing a legitimate interest? Yes, to monitor the vehicle usage, to pursue legal claims as required in relation to vehicle accidents, to monitor employee usage of vehicles.
2. Is the processing necessary for that purpose? Yes, in the event of an accident or incident the footage may provide evidence to investigate the circumstances.
3. Do the individual's interests override the legitimate interest? No. Employees will be informed of the processing so there is a reasonable expectation that it will be carried out. Any processing of personal data relating to members of the public will be limited and is unlikely to infringe the individual's rights.

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Approval Signatory:

Part B – Integrate PIA Outcomes into Project Plan

Actions to be taken	Date for completion	Responsibility for action
Ensure managers only have access to information relating to their employees and that this is kept up to date		
Information relating to employees should only be kept for as long as needed and disposed of appropriately.	On implementation	
The systems used by Call Derbyshire/ Highways Hub for dealing with panic alert calls should be written down and clear.	On implementation	
Reports generated by the system should only be used for legitimate purposes in accordance with the VMS protocol and stored and disposed of appropriately.	On implementation	Managers
Dashcam footage should be accessed and handled in accordance with protocols and in appropriate circumstances as described above.	September 2018	Authorised Persons

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Dashcam setup with secure password and “tamperproof” seals.	On Commissioning	
Leavers – drivers and users – formalise the system for ensuring leavers are removed from the system	Karl Roper	July 2018
Contracts with providers of agency workers to cover the use of the system	Karl Roper	July 2018
Protocol and managers guidance – this will be updated through the consultation process and once the functionality of the new system is known	Angela Glithero	July 2018
Employees affected will be briefed – to include existing and new employees, agency workers, users of pool vehicles	On implementation, and through induction of new employees and agency workers, and as part of pool vehicle processes	Managers

Contact for future privacy concerns		