



# Driver and Vehicle Data Management Policy

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## POL140 – Driver and Vehicle Data Management Policy

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Equality Analysis	Yes
Linked procedural documents	Driving Trust Vehicles Driving Standards Policy Collision Investigation Adjudication & Trust Vehicle Collision Reporting Procedure Data Protection Policy Information Governance Policy Data Protection Act, 2018 General Data Protection Regulations
Dissemination requirements	To all staff via East24
Part of Trust's publication scheme	Yes

The East of England Ambulance Service NHS Trust has made every effort to ensure this policy does not have the effect of unlawful discrimination on the grounds of the protected characteristics of: age, disability, gender reassignment, race, religion/belief, gender, sexual orientation, marriage/civil partnership, pregnancy/maternity. The Trust will not tolerate unfair discrimination on the basis of spent criminal convictions, Trade Union membership or non-membership. In addition, the Trust will

POL0140 – Driver and Vehicle Data  
Management Policy  
February 2023, v1.0

**#WeAreEEAST** 

POL140 – Driver and Vehicle Data Management Policy have due regard to advancing equality of opportunity between people from different groups and foster good relations between people from different groups. This policy applies to all individuals working at all levels and grades for the Trust, including senior managers, officers, directors, non-executive directors, employees (whether permanent, fixed-term or temporary), consultants, governors, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with the Trust.

All Trust policies can be provided in alternative formats.

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## 1. Introduction

The Driver and Vehicle Data Management System (DVDMS), fitted to East of England Ambulance Service NHS Trust (the Trust) fleet, is a vehicle telemetric system used extensively in commercial and emergency services vehicle fleets. Its purpose is to record vehicle operations and driving behaviours.

At the time of writing, each emergency vehicle houses a digital device which records data from the vehicle electronic control system, emergency equipment control system, and driver identity remotely. Data is continuously recorded and can be accessed by authorised staff via a governed process. The data cannot be manipulated.

Through the use of the DVDMS, the Trust aims to improve safety and driving standards and reduce road risk. It also aims manage its fleet remotely and identify areas for fleet efficiency.

Upon fleet replacement, the Trust aspires to fit a device to all vehicles as they are commissioned, including patient transport vehicles, pool vehicles, and privately leased vehicles (which shall need the lessor's permission to activate).

## 2. Purpose

The purpose of this policy is to clearly document the roles and responsibilities of those stakeholders involved in the maintenance and use of the DVDMS. Additionally, the governance arrangements surrounding the access and security of the data recorded shall be set out transparently.

## 3. Duties

### 3.1 Chief Executive Officer

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The Chief Executive Officer has overall responsibility for driving standards, fleet efficiency, and reducing road risk, on behalf of the Board and the public which the Trust serves.

### **3.2 Organisational Development and Staff Engagement Group (ODSEG)**

The group is directly accountable to the Board and seeks to provide assurance relating to the management and improvement of professional standards, including driving standards.

### **3.3 Professional Standards Group (PSG)**

The group will oversee the Trust's management of professional standards, including driving standards, and shall specifically aim to reduce road risk.

### **3.4 Information Governance Group (IGG)**

The group shall oversee the information governance arrangements relating to the storage and access to data gathered by the DVDMS.

### **3.5 Head of Fleet**

The head of fleet is responsible for the installation and maintenance of the DVDMS within the Trust's fleet, ensuring that the system records uninterrupted data and that all associated documentation is properly maintained. The head of fleet will liaise with police and the Trust's driving standards manager, to provide data as requested, via the governed process, when an adverse event is reported or a collision occurs, to aid investigation. The head of fleet shall always act within Trust policy and national legislation relating to data protection.

### **3.6 Driving Standards Manager**

The driving standard manager's role is to maintain and improve driving standards and to reduce road risk at the Trust. The driving standards manager shall liaise with the head of fleet to access and analyse the data collected by the DVDMS, via the governed process, when an adverse event is reported or a collision occurs, to aid

POL140 – Driver and Vehicle Data Management Policy investigation. The driving standards manager leads the Trust’s collision analysis and support team (CAST) and shall liaise with police on relevant matters. The driving standards manager shall always act within Trust policy and national legislation relating to data protection.

### **3.7 Subject Access Request (SAR) Team**

The SAR team shall receive requests from internal and external stakeholders to access information recorded by the DVDMS. They shall provide the DVDMS data request form found at Appendix B to the requestor and, once received back, forward to those found at Section 4.3 of this policy for approval if the request is in line with the requirements found at Section 4.1 of this policy.

### **3.8 All staff**

All staff have a responsibility to use DVDMS in line with this policy and must not tamper with any of the equipment. Purposeful interference with the equipment may result in being managed under the Trust’s Disciplinary Policy.

## **4. Principles of the Policy**

### **4.1 Purpose of the DVDMS and what it is not**

The two main purposes of the DVDMS are:

1. To manage the Trust’s fleet efficiently and effectively.
2. To reduce road risk and improve driving standards.

#### *Fleet management*

To manage the Trust’s fleet efficiently and effectively, the DVDMS shall be used to:

- Show current and historic vehicle positions and journeys for operational purposes i.e. available fleet.
- Monitoring vehicle efficiency for cost effective fleet management and reduction of carbon emissions.

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- Monitoring and diagnosing vehicle faults.
- Enable the Trust’s statutory obligation to identify a driver and distribute Notices of Intended Prosecution (NIP).

A full list of metrics gathered by the DVDMS can be found at Appendix A.

### *Reducing road risk and improving driving standards*

To reduce road risk and improve driving standards, the DVDMS shall be used to:

- Analyse vehicle and driver behaviour preceding an adverse event or collision, to inform an investigation.
- Correlate data gathered with CCTV imagery collected by Trust vehicles, where available.
- Learn from incidents where harm or injury is caused, or where a near miss occurred.
- Build thematic data to inform driver training and updates, tailoring communication and engagement to actual data gathered.
- Utilise fleet data to inform staff of emergent risk.

### ***What DVDMS is not***

DVDMS is not a surveillance or monitoring system designed to punish staff. DVDMS data shall not be routinely accessed, and will only be accessed to undertake fleet management, or to inform an investigation when an adverse event has occurred, or a concern has been raised by an internal or external stakeholder. All requests for access to the data held by the system shall be authorised via a governed procedure to prevent misuse of the system.

Where, through appropriate use, it is identified that a staff member has contravened road law, corrective action shall be taken by the Trust. This does not necessarily mean disciplinary action and may constitute retraining.

In line with just culture, should road law be contravened despite corrective actions being attempted previously, this may result in



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disciplinary action being taken by the Trust or a referral to the police.

## 4.2 Operation of the system

The system will be administrated and managed in line with the principle of this policy. Only those who have been suitably trained to access and interrogate the system shall be permitted to do so. Any person accessing the system shall be bound by Trust policy and national legislation relating to data protection. If part of the system becomes inoperable, this must be reported immediately to the head of fleet for investigation and resolution.

Currently, there is no method to automatically identify the driver of the vehicle.

The Trust's aspiration is to provide all staff who drive Trust vehicles their own unique DVDMS-compatible identification card. These cards must always be carried to identify themselves as well as to log-on to the vehicle they are driving.

Once implemented, driving the vehicle without logging on shall sound an alert tone for one minute at which point the driver will be logged as 'unknown'. Failure to log-on shall generate an exception report for investigation.

## 4.3 Access to the hardware and software (data), including the process to access data

Access to the DVDMS shall be limited to members of staff who require to interrogate and analyse data, as well as those responsible for the maintenance of the system.

Predominantly, this shall be the head of fleet and the driving standards manager. Access to the system shall be obtained via a password which meet the Trust's security criteria.

To access data, there must be a clear indication that the data is needed. At the point of writing this policy, the internal reasons permitted to access data are as follows:

- Any reason listed in the fleet management list in section 4.1.

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- Any reason listed in the reducing road risk and improving driving standards list in section 4.1.

DVDMS data shall not routinely accessed, and will only be accessed to undertake fleet management, or to inform an investigation when an adverse event has occurred, or a concern has been raised by an internal or external stakeholder.

Data may also be requested from an external source such as in the following circumstances:

- An external subject access request is received and deemed appropriate to release data, such as a request from the police to assist in an investigation.
- Under data protection law, an individual has the right to view any personal held about them by an organisation. In these circumstances, all requests must be made to the Trust's subject access request team.

All requests to access data shall be considered on their individual merit and must be requested via the subject access request (SAR) team if personal data is included, using the form found at Appendix B. The request shall be reviewed and, if an appropriate request, further authorised by either:

- Head of fleet
- Driving standards manager
- Head of quality improvement and professional standards
- Deputy clinical director

Two members of the above list must authorise the access to the data. See Appendix C for the full process for requesting data.

All requests to access data shall be stored and a summary shall be provided to the IGG at each cycle for oversight and challenged appropriately at the meeting.

Trends and themes identified by data analysed shall be monitored and appropriate actions set and overseen through the PSG.

### 4.4 Raising driving concerns

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Concerns about a staff member's driving can be raised by internal and external stakeholders. The Trust has a duty to follow due diligence when safety concerns have been raised.

A concern about a driver's behaviour in the first instance should be raised directly with the driver at the time of the concern being identified or as soon as safely possible afterwards.

Should this not be successful, the concern can be escalated to the staff member's line manager. The line manager can request an independent review of the DVDMS data by completing the data request form found at Appendix B. The process to authorise, access, and analyse the data is documented at Section 4.3 of this policy.

Should the concern not be founded upon inspection of the DVDMS data, and it is deemed a vexatious complaint, the individual who raised it may be managed under the Trust's Disciplinary Policy.

### 4.5 Maintenance, signage, and fault reporting

All DVDMS devices shall be installed and maintained by Trust employed technicians. The responsibility for this shall be maintained by the head of fleet.

Signs shall be placed so that employees are aware that vehicles are fitted with DVDMS.

All faults with the DVDMS must be reported as soon as it becomes apparent via the Trust's incident management system, Datix. In addition, the Trust's fleet team should be made aware by the DVDMS itself, should any fault occur, which would prevent data being captured. The fleet team shall monitor such faults and arrange necessary repair as soon as is practical.

### 4.6 Training

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Training on the use of the system shall be given to those authorised to access it. This can be requested through the head of fleet. The training shall consist of how to access the system and the requirements of Trust policy and national legislation relating to data protection.

### 4.7 Data storage

The DVDMS is always live. Data is recorded each second and this is sent to a secure sever for storage. Only authorised personnel shall be able to access the server within the agreed and governed process.

Data is stored on the secure server for the operational life of the vehicle it relates to and then archived for a further 15 months following the vehicle is decommissioned. After this period, the data is destroyed.

## 5 Governance

This policy shall be monitored through the most appropriate governance groups within the Trust's governance structure.

At the time of writing, primarily, the IGG shall monitor the access to and storage of data gathered and recorded by the DVDMS.

The PSG shall oversee the trend and theme analysis of data gathered through the DVDMS, setting, and overseeing completion of, any associated actions required.

Any misuse of the DVDMS (which is deemed breach of this policy, use of data outside of the principles of this policy, or use of the DVDMS not in the spirit of improvement and risk reduction) may be managed in line with the Trust's Disciplinary Policy.

## 6 Policy Review

As this is a new policy, it shall be reviewed one year after its inception. Following the first review, the policy shall be reviewed every three years to ensure its currency.

## Appendix A – Metrics Recorded by the DVDMS

**GPS** – date, time, latitudinal position, longitudinal position, speed, heading, fix indicator, number of satellites used, horizontal dilution of precision (HDOP), vertical dilution of precision (VDOP).

**Low-G accelerometer** – x, y & z values

(Note High-G accelerometer x, y & z plus gyro x, y & z values are monitored and will be recorded in the event of a collision)

**CANbus data** – odometer, RPM, speed, ignition, cranking, handbrake, accelerator pedal position, sidelights, dipped beam, main beam, front fog lights, rear fog lights, brake lights, reverse lights, left indicator, right indicator, coolant temp, ambient temp, OSF door, NSF door, side door, rear door, OSF seatbelt, MIL warnings (engine, braking system, emissions, coolant system, oil system, oil temp, oil level), VIN, vehicle type.

**Genisys data** – battery link, headlamp flash, body blues, chassis battery low, heater, climate control, aux battery low, side door, comms battery low, engine running, lightbar front blues, fire trace low pressure, fire trace fault, saloon lights, 999 mode, arrive scene, panic strip, reverse alarm, grille/wing blues, lightbar rear blues, incubator feed, defib power, shoreline connected, tail lift stowed, ignition, siren power, rear reds, fire trace deployed, tail lift battery low.

**GPIO** – up to 8 digital inputs (e.g. siren sounding etc), 2 analogue inputs (battery voltages).

## Appendix B – Access to Data Form

### Driver and Vehicle Data Management System

#### Data Request

Person / organisation requesting data:

Internal / External (delete as applicable)

Reason for request (refer to Section 4.1 of this policy for permitted reasons):

Name of driver (if known):

CAD number (if known and applicable):

Call sign (if known):

Vehicle base station (if known):

Location of incident (if known):

Further details of concerns (if applicable):

Requestor signature:

Requestor name:

Requestor job title:

Requested date:

Approver signature:

Approver name:

Approver job title:

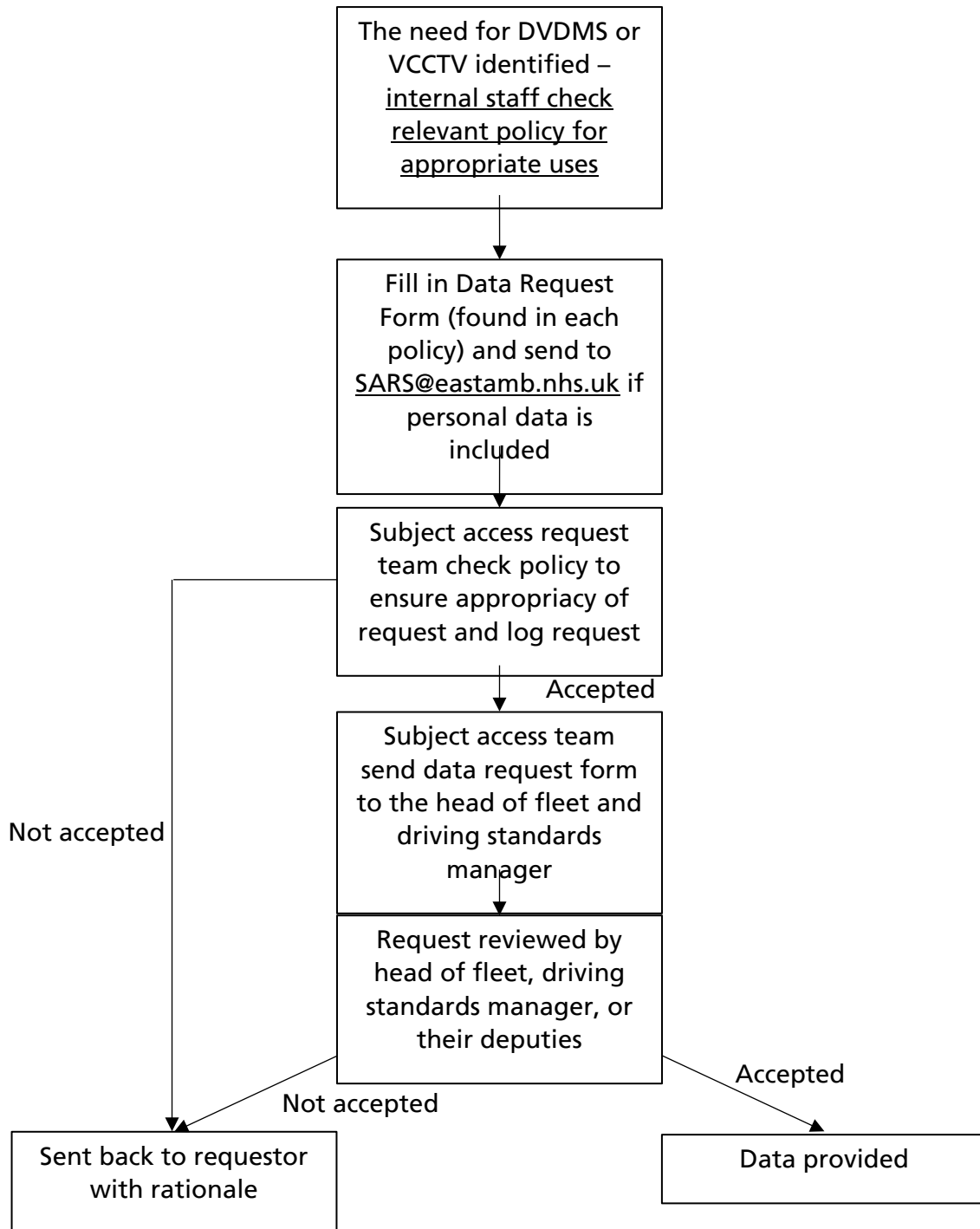
Approved date:

Data supplied date:

If not approved, reason why:

Not approved date:

## Appendix C – Data Request Process



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**Appendix D – Monitoring Table**

What	Who	How	Frequency	Evidence	Reporting arrangements	Acting on recommendations	Change in practice and lessons to be shared
Version control and review date	Head of Quality Improvement and Professional Standards	Leading on review of policy when appropriate to do so	As per review date or as required if significant change in process	Updated documents to be passed through appropriate governance groups until signed off	Through PSG/IGG and to CRG	PSG/IGG and CRG	Policy to be published on East24 when approved and any significant changes in process communicated with all interested stakeholders



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What	Who	How	Frequency		Reporting arrangements	Acting on recommendations	Change in practice and lessons to be shared
Thematic review of data held in DVDMS	Driving Standards Manager	Collation of data used in investigations	Ad hoc	Presentation to appropriate groups when themes found	Through PSG/IGG and to CRG	PSG/IGG and CRG	As required

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**Appendix E – Equality Impact Assessment**

<b>EIA Cover Sheet</b>																					
Name of process/policy	Driver and Vehicle Data Management Policy																				
Is the process new or existing? If existing, state policy reference number	New																				
Person responsible for process/policy	Head of Quality Improvement and Professional Standards																				
Directorate and department/section	Clinical Quality																				
Name of assessment lead or EIA assessment team members	Ant Brett																				
Has consultation taken place? Was consultation internal or external? (please state below):	Yes. With trade unions and internal stakeholders.																				
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	X																				
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Other (please state) Training programme.																					

## POL140 – Driver and Vehicle Data Management Policy

### Equality Analysis

What is the aim of the policy/procedure/practice/event?

To manage EEAST fleet efficiently and to improve driving standards. Document the use of DVDMS.

Who does the policy/procedure/practice/event impact on?

<b>Race</b>	X	<b>Religion/belief</b>	X	<b>Marriage/Civil Partnership</b>	X
<b>Gender</b>	X	<b>Disability</b>	X	<b>Sexual orientation</b>	X
<b>Age</b>	X	<b>Gender re-assignment</b>	X	<b>Pregnancy/maternity</b>	X

Who is responsible for monitoring the policy/procedure/practice/event?

Head of Quality Improvement and Professional Standards and via Trust governance arrangements.

What information is currently available on the impact of this policy/procedure/practice/event?

New policy – no information available.

Do you need more guidance before you can make an assessment about this policy/procedure/practice/event?

No

Do you have any examples that show that this policy/procedure/practice/event is having a positive impact on any of the following protected characteristics?

No

Are there any concerns that this policy/procedure/practice/event could have a negative impact on any of the following characteristics?

No

**Action Plan/Plans - SMART**

N/A

**Evaluation Monitoring Plan/how will this be monitored?**

N/A