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Vehicle Telematics Procedure

Purpose

The purpose of this document is to describe the management, operation, and use of the Vehicle Telematics System (VT) in Public Health Wales (PHW) Fleet Vehicles. VTs are used extensively in commercial fleets and will allow PHW to identify areas for environmental benefits to be made through improving efficiency whilst also providing safety improvements for all stakeholders.

Linked Policies, Procedures and Written Control Documents

[All corporate policies and procedures are available on the Public Health Wales website](#)

- Safe Driving at Work Policy
- Health and Safety Policy
- Counter Fraud and Corruption Policy
- Lone Working Policy

Scope

This procedure and any arrangements made under it applies to:

- all persons employed or engaged by Public Health Wales, including part time workers, temporary and agency workers and those holding honorary contracts, as well as the staff that monitor, review, and maintain the VT and the information that it produces.

Equality and Health Impact Assessment

An Equality, Welsh Language and Health Impact Assessment has been completed and can be viewed on the policy webpages.

Approved by

Leadership Team

Approval Date

30 April 2025

Review Date

30 April 2028

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Group with authority to

Leadership Team

| | |
|---|--|
| approve supporting policies and procedures | |
| Accountable Executive Director/Director | Fu-Meng Khaw National Director of Health Protection and Screening Services, Executive Medical Director / Cyfarwyddwr Cenedlaethol Gwasanaethau Diogelu Iechyd a Sgrinio a Chyfarwyddwr Meddygol Gweithredol |
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Disclaimer

If the review date of this document has passed please ensure that the version you are using is the most up to date either by contacting the document author or [Board Business Unit](#).

Summary of reviews/amendments

| Version number | Date of Review | Date of Approval | Date published | Summary of Amendments |
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| 1 | | 30/04/25 | 14/05/2025 | New procedure developed |
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1 Purpose

The purpose of this document is to describe the management, operation, and use of the Vehicle Telematics System (VT) in Public Health Wales (PHW) Fleet Vehicles. VTs are used extensively in commercial fleets and will allow PHW to identify areas for environmental benefits to be made through improving efficiency whilst also providing safety improvements for all stakeholders.

Please note: PHW Vehicles are used for work purposes only and are not used outside of work/private use.

2 Scope

This document applies to all persons employed or engaged by Public Health Wales, including part time workers, temporary and agency workers and those holding honorary contracts, as well as the staff that monitor, review, and maintain the VT and the information that it produces.

3 Aims and Objectives

3.1 Aims

PHW has an obligation, under law and its environmental objectives and targets, to reduce carbon emissions. It is also our aim to reduce the overall level of road traffic collisions and property damage, which may affect PHW and its stakeholders, whilst improving employee and public perceptions of safety within PHW, including the duty of care to staff.

Public Health Wales VT will help:

- Improve fuel consumption.
- Ensure that vehicles are maintained correctly.
- Improve and maintain the safety of employees and other stakeholders.
- Prevent incidents.
- Reducing potential for fraudulent claims

This list is not exhaustive and may expand with system developments. Any information captured by the VT shall only be used for the purposes as defined in this document.

The primary use of VT is to ensure that vehicles driven by PHW staff are being operated efficiently and safely. It will also help to protect drivers in the event of false allegations. This will be done via a system of scoring in the VT web portal. Drivers with a unique identifier will be allocated a score based on Relative Speed and Driving Style.

4 Vehicle Telematics System

4.1 Operation

Due to the PHW Fleet sitting within Screening Division, the VT will be administered and managed by the Diabetic Eye Screening Wales (DESW) Technical and Operational Support Manager and Wales Abdominal Aortic Aneurysm Screening Programme (WAAASP) Programme Manager. Both will seek guidance from Information Governance where required in accordance with the principles and objectives expressed in this document.

Operating the VT will be restricted to only those who have been suitably trained and authorised. This will include specific access levels and may include managers and other staff members as authorised.

4.2 Scoring

The vehicle tracking system evaluates drivers daily, assigning scores based on their driving performance, with speed being one of these factors. These scores are colour-coded, allowing users to easily identify who is driving well and who needs training. The driving score is calculated by looking at acceleration and braking and monitors the speed of the vehicle per second. It will then calculate: the frequency of speed changes per hour by more than a given amount between one second and the next, the severity of the changes, and the duration the vehicle has been driving.

It includes a driving style league table which is a useful tool for assessing driver performance across the entire fleet. Drivers with low scores are easily identifiable, allowing those responsible for monitoring, to pinpoint drivers who need observation. This provides an additional benefit of being able to examine the correlation between low scores and high vehicle maintenance or excessive fuel costs.

This system evaluates all drivers equally, regardless of the vehicle they operate.

The driver scores provided by the VT web portal will be reviewed monthly by the Technical and Operational Support Manager / Programme Manager and data will be shared, internally, within the DESW and WAAASP Local Management Team (LMT) meetings. There are no specific targets in terms

of what scores drivers should aim to achieve; if the speed and driving style score are in the green then there is no cause for concern.

Any incidences of 'red' scores will be treated as an anomaly and will only be reviewed further when this level of driver performance has been sustained for a period (2+ weeks).

Any specific data identified as part of a further review will only be shared with the driver and their line manager.

4.3 Data capture outside of business as usual

As part of any investigation following an alleged or actual road traffic collision or offence, the following information will be recorded:

- The date and time of incident
- The vehicle Telematic data set
- The name of the person logging into the website/system
- The reason for viewing and requesting the information.

4.4 Retaining information

Data will be available on the VT web portal for a period of 12 months where we can request an annual report in excel of all trips/mileage/hours/location. The system allows all data to be held live on the system for the 12 months, after which the storage allows up to 7 years for archived data, providing no incident reports or requests for data have been received. PHW can request to reduce that time if required.

4.5 Access to data

Much of the data captured by the VT system will be the personal data of the member of staff driving or responsible for the vehicle in question and will therefore require compliance with data protection legislation to be considered. Access to data under 4.2 above will only be granted to staff who have a legitimate requirement for such access.

Staff will be entitled as data subjects to formally make a request to exercise their rights under data protection legislation, including access to such data. All such requests must be referred to the Information Governance Service. Further information on how staff can exercise these rights can be found in the organisation's [staff privacy notice](#).

Data gathered through the system will also fall under the Freedom of Information Act and so can be requested by anyone. Any such requests for data from the system must be referred to the Information Governance Service.

Access to data may also be obtained in connection with civil disputes by Court order or extended to lawyers acting for defendants or victims in connection with criminal proceedings. Again, any such requests must be referred to the Information Governance Service (in coordination with the Fleet Managers) who will review requests in line with the purpose and objectives of the scheme and in accordance with this Procedure.

4.6 Police access to data

In certain circumstances, Police may apply for access to VT data where they reasonably believe that access is necessary for the investigation and detection of a particular offence or offences, the prevention of crime or it is in the vital interests of a person or persons.

Requesting of VT data must be made in writing to the Information Governance Service on the appropriate form (held by Policy Services) and should clearly state the purpose of the request including how failure to disclose would prejudice the stated purpose.

The Head of Information Governance is responsible for ensuring all requests are responded to in a timely manner. Such requests will normally be approved unless there are concerns in which case the matter will be referred to the Senior Information Risk Owner. It should be noted that if a request is refused, the Police, in some circumstances, can apply for a Court order requiring PHW to release the information.

4.7 Disciplinary procedure

Data will not be routinely accessed for any other purpose other than for the purposes of producing anonymised reports as set out in this document. Unless there is a clear, transparent, and lawful reason to do so by specific request, no data should be used for any purpose other than reporting and ensuring the health safety and wellbeing of staff e.g. lone working.

Staff must be aware, however, that in the event of an allegation of misconduct, a lawful request for access by the Police or in response to a court order, information may need to be disclosed and any resulting breaches may lead to disciplinary action where appropriate. In such circumstances the People & OD Teams will be contacted before such a disclosure is made.

5 Counter Fraud

PHW is committed to taking all necessary steps to counter fraud, bribery, and corruption within the organisation. Staff should report suspected incidents of fraud and corruption to the [Counter Fraud Service - NHS Wales Shared Services Partnership](#)

Alternatively, staff may contact the confidential NHS Fraud and Corruption Reporting line on 0800 028 40 60; or use the on-line reporting facility - [Report NHS fraud | Help fight fraud](#) within the NHS | Report your fraud concerns and suspicions using a confidential online form (cfa.nhs.uk)

6 Training and implementation

Appropriate Managers and Supervisors will receive training on the VT as required.

7 Audit and Monitoring

The procedure will be part of the Public Health Wales auditing process to ensure that it:

Has been implemented effectively.

Is fit for purpose.

Is being complied with.

The frequency of the monitoring arrangements is the responsibility of the Fleet Managers, and they will produce monthly statistics to reflect compliance and effectiveness.

This document will be reviewed every 3 years as per Public Health Wales document control procedures.

8 Responsibilities

The following teams will be responsible for implementing this procedure:

- Screening Division
- DESW Head of Programme
- Information Governance