Fleet Telematics Policy

Using Vehicle Tracking and Driver Behaviour Data

Rev **1** Issued April 2024

Managing Director - Kevin Hague



1 POLICY STATEMENT

1.1 Aarsleff Ground Engineering Ltd, Centrum Pile Ltd and Cannon Piling (the Company) 1.1 This policy applies to all companies within Aarsleff Ground Engineering Ltd UK and Avoncross Ltd, including companies trading as Centrum Pile and Cannon Piling (referred to in this statement as 'The Company').

1.2 This policy is non-contractual and the Company reserves the right to amend or withdraw the policy at any time at the Company's discretion.

1.3 The Company has a fleet of Vehicles and Plant with fitted vehicle technology and telematics that are required to assist in delivering a range of services. It is recognised that driving is one of the most hazardous work activities undertaken by employees and contributes to carbon emissions and a reduction in air quality. This policy supports the Companies Sustainability and Environmental agenda.

1.4 The implementation of telematics and driver behaviour tracking will support the Company in achieving its aim of providing a safe, efficient and environmentally friendly fleet.

1.5 This policy sets out the general principles for the use of the Tracking System for telematics equipment in our vehicles and plant.

2 DEFINITIONS

2.1 Vehicle technology and telematics are defined as systems employed within branded Company vehicles to measure and record data relating to the use of vehicles and service provision and include:

2.2 Vehicle telematics

2.3 In cab technology

3 SCOPE

3.1 This policy applies to:

3.1.1 All branded fleet operated by the Company.

3.1.2 All employees, Sub-contractors and Agency who operate and drive branded fleet vehicles operated by the Company.

3.1.3 This policy does not apply to employees who use their own vehicles on Company business, or Company Car users.



4 ROLES AND RESPONSIBILITIES

4.1 In addition to general roles and responsibilities set out in the Company Handbook, the following specific roles and responsibilities and defined:

4.1.1 Managers at all levels are responsible for ensuring that employees who operate/drive fleet vehicles understand how to operate the equipment, if required and how the information generated will be used. Line Managers are also responsible for ensuring that employees comply with this policy.

4.1.2 Employees are responsible for ensuring they comply with this policy and utilise the equipment provided appropriately.

4.1.3 Misuse of / tampering with the equipment, or use of other devices or process' to prevent the equipment from working correctly may be investigated under the Disciplinary Policy.

4.1.4 Breaches of this policy may be investigated under the Disciplinary Process.

5 PRINCIPLES

5.1 The Company will use vehicle technology and telematics devices and the information they provide for the following purposes:

5.1.1 Providing information on who is responsible for a vehicle at all times

5.1.2 Providing information on driver behaviour to improve safety

5.1.3 In circumstances involving Road Traffic Accidents (RTA`s) this information will also assist in protecting the Company and its employees from claims arising from such incidents.

5.2 If any poor practice or misconduct is observed through analysis of the system, Management will be made aware of any concerns that have been identified. Management are then expected to make the employee aware of any concerns, and provide the employee with an opportunity to express their viewpoint before any decision to further action is reached e.g. training

6 MAINTENANCE, STORAGE, HANDLING AND ACCESS TO RECORDS

6.1 Some of the information recorded by the vehicle technology and telematics equipment is considered to be personal data under GDPR as it allows anyone accessing the system to identify an individual driver and their behaviour

6.2 The use of the vehicle telematics system, its functionality, and the information it holds must be proportionate, transparent and reasonable. Driver data on the operation of a specific vehicle will only be used for the purposes listed in section 5.1 above.

6.3 Personal data must be processed in accordance with GDPR.



6.4 The data recorded by the vehicle telematics system will be managed sensitively to help provide management information about vehicle use for insurance claims, legal proceedings and if necessary, resolve any complaints or allegations made against the Company or its employees.

6.5 The Directors will be responsible for approving or rejecting requests to access this information when a complaint has been made or a serious incident has occurred and there is a need to investigate.

6.6 General information and trends will be monitored and reported on to inform strategies to reduce carbon emissions, improve air quality, reduce costs and help to reduce occupational road risk.

6.7 Typical data that will be monitored and reported on includes but is not limited to:

- 6.7.1 Vehicle position and location
- 6.7.2 Vehicle speed
- 6.7.3 Harsh vehicle acceleration
- 6.7.3 Harsh vehicle braking
- 6.7.4 Vehicle engine idling time

6.8 The data can be requested at any time and reports will be generated monthly by the HR Team.

6.8.1 Providing additional protection to employees by assisting the management of occupational road risk to meet our Health and Safety responsibilities

6.8.2 Reducing carbon emissions and improving air quality

6.8.3 Helping to plan the logistics and vehicle utilisation for the provision of effective services

6.8.4 Reducing costs associated with the maintenance of vehicles

6.8.5 Reducing costs associated with fuel consumption

6.8.6 Assisting with the location of vehicles that have broken down or been stolen Recording drivers' hours to provide evidence of compliance with the Road Transport Directive

6.8.7 Helping to safeguard employees against vexatious complaints and allegations

6.8.8 Assisting in work planning – planning routes and schedules, reducing `dead` mileage, knowing which vehicle is closest to a project site, making the best use of vehicles etc.



7 USE OF RECORDS

7.1 If the data has been reviewed in accordance with points 6.4 and 6.6 above, an employee will be made aware of any concerns the use of technology and telematics has identified and be provided with an opportunity to express their viewpoint before any decision as to further action are reached and will follow HR guidelines.

8 IMPLEMENTATION AND REVIEW OF THE POLICY

8.1 The policy is operational from date of approval.

8.2 The Directors reserve the right to review, amend or change this policy at any time.

