

City of Mississauga

# Corporate Policy & Procedure



**Policy Title:** Appendix 1 - 2021 10 21 - clean copy - draft GPS in Vehicles Policy.docx

**Policy Number:** [Policy No.]

**Draft Only – Clean Copy – October 21, 2021**

Section:	<b>Corporate Administration</b>	Subsection:	<b>Technology</b>
Effective Date:	[Effective Date]	Last Review Date:	[Last Review]
Approved by: <a href="#">Click here to enter text.</a>		Owner Division/Contact: For additional information on Telematics/ GPS equipment contact the applicable divisional director. For more information related to the Municipal Freedom of Information and Protection of Privacy Act, contact the Legislative Services, Corporate Services Department.	

## Policy Statement

Telematics/Global Positioning System (GPS) devices are installed in specific City of Mississauga (the “City”) owned, leased or contracted on-road vehicles and critical off-road equipment, as determined by the City.

## Purpose

The use of Telematics/GPS devices is an effective means of ensuring the optimal efficiency and safety of City employees and members of the public. The need to ensure optimal efficiency and safety must be complemented by responsible and efficient management of the data generated by these devices and systems. The purpose of this policy is to establish procedures which are intended to achieve this balance.

Specifically, this policy addresses requirements and responsibilities with respect to:

- The installation and operation of Telematics/GPS devices in designated Fleet Vehicles and Fleet Equipment, including the collection of information by the Telematics/GPS System
- The use of the information obtained through Telematics/GPS devices and the Telematics/GPS System, and
- Custody, control, access to and retention of information obtained through the use of Telematics/GPS devices and the Telematics/GPS System

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## Scope

This policy applies to all City-owned, leased or contracted on-road vehicles and off-road vehicles and equipment equipped with Telematics/GPS devices and to all union, and non-union employees and contractors. City-owned Vehicles with Telematics/GPS devices installed are identified with a decal.

## Excluded from Scope

Vehicles and/or equipment operated by Mississauga Fire and Emergency Services and MiWay are excluded from this policy.

## Related Policies

[Data Handling](#) - All City of Mississauga Data will be handled, classified and security-controlled in accordance with the criteria defined in this policy.

[Open Data Program](#) - The City of Mississauga is committed to the principles of open and transparent government. Telematics/GPS data, in a form satisfactory to the Open Data Program Policy, may be published as Open Data.

[Access and Acceptable Use of Information Technology Resources](#) - The City provides access to various types of Information Technology Resources for business purposes and expects that all Information Technology Resources will be used appropriately and in accordance with this policy.

## Legislative Authority

Section 11(1) of the *Municipal Act*, 2001 provides the City with the authority to collect Telematics/GPS data. This policy also reflects the provisions of the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA), as amended. Refer to Corporate Policy and Procedure – Freedom of Information and Protection of Privacy for general information regarding this Act.

## Definitions

For the purposes of this policy:

“City” means the Corporation of the City of Mississauga.

“Fleet Vehicles” or “Vehicles” means all City-owned or operated on-road licensed light, medium and heavy-duty vehicles, including contractor vehicles, and includes but is not limited to cars, trucks and trailers.

“Fleet Equipment” or “Equipment” means all City-owned or operated units, including contractor equipment, and includes but is not limited to non-licensed off-road equipment, riding lawn mowers, tractors, backhoes/loaders, Auxiliary Power Units and other auxiliary equipment (e.g. tractor attachments).

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"Record" means recorded information/data in any format or medium that documents the City's business activities, rights, obligations or responsibilities or recorded information that was created, received, distributed or maintained by the City's staff in compliance with a legal obligation.

"Service Level Agreement" ("SLA") means the contract that sets out the terms of service delivery for the provision of services between the client department and the service provider.

"Telematics/GPS Devices" means the devices physically installed in Vehicles and Equipment that collect GPS data (including location, position, heading) and telematics data (including speed, RPM, fuel consumption) and transmits that data over the wireless communications network to servers, where it is processed and can be viewed in a web-based portal.

"Telematics/GPS System" or "System" means the satellite based technology of sending, receiving and storing information using telecommunication devices in Vehicles and Equipment. The GPS component provides Vehicle and Equipment location, date and time information. Telematics/GPS Devices also connect to, and gather data from, the onboard computing systems within vehicles.

"Transitory Records", in accordance with the Records Retention By-law, as amended, means records of temporary usefulness that are not integral to an administrative or operational record series, and are only required for a limited period of time to complete a routine action or prepare an ongoing record.

"Vehicle and Equipment Operator" means all City employees and contractors who operate Fleet Vehicles and/or Fleet Equipment.

## Objectives

The objectives of implementing the use of Telematics/GPS Systems are to:

- Optimize technology to analyze Vehicle performance and Vehicle conditions to achieve productivity improvements (e.g. planning, productivity analysis for route optimization/route planning and route completion; number of Vehicles required)
- Protect and manage the City's assets
  - reduce asset depreciation rates by using Telematics/GPS to schedule regular Vehicle maintenance
  - achieve better fuel efficiency
  - locate and retrieve Vehicles and Equipment (e.g. in case of theft)
- Analyze Vehicle and Equipment Operator performance for the purpose of improving safety, asset protection, workforce management and productivity
- Ensure that vehicles are operated within safety parameters and in compliance with all traffic regulations

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- Enhance Vehicle and Equipment Operator safety (e.g. activation of emergency protocol/ location identification if “failure to respond”)
- Reduce unnecessary idling to align with the City’s environmental stewardship and assist in reducing greenhouse gas (GHG) emissions
- Ensure service level targets are being met
- Enhance the ability to communicate service levels to the public (e.g. via web based mobile applications)
- Respond to public concerns regarding service levels and/or to validate a complaint regarding Vehicle and Equipment Operator conduct
- Provide additional data related to the use of materials, and
- Respond to insurance claims made against the City

## **Accountability**

### **Divisional Directors**

All applicable divisional directors are accountable for:

- Ensuring all applicable managers/supervisors are aware of this policy and any related protocols, as well as any subsequent revisions, and
- Ensuring compliance with this policy

### **Fleet Services**

Fleet Services is accountable for:

- Determining which Vehicles and/or Equipment Telematics/GPS devices will be installed in, in consultation with the applicable manager/supervisor
- Providing the Telematics/GPS hardware, including the initial deployment and/or removal of the standard Telematics package, based on the applicable fleet’s operation
- Ensuring access to the System is only granted to the managers/supervisors defined by the applicable SLA or who have a legitimate need to access the System
- Approving, managing and removing access to the Telematics/GPS System for applicable staff, as requested by managers/supervisors
- Ensuring that all System Equipment and Devices are securely stored in a controlled access area
- Ensuring that Telematics/GPS Devices are operational and that issues are reported to the applicable manager/supervisor; and
- Ensuring the collected data is available and accessible to the departments/divisions, in accordance with and in compliance with this policy

Note: All Telematics/GPS equipment installed in contracted vehicles remains the property of the City.

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### **Managers/Supervisors**

Managers/supervisors are responsible for:

- Ensuring applicable staff are trained on this policy and any related protocols or procedures, as well as any subsequent revisions, with respect to their specific job function
- Ensuring employees acknowledge completion of training and for maintaining training records
- Ensuring all employees comply with this policy and follow any related protocols or procedures, including responsibilities with respect to protection of privacy and confidentiality
- Advising Vehicle and Equipment Operators in advance of the installation of Telematics/GPS Devices in Vehicles or Equipment assigned to or used by them
- Periodically reviewing System data to ensure safe operation of Vehicles and Equipment, in accordance with the *Highway Traffic Act*, and to ensure safeguarding of City assets
- Advising Fleet Services of any issues related to the System and/or Devices
- Not accessing, using or disclosing the System for personal reasons and/or interfering with the Telematics/GPS Device and its operation
- Maintaining custody, control and security of all Transitory Records from creation through to final disposition, and
- Approving, managing and removing access to the Telematics/GPS System for applicable staff, as required

### **Employees with Access to Telematics/GPS Systems**

Employees with access to Telematics/GPS Systems are responsible for:

- Reviewing this policy and/or attending training related to this policy, as required
- Complying with this policy in performing their duties and functions related to the operation of the System
- Not accessing, using or disclosing the System for personal reasons and/or interfering with the Telematics/GPS Device and its operation
- Never sharing their login credentials
- Protecting the privacy of individuals with respect to personal information under MFIPPA, and
- Immediately informing their manager/supervisor of any unauthorized access, use and/or disclosure of Telematics/GPS System data

### **Vehicle and Equipment Operators**

Vehicle and Equipment Operators are responsible for:

- Reviewing this policy and/or attending training related to this policy, as required
- Complying with this policy in performing their duties and functions related to the operation of Vehicles and Equipment, and
- Adhering to all procedures related to the operation of Vehicles and/or Equipment (e.g. log in and out; schedules; Vehicle and Equipment handling, including not interfering with the Telematics/GPS Device and its operation)

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## Data Collected

The City will collect the following Vehicle and Equipment data:

- Vehicle information from on-board computers and sensors, including the Vehicle identification number
- Date, time and geographic location in real time
- Engine status, including ignition on/off events, stop and start times and idling time, and
- The operating behaviour of Vehicle and Equipment Operators, including but not limited to: non-business use, inefficient routing, speeding, harsh braking, acceleration and cornering

Additional data may be collected for Vehicles and Equipment, including but not limited to:

- PTO (power take off) engagement
- Plow position (up or down)
- Air and road temperature
- Material spreader controller data (spread rates, such as salt/liquids)
- Driver identification, pre-trip inspection reports and Hours of Service logs, and
- User logs

Note: The data from Telematics/GPS Systems is stored by a third party provider; however, is wholly owned by the City.

## Use and Disclosure of Data Collected

The data collected through Telematics/GPS System and Devices will be used only:

- To meet the Objectives outlined in this policy
- To provide law enforcement agencies with evidence related to an incident under investigation
- To respond to a request for information under MFIPPA
- To aid in the investigation of an insurance claim filed against the City
- To investigate an incident or allegation of Vehicle and Equipment Operator misconduct, and
- As required by law

Note: The public will have the ability to download an application to their mobile device to access Winter Operations updates. The data will not display Vehicle and Equipment Operator information.

## Access to Telematics/GPS Data

### Access Restrictions

Access to Telematics/GPS System data is limited to:

- Authorized managers/supervisors
- Individuals responsible for the operation or administration of the System, including the Fleet Business Improvement Specialist

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- Employees identified by client groups who manage the System, analyze the data, track information for the Commercial Vehicle Operator's Registration (CVOR) system, conduct investigations and generate reports
- Individuals who have a need to access the information for one of the purposes listed in the "Use and Disclosure of Information Collected" section of this policy, and
- Individuals whose request for access under MFIPPA has been granted

Authorized staff will be able to access data through automated email/SMS alerts, weekly summary reports and by logging into their customized dashboard using their City login credentials.

### **Data Access Procedures – Requests from Other Sources**

System data will only be provided, at the City's discretion, to those demonstrating a legitimate need to review the data. An access request for System data must be completed and submitted to the applicable director. In making a determination to provide access, the director may consult with Legal Services.

When access to the Telematics/GPS System data is provided, the following information will be logged for audit purposes:

- The date and time at which the data was requested and provided
- The identification of the party who requested the System data
- The director approving the provision of System data
- The reason for sharing System data
- The extent of the data that was shared, and
- Provisions for the return of the data and/or its destruction

## **Data and Records Management**

### **Retention of Telematics/GPS Data**

The data collected through the Telematics/GPS System will be retained in accordance with Corporate Policy and Procedure – Corporate Records Management Program and for the period specified in the City of Mississauga's Records Retention By-law 0097-2017, as amended, unless special circumstances warrant retention for a longer period of time (e.g. where a Vehicle has been involved in an accident and there are claims against the City).

### **Unauthorized Access, Use and/or Disclosure**

Any unauthorized access, use and/or disclosure of Telematics/GPS System data is cause for disciplinary action, up to and including termination of employment.

If a privacy breach occurs, the manager/supervisor will inform the System Administrator and the Access and Privacy Officer and together they will take all necessary actions to stop and contain the breach, as well as to investigate and remediate the situation.

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Revision History

Reference	Description
Enter previous review - e.g. GC-1234-2015	Click here to enter text.

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