

Administrative Procedure 580 – Appendix

GLOBAL POSITIONING SYSTEMS PRIVACY

Background

At Edmonton Catholic School Division, protecting personally identifiable information about employees is important to the Division. However, in order to operate our organization, the Division needs to collect, use and disclose certain amounts of employee personal information.

As such, to balance employees' privacy interests with the Division's operational needs, the Division will outline the purpose for the collection of personal information through Global Positioning Systems (GPS) installed in Division vehicles or driven equipment. This Administrative Procedure also outlines how any personal information collected through GPS will be used, disclosed, stored and destroyed to ensure that it is managed in accordance with the requirements of the *Freedom of Information and Protection of Privacy Act* and all applicable laws.

Procedures

1. Purpose for Collection

1.1 Information collected through GPS will be used for the following purposes:

- 1.1.1 Managing workforce productivity;
- 1.1.2 Safety and development;
- 1.1.3 Asset protection and management;
- 1.1.4 Management of service and repair data;
- 1.1.5 Investigations of internal and external complaints or concerns.

2. Information Being Collected

2.1 The GPS systems use a modem located in the vehicle which transmits data to a central application. Division employees who drive GPS-equipped vehicles or equipment do not have the ability to turn the GPS Technology off. The types of information collected by the GPS include, but are not limited to:

- 2.1.1 Vehicle specific identifier associated with vehicle;
- 2.1.2 Location of vehicle;
- 2.1.3 Route of vehicle including distance, time and speed of travel;
- 2.1.4 Start and stop times (including arrival/leaving times from specific locations throughout the day);

- 2.1.5 All start and stop addresses and locations;
- 2.1.6 Ignition status;
- 2.1.7 Idle status;
- 2.1.8 Rapid acceleration;
- 2.1.9 Harsh braking;
- 2.1.10 Service and On-Board diagnostic information.

3. The GPS data is collected and stored by a third-party administrator on behalf of the Division.

4. Uses of Collected Information:

4.1 The Superintendent, Facility Services, shall at all times, have the ability to access any and all data collected by the GPS system, including real-time and historical GPS information (herein after referred to as “GPS data”) available through the secure website, and may delegate that ability to other Division employees when reasonably required to address the purposes outlined below. Without limiting the generality of the foregoing, this authority is herein delegated, in whole or in part, to the Director, Manager(s) or Supervisors of Facility Services, Division automotive mechanics, and any Occupational Health and Safety Manager or Advisor (“Authorized Personnel”). A third-party administrator may also access GPS data when requested to do so on behalf of the Division for the purposes outlined below.

4.2 GPS data will be used for monitoring our fleet of Division vehicles and to monitor the safety of our employees and Division contractors as well as to monitor compliance with Division Administrative Procedures. Pursuant to expectations established in accordance with [Administrative Procedure 580 - Use of Division Owned Vehicles](#), the Division has established normal parameters including in relation to driving speeds, braking and acceleration practices, and idle and travel time. When any of these parameters are exceeded, Authorized Personnel will receive an alert from the GPS system. The receipt of these alerts may prompt Authorized Personnel to access GPS data . GPS data may also be used for the purposes of conducting investigations.

4.3 GPS data will be used for the following purposes:

4.3.1 Managing Workforce Productivity:

4.3.1.1 To locate and route vehicles and employees to job sites in order to improve efficiency and provide better service. This will include providing Authorized Personnel with the ability to determine the real time location and assignment of vehicles.

4.3.1.2 To monitor vehicle use that may identify personal use/stops or other unauthorized vehicle use.

4.3.1.3 To observe vehicles travelling during non-operational hours.

4.3.2 Safety and Development:

- 4.3.2.1 To identify events of driving behaviours such as driving at excessive speeds, harsh braking or harsh accelerations.

4.3.3 Asset Protection and Management:

- 4.3.3.1 In the event of apparent theft, to facilitate recovery of the stolen property.
- 4.3.3.2 To track travel time and distance and compare it to maintenance records.
- 4.3.3.3 To analyze data related to the performance of vehicles to assist with tracking and scheduling of maintenance of the vehicles.
- 4.3.3.4 To provide reports that will help Authorized Personnel identify means of reducing fuel and maintenance costs and any other more efficient use of vehicles. Reports may include information such as time of departure for job site, time of arrival, route used, time of return from job site, stand-by response and personal use.

4.3.4 Investigations:

- 4.3.4.1 To investigate complaints or concerns with respect to the provision of services pursuant to a work request. Such complaints may include:
 - 4.3.4.1.1 Suspicion of inaccurate reporting of arrival/leaving times for service calls;
 - 4.3.4.1.2 Late arrival at work locations; or,
 - 4.3.4.1.3 To conduct workplace investigations into potential or actual breaches of the employment contract or Administrative Procedures.
- 4.3.4.2 To provide data to support accident investigation and analysis.
- 4.3.4.3 To investigate a complaint from a member of the public, Division employee or other third party where the Division has been contacted with specific information regarding a Division vehicle such as:
 - 4.3.4.3.1 Unlawful driving behavior;
 - 4.3.4.3.2 Involvement in an accident;
 - 4.3.4.3.3 A suspected theft of the vehicle;

4.3.4.3.4 Observation of the vehicle parked for extended periods of time at an apparent non-work location;

4.3.4.3.5 Late arrival at a work location.

4.3.4.4 To conduct workplace investigations into potential or actual breaches of the employment contract or Administrative Procedures.

4.3.4.5 When an investigation is required, the review of GPS data is only one source of information in investigations and a full investigation including interviews and review of all relevant information will be conducted in all circumstances. The Authorized Personnel and investigator will have access to the GPS data for this purpose. A third-party administrator may be asked to compile and analyze the relevant data on behalf of the Division. When GPS data is reviewed for this purpose, details of the review will be recorded, including specifics about the time and date of the review, the reason for the review, and the individual who performed the review.

4.3.5 Management of service and repair data:

4.3.5.1 To assist with scheduling servicing to ensure longevity of Division assets;

4.3.5.2 To alert vehicle coordinators of On-Board diagnostic issues through remote interface;

4.3.5.3 To analyze driving habits at time of On-Board fault and assist with diagnostic process;

4.3.5.4 To analyze past On-Board faults that randomly occur.

5. Disclosure of Information

5.1 In the case of an investigation the results of that investigation may be disclosed to the driver, including relevant GPS data. The Division will only disclose the information that is necessary for the purposes of the investigation, and only to the extent that it is reasonable to do so. No other personal employee information collected through GPS will be disclosed outside the Division without the individual's consent unless required by law or permitted by privacy legislation.

6. Storage of GPS Data

6.1 All GPS data will be stored in a secure website. Records which are required to be retained for the purposes of an investigation or legal proceedings will be retained for as long as necessary for the purposes of the investigation or legal proceeding at which time they will be deleted.

6.2 The Division has a contractual agreement with the third-party administrator which ensures that safeguards are in place and that the GPS data is only accessed and used for the

purposes described in that agreement. The third-party administrator is prevented from disclosing the GPS data except in compliance with the agreement.

7. Access to Personal Information

- 7.1 Any employee wishing to access personal data collected through a GPS should make a written request to the Superintendent, Facility Services.