

## SCHOOL DISTRICT NO. 51 (BOUNDARY)

### P O L I C Y

SECTION	TITLE	NO. 1356
<b>GOVERNANCE &amp; COMMUNICATION</b>	<b><u>Global Positioning Systems on District Vehicles</u></b>	

**DATE ADOPTED:** December 14, 2021

**DATE AMENDED:**

#### Scope

This GPS Policy (the “**Policy**”) applies to all School District 51 (“**SD51**” or the “**District**”) employees driving SD51 vehicles, including maintenance vehicles and buses (collectively, the “**Vehicles**”).

#### Purpose

SD51 is committed to ensuring the safety of employees, the protection of its property and the efficiency of its operations. In order to achieve these and related objectives, SD51 may track the location, movement and operation of Vehicles through the use of global positioning system transmitters and related technology (“**GPS**”).

SD51 also takes seriously its obligations to adopt responsible practices regarding the collection, use and disclosure of personal information about its employees and is committed to ensuring that the use of GPS is in full compliance with the *Freedom of Information and Protection of Privacy Act* (“**FIPPA**”).

The purpose of this Policy and related regulations is to provide employees with reasonable and appropriate notice of the use of GPS and to establish guidelines regarding the collection, use and disclosure of personal information of employees obtained under this Policy using GPS (“**GPS Data**”).

### R E G U L A T I O N S

GPS is affixed to Vehicles and its functioning allows for the collection and monitoring of employee location, routes, mileage, speed, hours worked, whether the GPS feature has been disconnected, and irregular driving activities such as harsh acceleration, braking or cornering.

Such information collected using GPS may be used for purposes that include the following:

- i. employee safety purposes;
- ii. facilitating emergency response if required;
- iii. tracking Vehicle location to protect against loss, vandalism or theft;

- iv. tracking employee start and finish times to improve dispatching and scheduling;
- v. confirming service and delivery to sites;
- vi. identifying and addressing dangerous driving practices, including use of excessive speed;
- vii. improving efficiency by monitoring and evaluating driving patterns and routes;
- viii. monitoring fuel consumption and Vehicle idling time to reduce waste and gas emissions;
- ix. collecting data that will assist SD51 when investigating Vehicle collisions or similar accidents;
- x. assisting SD51 in investigating incidents involving SD51 Vehicles;
- xi. assisting in SD51's response to complaints;
- xii. assisting SD51 in the efficient maintenance of Vehicles and to reduce maintenance costs through early mechanical diagnosis; and
- xiii. assisting in compliance with SD51 legal and regulatory obligations, including occupational health and safety requirements.

### **Use of GPS Data, Investigative Purposes & Discipline**

GPS Data may be subject to audits undertaken at periodic intervals or in response to identified risks, incidents or predetermined events. GPS Data will not be monitored in real-time on an ongoing continuous basis, but may be routinely accessed, audited or reviewed for the purposes described in this Policy and in accordance with FIPPA.

While the primary use of GPS is to increase employee safety and protect SD51 property, SD51 reserves the right to access, use and rely upon GPS Data for investigative, employment and disciplinary purposes (up to and including termination) in compliance with FIPPA, including, without limitation, in the following circumstances:

- i. where a Vehicle is operated outside of approved procedures or otherwise contrary to District policy;
- ii. where a Vehicle is operated contrary to applicable laws, including the *Motor Vehicle Act*, or contrary to prudent and careful standards for a trained operator holding a valid licence or certification to operate the Vehicle;
- iii. where an employee is involved in any sort of collision, incident or accident where there is or may be an allegation of fault against the employee or SD 51;
- iv. where a complaint has been made by a third party about the unsafe or unlawful operation of a Vehicle;
- v. where GPS Data may yield data relevant to an ongoing investigation; and
- vi. where an issue is identified through an audit of GPS Data that requires further investigation.

Any action to remove, bypass, disconnect or damage GPS equipment will be grounds for discipline up to and including termination.

### **Access, Storage and Security**

GPS Data is protected by reasonable security measures and access is restricted by SD51 to authorized users who must have proper credentials to access the information. Authorized SD51 personnel will be permitted to access this data only on a need to know basis, and employees who are granted access are expected to keep this information confidential and to use it only in

accordance with this Policy. Failure of authorized personnel to keep confidential and safeguard this information appropriately and in accordance with this Policy may be subject to discipline.

GPS Data is stored by Geotab, a third-party service provider, using servers based in Canada. Geotab are also used to perform maintenance, troubleshooting and related services on GPS-related software and functions. SD51 only provides access to the information that is necessary for the applicable service to be performed. In addition, we require service providers to protect the information in a manner that is consistent with our privacy policies, security practices and *FIPPA*.

Individual Vehicle operator names will not be used or entered into any GPS equipment. Driving activity will be monitored and tracked using an identification number to ensure the Vehicle operator's name is protected from unauthorized access, use and disclosure.

Responsibility for the operation of the system and access to the GPS vests in the Secretary Treasurer. Any concern or complaints about the operation of the system should be directed to the Secretary Treasurer through the School Board Office.

### **Retention**

SD51 maintains personal information for only as long as it is needed for employment, business, operational or legal reasons. Any personal information that is used to make a decision about an individual will be retained for at least one year in compliance with *FIPPA*. SD51 may be required by law to retain some personal information for longer periods.

### **Questions**

Questions, concerns or complaints about this Policy or the use of GPS can be directed to the Secretary Treasurer.