

Part 4: GPS Management

GPS are supplied to LWB by a third party vendor and fitted to all vehicles to improve the level of safety offered to employees, carers and clients and to ensure accountability and security of these assets.

The GPS offers the following functionality to the driver:

1. Driver identification
2. Business purpose identification
3. Confirmation of the *Daily Visual Inspection* (TBA)
4. Messaging to and from NSO
5. Navigation mapping
6. Driver working time monitoring (fatigue management)
7. Journey routing

Carer vehicles that are solely driven by carers are fitted with a GPS, however without an MNAV.

FM are the point of contact for all GPS related queries from employees and the third party GPS supply vendor is not to be contacted.

A. Fitment of Devices

FM is the sole authority delegated to arrange installation and removal of GPS to and from vehicles on behalf of LWB.

Generally, a GPS is fitted before a new vehicle is issued to LWB and will be removed immediately prior to disposal.

Where applicable, FM will contact the Regional Fleet Contact Person where access to vehicles may be required by the GPS vendor.

B. Duty to Use Devices

See: [§C. Terms and Definitions → Authorised Driver](#)

See: [Part 1 → A. Authority to Drive](#)

1. GPS PIN

Upon receipt of an *Authority to Drive Request* by FM:

- a. Temporary GPS PINs with a life of one month from initial approval date will be issued to LWB

employees not yet in possession of an employee number.

LWB employed drivers with an expired GPS PIN must contact FM as soon as possible for permanent GPS PIN details before driving vehicles, should they not be advised by FM beforehand.

- b. Temporary GPS PINs will be issued to contractors.

The life of a temporary GPS PIN for non LWB drivers is 12-months from the initial approval date, whereby the Manager Engaging Contractors will need to ensure that the contractor has reapplied for authority to drive as necessary before continued driving of a vehicle and;

- c. Permanent GPS PINs will be issued to LWB employees in possession of an employee number at the time of their application.

All drivers must enter their GPS PIN and journey purpose into the MNAV prior to the commencement of every journey. The driver is required to accurately indicate whether the journey is for business or private use as described below.

The GPS must be left on for the duration of any journey and not be switched off, unless doing so as part of a maintenance hard-reset procedure.

Drivers must minimise their physical interaction with the GPS while the vehicle is in motion.

It is recommended that all interactions occur only while the vehicle is stationary and it is safe for the driver to do so.

2. Journey Purpose Options

One private and four business journey purpose options are available on the MNAV when logging into the device, following GPS PIN entry.

Drivers must select the option which best describes the purpose of the trip they are about to embark upon.

Definition of the business-related journey purposes are as follows:

- a. **Client Support:** For trips relating to carrying out duties involving direct client support, both when clients are in the vehicle and/or driving to or from client support activities.
- b. **Ops/Mgmt Task:** For trips relating to operations management including travel between sites and normal conduct of duty for operations management.
- c. **Meetings:** For trips when travelling to a meeting, or training session outside of normal duties including meeting with third parties (funders), community groups, etc.
- d. **Admin Duties:** For trips relating to other administrative duties not covered above, such as picking up supplies, banking, mail run, vehicle maintenance, etc.

3. Failure to Use GPS PIN or Use of Other Driver's GPS PIN

If a GPS PIN is not entered prior to the commencement of a journey, an audible alarm will sound within the vehicle every two seconds during any such journey.

Any journey undertaken without entering a GPS PIN will be reported by FM to PS&C for action and regional follow up.

Entering the GPS PIN is important for managing driver safety and allows LWB to know the location of a driver in the event of an employee or client based emergency.

Employees who choose not to enter a GPS PIN forfeit their right to privacy, as the trip will be recorded as a business journey per Part 4 (D) 1a, with details visible on standard reports.

Unknown driver trips taken in an allocated driver's vehicle, will be attributed to the allocated driver of such vehicle.

Authorised drivers are not permitted to share their GPS PIN with unauthorised drivers and neither is an unauthorised driver permitted to use an authorised driver's GPS PIN.

Failure to use a GPS PIN or found to be in use of other driver's GPS PINs unless where permitted in these guidelines, constitutes a breach of these *Guidelines*.

C. Duty to Report GPS Defects

Any MNAV functional defects must be reported to FM as soon as possible for investigation and rectification in order to protect driver privacy and to enable the GPS to conduct the activities it was installed in vehicles for.

Defects may affect the quality of data collected by LWB for the purpose of FBT/RFBA, so it is in both LWB's and the driver's best interest to minimise the time a device is kept in a defective state.

D. Data Collection

LWB utilises the *Workplace Surveillance Act 2005 (NSW)* and the *Australian Privacy Principles (APP)* as minimum national standards for surveillance and privacy compliance.

1. Type of Data Collected

Trip data will be collected after the driver's GPS PIN and trip purpose is entered into the console, prior to the commencement of each journey.

Upon entry of the GPS PIN, the GPS will record data that will be collected by Navman Wireless.

Different data is collected based on the type of trip purpose selected:

a. Business

- i. Logon/logoff date and time
- ii. Driver name
- iii. Trip purpose
- iv. Vehicle registration number
- v. Route of journey taken
- vi. Stop/start incidents
- vii. Trip speed
- viii. Trip duration
- ix. Events
- x. Non-compliance (Unknown drivers)
- xi. Odometer reading
- xii. *Daily Visual Inspection* confirmation

b. Private

- i. Logon/logoff date and time
- ii. Driver name
- iii. Trip purpose
- iv. Vehicle registration number

- v. Start/stop date and time
- vi. Trip speed
- vii. Trip duration
- viii. Odometer reading
- ix. *Daily Visual Inspection* confirmation

2. Use of Data

GPS has significant reporting capabilities and provides reports to monitor the use and operation of vehicles.

These reporting capabilities are used for, however not limited to:

a. Fleet and Maintenance Management

- i. Identify vehicle location
- ii. Monitor vehicle operating costs
- iii. Optimise vehicle utilisation
- iv. Ensure scheduled maintenance compliance
- v. Record carbon footprint
- vi. Fuel transaction validation
- vii. Route planning and duration
- viii. Manage driver infringements
- ix. More efficient and effective management of LWB's FBT obligations
- x. Provide data for the preparation of LWB's Fringe Benefits Tax return.

b. WHS

- i. Driver/vehicle/client safety
- ii. Encourage safer driving practices
- iii. Identify and arrange appropriate driver awareness, training and familiarisation courses required to improve driver and passenger safety and to assist reduce accidents
- iv. Assist with the investigation of accidents reported through LWB's WHS reporting system.

3. Data Storage

Teletrac Navman and its entire staff are subject to strict privacy protocols in collecting data relating to vehicle use. Data is stored in accordance with strict data management protocols surrounding access to such for a period of up to 18-months.

4. Access to Data

FM employees at NSO have access to detailed trip data collected on any identified business journey in a vehicle.

A vehicle private journey is not visible on the live tracking map and does not disclose journey location on a standard printable report.

A request for high definition trip data may be made by a driver or their Manager in the event of a motor vehicle accident, confirmation of a speeding event, or missing vehicle/driver/client.

LWB reserves the right to allow access to GPS data by select operational management employees, upon approval from the respective State HRM.

Any driver may access any data collected in relation to that driver's operation of the vehicle.

Access to a driver's data can be obtained upon provision of a written request to the National Fleet Manager. No reasonable request for such data will be refused.

Periodic review of this guideline will be conducted by the National Fleet Manager, to ensure that the data has been collected, is stored and accessed in accordance with these *Guidelines*.

An access to data request, may also be submitted by an officer of a law enforcement agency for use in connection with the detection, investigation or prosecution of an offence.