



DRIVER BEHAVIOUR DATA RECORDERS POLICY

Executive Summary

This policy covers how we protect West Midlands Police (WMP) information and data obtained from the Data Recorder (Driver Behaviour) system from unauthorised use.

This Force Policy document will help you to understand your responsibilities to fulfil them.

WMP's approach to information security is to balance the business requirements of the organisation with the potential harm and risk of an information security incident and the cost and logistics of implementing security controls.

Authorised Professional Practice (APP)

This policy has been checked against APP and there is none in relation to the subject matter of this policy.

Scope

The Chief Constable has overall direction and control of WMP and is ultimately accountable for all policies and supporting documents of the organisation and its actions. Adherence to this force policy will be expected from All staff, including permanent, temporary, volunteers, contract staff, delivery partners and third-party suppliers. Everyone has a responsibility for safeguarding data provided by the Data Recorder system.

Objectives

The purpose of this policy is to ensure users understand how the data is to be used in relation to WMP activity and relates to the preservation of:

- Confidentiality - ensuring that the information is accessible only to those authorised to have access, disclosed only to those authorised to receive it, and so disclosed only for police purposes;
- Integrity - safeguarding the accuracy and completeness of information.
- Availability - ensuring that authorised users have access to information when required.

Definitions/Acronyms



APP	Authorised Professional Practice
AA	Appropriate Authority
CIU	Collision Investigation Unit
DDU	Driver Data Unit
DSB	Driver Standard Board
FOI	Freedom of Information
IOPC	Independent Office of Police Complaints
IT&D	Information Technology and Digital
L&D	Learning and Development
LPA	Local Policing Area
MI	Management Information
POLAC	Police Accident Complaint
PSD	Professional Standards Department
RFID	Radio Frequency Identification
SLT	Senior Leadership Team
SMR	Service Maintenance and Repair
WMP	West Midlands Police

Policy Statements

1. OVERVIEW

- 1.1 Since 2016 WMP have installed Data Recorders in to the majority of the vehicle fleet.
- 1.2 The introduction of technology assists both individuals and management to pro-actively and continuously improve officer safety and well-being, public safety and well-being, improve driving standards and fleet care, increase fleet availability and reduce event/accident/collision/repair costs to WMP.
- 1.3 The overarching principle for the driver behaviour system is to improve or maintain professional driver standards and to improve public image, protect our staff and ultimately improve the efficiency of the Police fleet.
- 1.4 By working closely with Learning & Development (L&D), Corporate Communications, the Driving Standards Board and staff associations it would identify cultural 'attitudes' and positively drive cultural changes in order to improve driving behaviours force wide.
- 1.5 Each driver will be able to view their own 'Behaviour Score', in order to self-reflect and adjust driving behaviours that could have possibly led to an incident occurring.
- 1.6 WMP can improve driving standards, address and monitor on-going driver development and enhance the WMP driving culture by:
 - Publication of a WMP driver policy with regards to driving standards
 - Access to training to improve personal driving standards
 - Cultural changes for both staff and management with regards to personal driving standards.
 - Improve driving behaviours and improve accountability
 - Improved identification and allocation of fleet resources
 - Tailored driver development

2. DATA



- 2.1 Data is collected from the vehicle and driver and transmitted over the mobile phone network in a binary format.
- 2.2 At no point is data transmitted that would identify who is driving by way of name or collar/payroll number.
- 2.3 Data is only linked to a collar/payroll number once within the force network. Data is then subject to WMP standard network controls.
- 2.4 Personal data from vehicle data recorders will be respected and will only be used within the confines of this policy.

3. DATA COLLECTED FROM RECORDERS

- 3.1 Driver identification through their ID card being swiped on the ID unit mounted in the vehicle (this is only matched once the secure Radio Frequency Identification (RFID) number reaches the force network)
- 3.2 Details of journeys taken in the vehicle - these can then be viewed per driver or by the vehicle as a whole. This includes the actual vehicle track plotted on a map and overall vehicle utilisation.
- 3.3 Whether the vehicle was driven on/off blue lights (response) mode.
- 3.4 The standard of how the vehicle was driven. Scores, derived through parameters validated by the force driving school, will describe whether the vehicle was driven:
 - Well above expected (<100 points)
 - Above expected (101-200 points)
 - As expected (201-400 points)
 - Below expected (>400 points)
- 3.5 Descriptions of the factors (i.e. harsh braking or cornering) contributing to each score so the driver can adjust accordingly.
- 3.6 Guidance on the scoring calculation can be found in the Scoring guidance document

4. DATA USAGE/DISSEMINATION

- 4.1 The data is then produced in a number of management information (MI) forms for each individual user, supervision or performance management teams. Other than system administrators only users will see their own data, unless used in performance management concerns.
- 4.2 On the first notification of exceeding 1000 points on a daily report the individual driver is expected to review and reflect on their driving and adjust accordingly.
- 4.3 If drivers receive a second notification, line managers will be advised to review and discuss the scores with their teams.
- 4.4 In the third instance a notification is sent to the Appropriate Authority (AA) for review and action.



- 4.5 Driver's should complete a 'FleetMotus Vehicle Telematic Notification' document (attached to a notification), for every notification received within 28days of receipt. These should then be entered Oracle Fusion Performance Records.
 - 4.6 For a first notification drivers must only save a copy of the FleetMotus Vehicle Telematic Notification document in Oracle fusion. However, drivers have the option to share the document with line managers for review and discussion if they wish to do so.
 - 4.7 For 2nd & 3rd notifications, the driver must 'Save & Submit' entries for discussion with line manager within 28 days.
 - 4.8 Outcomes of discussions with a Supervisor or AA must be recorded on WMP Conversations, especially if driver behaviour that resulted in high scores was ultimately justified.
 - 4.9 It is the driver's responsibility to ensure this justification is saved as no data can be altered within the driver behaviour system. The saved evidence will then available for production at a later date.
 - 4.10 Data may be provided as evidence to a Driver Standards Board (DSB) governance panel to review either group or individual driver behaviours and apply appropriate changes to the system settings, guide future training requirements or apply sanctions to drivers.
 - 4.11 L&D Driver Data Unit (DDU) will use data to manage future training or refresher courses for drivers by understanding trends of driving styles across the force.
 - 4.12 Fleet Services will use the data to understand the efficiency of the fleet and manage Service, Maintenance and Repair (SMR) schedules.
 - 4.13 Fleet Services will have access to all data to provide individual reports to areas such as Driver Standards Board (DSB), L&D, Collision Investigation Unit (CIU), Professional Standards Department (PSD) or Independent Office for Police Conduct (IOPC).
 - 4.14 Performance information will be supplied monthly to Force Senior Leadership Team (SLTs) in regards to driver behaviour.
 - 4.15 Data may be provided to force departments for investigation or external partners in defence of a complaint or Police Accident (POLAC) involving a police driver/vehicle. In these circumstances the data will be retained as part of the investigation or case.
 - 4.16 Supervisors/Line managers will have processes (See Process Maps guidance document) to manage individual drivers who are driving outside of policy or outside the way they have been trained. These processes are also available from Fleet Services.
 - 4.17 Reference must be made to this policy and supporting documentation when receiving/using any data from the Data Recorder system/software.
- 5. REQUESTS FOR DATA**
- 5.1 Data gathered through the use of Data Recorders will be provided to investigating officers including, but not limited to CIU, PSD and Independent Office of Police Complaints (IOPC).
 - 5.2 Data must be requested using a [WT820 'Vehicle Telematics Information Request' Form](#).



- 5.3 The WT820 must be authorised and signed by a rank of Inspector/Police Staff equivalent or above.
- 5.4 The WT820 will be retained for audit or reference purposes.
- 5.5 Requested data should be proportionate to the investigation.
- 5.6 Any lawful request for data e.g. Freedom of Information (FOI) request will be sent to FOI Team for processing. The FOI Team will decide whether the request is answered subject to applicable exemptions.

6. ACCESS TO DATA

- 6.1 Access to data, rather than requests for data, can be provided for users that may require information on who is driving a vehicle, how a vehicle is driven or the location of a specific vehicle out of normal Fleet Services hours of operation.
- 6.2 Applicants should have the request signed by a Superintendent or equivalent Police Staff role and include;
- Role of applicant
 - Reason for request
 - Any other evidence to support the application
- 6.3 Requests for access to data will be authorised by Fleet Services and created through IT&D.
- 6.4 Limited staff in departments such as Collision Investigation Unit (CIU), Learning and Development (L&D), and Professional Standards (PSD) will have restricted views after authorisation.
- 6.5 Limited Fleet Services staff will have full access to reports and data provided by the system

Relevant Legislation / Policies / Procedural Guidance

Driver Behaviour Procedural Guidance

Equality Impact Assessment

WMP places trust in their employees to comply with force policies and to work in accordance with and in support of:

[WMP Vision and Values](#)

[Code of Ethics | College of Policing](#)

[Voice of the Child](#)

	What impact has this policy had on the nine protected characteristics in relation to the three general duties? (If applicable)	How will this updated policy positively impact each of the nine protected characteristics in relation to the three general duties? If not, explain why it will not.
Age	No Impact	This system will provide more accurate and reliable



(including children and young persons)		data/information about a persons' driving style, etc, which will tackle any issues of unfair treatment, bias or discrimination.
Disability	No Impact	This system will provide more accurate and reliable data/information about a persons' driving style, etc, which will tackle any issues of unfair treatment, bias or discrimination.
Gender Reassignment	No Impact	This system will provide more accurate and reliable data/information about a persons' driving style, etc, which will tackle any issues of unfair treatment, bias or discrimination.
Pregnancy & Maternity	No Impact	This system will provide more accurate and reliable data/information about a persons' driving style, etc, which will tackle any issues of unfair treatment, bias or discrimination.
Marriage & Civil Partnership	No Impact	This system will provide more accurate and reliable data/information about a persons' driving style, etc, which will tackle any issues of unfair treatment, bias or discrimination.
Race	No Impact	This system will provide more accurate and reliable data/information about a persons' driving style, etc, which will tackle any issues of unfair treatment, bias or discrimination.
Religion or Belief	No Impact	This system will provide more accurate and reliable data/information about a persons' driving style, etc, which will tackle any issues of unfair treatment, bias or discrimination.
Sex	No Impact	This system will provide more accurate and reliable data/information about a persons' driving style, etc, which will tackle any issues of unfair treatment, bias or discrimination.
Sexual Orientation	No Impact	This system will provide more accurate and reliable data/information about a persons' driving style, etc, which



		will tackle any issues of unfair treatment, bias or discrimination.
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Publication Instructions

Suitable for publication to public

Document Control

Strategic Lead: <i>[role and name]</i>	██████████ – Head of Fleet and Logistics
Policy Author(s): <i>[role and name]</i>	██████████ – Fleet Manager
Effective Date:	23/03/2023
FET Lead: <i>[role and name]</i>	Mr Gillett – Director of People and Commercial Services
Version Number:	1.1
Review Date:	31/12/2026

Any enquiries in relation to this policy should be made directly with the Strategic Lead.

All policies are subject to a formal consultation process which encompasses Legal, Professional Standards, Faith Groups, Trade Unions, Independent Advisory Groups and wider force groups and any other relevant parties. A record of consultation can be found on the Policy Portal.

It is responsibility of the Strategic Lead to ensure that all links within the policy are correct and accessible.

Amendment History:

Version Number:	Effective Date:	Summary of Amendments:	Author:
1.1	02/07/25	Reviewed by ██████████ and advised this needs to be the current version until the telematics data has been sorted. Therefore, extended the review date. Approved by Mr Gillett at Commercial Board 08/07/25	██████████