

# MONITORING OF NLLS VEHICLES

Section: Employee Policies | Chapter: Fleet Management & Monitoring | Page(s): 5 Subject: GPS MONITORING OF NLLS VEHICLES | Sec 1, 1Q – Appendix E  
Review Date: New | Revised Date: 2025-09-26 | Effective Date: 2025-09-26

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## 1. Purpose

The Northern Lights Library System (NLLS) is committed to the safe, efficient, and responsible operation of its fleet vehicles. This policy establishes clear guidelines on the use of GPS and other monitoring systems for tracking NLLS vehicles, to ensure compliance with legal, operational and performance standards, while maintaining privacy protections in accordance with applicable provincial laws.

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## 2. Scope

This policy applies to all employees who operate NLLS vehicles.  
It outlines:

- How GPS and monitoring systems are used;
  - The types of data collected and their purpose;
  - How data may be used in employee performance assessments and compliance monitoring;
  - The security arrangements and other measures used by NLLS to protect any personal information collected; and
  - How NLLS' collection, use, and disclosure of personal information through the use of GPS and monitoring systems is consistent with the *Access to Information Act* and *Protection of Privacy Act*, as amended, or repealed and replaced.
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## 3. Use of GPS & Monitoring Systems

### 1. Active Monitoring:

- NLLS vehicles are equipped with GPS tracking and other monitoring technologies to ensure operational efficiency, safety, and compliance with NLLS policies; and
- Employees are to be given notice and must acknowledge the use of these systems as a condition of vehicle operation.

## 2. Types of Data Collected:

- Location tracking of NLLS vehicles and drivers (real-time and historical route data);
- Speed and driving behavior (sudden acceleration, hard braking, idling times); and
- Vehicle diagnostics and usage data (fuel consumption, mileage, maintenance alerts).

## 3. Purpose of GPS Monitoring:

NLLS may collect and use GPS and monitoring data for the following operating programs and activities in accordance with 33(c) of the *Freedom of Information and Protection of Privacy Act*:

- Safety & Risk Management: Ensuring compliance with traffic laws, safe driving practices, and responding to incidents;
- Operational Efficiency: Route optimization, tracking delays, and identifying inefficiencies in vehicle use;
- Employee Performance Management: Assessing adherence to schedules and identifying concerns regarding vehicle use; and
- Compliance & Investigations: Addressing complaints, investigating accidents, or verifying compliance with NLLS policies.

4. If any employee has questions about the collection, use, and disclosure of GPS and monitoring data pursuant to this policy, those inquiries should be directed to NLLS' privacy officer, [privacy@nlls.ab.ca](mailto:privacy@nlls.ab.ca)

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## 4. Employee Expectations & Responsibilities

1. Employees must not tamper with, disable, or interfere with GPS or monitoring devices installed in NLLS vehicles.
  2. Employees are expected to always operate vehicles in a safe and responsible manner.
  3. Employees are personally responsible for any traffic violations or fines incurred while using NLLS vehicles.
  4. NLLS does not intend to use GPS and monitoring data for constant, real time surveillance of employees, but may use real-time or historical GPS and monitoring data in response to complaints, investigations, identified performance issues, performance evaluations, and employee compliance monitoring as outlined in this policy.
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## 5. Use of Data for Performance Assessments

1. Data from GPS and monitoring systems may be reviewed as part of employee performance assessments or when concerns arise regarding:
    - Excessive idling, unnecessary detours, or unapproved stops;
    - Driving behavior that may pose a safety risk; and
    - Complaints and concerns of non-compliance with expected delivery times, time-theft, or vehicle usage policies.
  2. Employees may receive coaching, feedback, or disciplinary action if GPS and monitoring data reveals an employee performance issue, including any violations of NLLS policies.
  3. GPS and monitoring data will not be used as the sole determinant for disciplinary action. NLLS will consider all relevant information, and employees will be given an opportunity to respond to any concerns identified through GPS and monitoring data.
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## 6. Privacy & Data Protection

1. GPS and monitoring data can only be accessed by authorized personnel, being the Executive Director, Bibliographic Services Manager, Privacy Officer and/or their designates.
  2. Data Retention: GPS and monitoring data will be retained for 24 months, after which it will be securely deleted, unless the data is required to be retained for a longer period as a result of any incident investigations, personnel evaluations and decisions, or other legal matters.
  3. Employee Access: Employees have a right of access to their personal information in accordance with the *Access to Information Act* and *Protection of Privacy Act*, as amended, or repealed and replaced.
  4. Disclosure of GPS and monitoring data:
    - Disclosure of GPS and monitoring data that includes personal information will only be made where permitted by the *Access to Information Act* and *Protection of Privacy Act*, including where NLLS is required to disclose the data to law enforcement, to an insurer or legal representative, or where otherwise required by law; and
    - Requests for GPS and monitoring data from law enforcement must be received in writing and NLLS may choose to seek independent legal advice regarding the request before responding.
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## 7. Non-Compliance & Disciplinary Action

1. If an employee fails to adhere to this policy, including by disabling or tampering with a GPS and monitoring system, the employee may face disciplinary action up to and including termination.
  2. Employees who repeatedly violate vehicle use policies, including instances identified through GPS and monitoring data, may face progressive discipline, including additional training, suspension of vehicle privileges, other corrective measures.
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## 8. Policy Review & Updates

- This policy will be reviewed annually or as required to ensure compliance with privacy laws and operational needs.
  - Updates will be communicated to all employees, and re-acknowledgment of this policy may be required.
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## 9. Related Policies

- NLLS Vehicles, Sec 1, 1R

## 10. Notice & Acknowledgment

All employees using NLLS vehicles must sign an acknowledgment form confirming they have read and understand this policy.

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**NLLS Executive Board Chair**

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September 26, 2025

**Date of Approval**

## **Notice and Acknowledgement of the GPS Fleet Monitoring Policy**

**and the collection, use, and disclosure of personal information pursuant to  
the *Protection of Privacy Act***

I, \_\_\_\_\_, acknowledge that I have reviewed NLLS's GPS Fleet Monitoring Policy and understand how NLLS may use GPS and monitoring data, as well as the expectations and responsibilities of employees.

I further understand that the collection, use, and disclosure of my personal information pursuant to the GPS Fleet Monitoring policy is authorized under section 4(c) of the Protection of Privacy Act (POPA), amended, or repealed and replaced, and is necessary for the administration and operation of NLLS programs and services, including the management of employees and protection of system assets.

If I have questions about this policy or the handling of my personal information, I understand that I may contact the Privacy Officer at [privacy@nlls.ab.ca](mailto:privacy@nlls.ab.ca).

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature