

## Dash Cam Policy and Procedures

This policy sets out the position of Riverside Contracting, Inc. on the use of on-board incident capture devices (Dash Cams) in vehicles and its effect on employees.

The primary uses of Dash Cams are to assist in the protection and safety of persons and property, prevention or detection of criminal offences, defense of legal claims, and most importantly, driver training. It is not Riverside's intended purpose to use Dash Cams for monitoring the work of employees.

### PRINCIPLES.

The following principles apply:

- a. Dash Cams will be installed when appropriate in company vehicles, (i.e. pickups, trucks & tractors).
- b. Dash Cams are set up in a way that ensures that there is minimal intrusion of privacy, and that any intrusion is fully justified.
- c. All employees are required to review and sign the acknowledgement sheet for this policy prior to operating or entering a company vehicle. Employees may come across multiple situations and vehicles with dash cameras installed, and should be aware that an event or violation can occur at any time while in/around any piece of equipment.
- d. Violations and points will be accumulated for each individual on a one calendar year basis. Points will not roll over from one year to the next, but data will be collected for the driver's year-to-year internal record with Riverside while driving a company vehicle.
- e. No images or information will be stored except where a relevant incident(event) has occurred. Dash Cams typically only retain up to 12 seconds of the incident(event). However, it is possible to review up 100 hours of video if deemed necessary to determine fault in the case of a complaint, citation, or incident that did not get saved as an Event. This is an outside view only.
- f. Drivers are responsible for their actions as well as the actions or violations of any passengers in the vehicle while they are operating, therefore it is the driver's responsibility to make sure the passenger is abiding by laws as well (such as wearing a seatbelt). Violations can occur at any time while operating a company vehicle, even after hours or while not on the clock. Drivers and passengers in company vehicles must adhere to and abide by all local and federal laws at all times while operating company vehicles.
- g. The Dash Cam will not typically be monitored by an agent of the company at all times and the camera will usually remain in an automatic "ready to record" status. However, there is a Live view feature on each camera. This feature will only be used and activated in special circumstances or at the request of the driver.
- h. The Dash Cam will not be accessed covertly to monitor the quality and amount of work completed by employees. However, where an incident is captured that reveals inappropriate conduct that cannot in good conscience be ignored, Riverside Contracting, Inc. reserves the right to use corrective/disciplinary action in the business interests. This may include grievance, or disciplinary proceedings, defense or litigation of a legal claim, and/or driver training.
- i. When relevant, Dash Cam footage may be retained and used for future Health & Safety training, including the improvement in Safety Quality and Training of drivers. Riverside will acquire explicit permission given by the employee to utilize and/or publicize any photos, recordings, and information gathered before use in other applications such as training.
- j. The manufacturer's overview sheet and an explanation of how the camera works can be made available to employees upon written request.

## EMPLOYEES

When Dash Cams are deployed, they are likely to capture pictures of employees and potentially citizens/non-employees. Dash Cam evidence may be used as part of an employee investigation where, in the reasonable belief of management, that there may have been misconduct, or a breach of Health and Safety. Where footage is used in disciplinary proceedings, it may be retained for a further period of up to five years. The employee may be permitted to see and respond to the images, in addition to the employee's right to request a copy, in which a written request should be provided within one month of the date of the incident.

Under appropriate circumstances the footage may be provided to Police (or other Competent Authority) with the intention to prosecute for criminal offences. In defense of legal claims, or in pursuance of civil recovery, footage may also be provided to our legal representatives with the intention of providing evidence before the courts.

## NON-EMPLOYEES

Where an incident involves a third party, the relevant insurers will be informed of the details. Although the third party may be made aware that there is recorded evidence in the form of Dash Cam footage, a copy of the recorded material can only be obtained if requested by the subject themselves. Third Parties should also be aware that under appropriate circumstances the footage may be provided to Police (or other Competent Authority) with the intention to prosecute for criminal offences. In defense of legal claims, or in pursuance of civil recovery, footage may also be provided to Riverside Contracting's legal representatives with the intention of providing evidence before the courts.

## VIOLATIONS

Below is a list of commonly triggered events and their corresponding violation points (if any) recorded by the dash cameras installed in company vehicles.

| <b>10 Point Violations</b>           | <b>3 Point Violations</b>                |
|--------------------------------------|--|
| Falling Asleep                       | Failed to Keep an Out                    |
| Aggressive – Level 2                 | Cell Phone Hands Free - Distraction      |
| <b>5 Point Violations</b>            | Other Communication Device - Distraction |
| Near Collision                       | Electronic Device – Distraction          |
| Following Distance: <1 second        | Passenger Distraction                    |
| Too Fast For Conditions              | Other Distraction                        |
| Unsafe Lane Change                   | Incomplete Stop                          |
| Failed To Stop                       | Not on Designated Roadway                |
| Ran Red Light                        | Not Scanning Roadway                     |
| Posted Speed Violation               | Lack of Intersection Awareness           |
| Drowsy                               | Improper/Inadequate Mirror Use           |
| Aggressive                           | Driver Conduce Concern                   |
| ER (Electronic Recorder) Obstruction | No Seat Belt                             |
| Other Violation                      | Passenger Unbelted                       |
| <b>4 Point Violations</b>            | <b>2 Point Violations</b>                |
| Following Distance: <1 sec to <2 sec | Following Distance: <2 sec to <3 sec     |
| Late Response                        | Driver Smoking                           |
| Blank Stare (Fatigue)                | 1 Point Violations                       |
|                                      | Following Distance: <3 sec to <4 sec     |

| <b>0 Point Violations / Misc. Events</b>                                |
|---|
| Near Collision – Unavoidable  |
| Possible Collision  |
| Collision (points accumulated for follow distance, late reaction, etc.) |
| Positive Recognition  |
| Handheld Device (CB Radio)  |
| Cell Phone Hands Free - Observation                                     |
| Camera Issue  |

#### DISCIPLINARY ACTION

A point system is applied to track and calculate driving behavior. Each driving violation has an assessed point value attached to it and the points will be accumulated on the driver's internal record with Riverside beginning each calendar year. Drivers will receive disciplinary action of varying degrees based off their accumulation of points, as described below:

**25 or more points** – The driver will receive a written warning with an explanation of all current violations and the accumulation of points for each.

**50 or more points** - The driver will receive another written warning with an explanation of all current violations and the accumulation of points for each. The driver will also receive a written disciplinary plan for any further actions taken to correct the driving behavior.

**75 or more points** – The driver will receive an intervention for additional training and/or may result in termination.

#### **Disciplinary action up to and including termination of employment will be taken against any employee who is involved in any of the following actions.**

1. Destroying, dismantling or unplugging the camera (device).
2. Deliberately blocking the view of the camera inside the cab or outside the cab of the vehicle. This will include clothing items, tape, sun visor, etc.
3. Exhibiting unsafe behavior that endangers the lives of other workers and the traveling public.

Disciplinary action and write up's will negatively affect the annual safety bonus of the qualifying employee (if any). See the Bonuses section in the Employee Handbook for more details.

#### ACCESS TO DASH CAM RECORDINGS

Access to retained images and information will be kept confidential within the agents of Riverside Contracting with appropriate security measures to safeguard against unauthorized access and use. Access is approved on an incident -by- incident basis. Once access is approved by the authorized agent of the company, recorded footage can be reviewed (not deleted or amended) by:

1. Safety Compliance Manager
2. Directors
3. Management
4. Driver Trainers

5. Statutory bodies such as Police, HSE, etc.

Any other person with interest must obtain authority from the Safety Compliance Manager to view recorded footage, providing reasons and justification. Any persons whose images are recorded have a right to view those images, and to be provided with a copy of those images upon request within one month of the event. Availability of images will be subject to the retention period. Employees making such a request should do so in writing, providing the relevant time and date of the image, so that they may be easily identifiable. The request should be made to [mgallagher@riversidecontracting.com](mailto:mgallagher@riversidecontracting.com).

The Safety Compliance Manager may automatically send the images or information to the employee for review without a written request being needed. In that event, the information will be sent to the employee's email on file with the office. It is the employee's responsibility to keep the office and their employee file up to date with correct contact information.

#### COMPLAINTS

Complaints about the operation of the Dash Cam system should be addressed to Michael Gallagher, Safety Compliance Manager, Riverside Contracting, Inc.

#### MONITORING AND REVIEW

This policy will be regularly reviewed for potential edits or legislative change. This policy forms part of employees' terms and conditions of employment and may be subject to change at the discretion of Riverside Contracting, Inc.

#### ACKNOWLEDGEMENT

I, \_\_\_\_\_, have read the Company's Dash Camera Policy and agree to abide by it. I understand violation of any of the above terms, dismantling, destroying, or altering the view of the camera inside the cab or outside the cab may result in discipline, up to and including my termination.

\_\_\_\_\_  
Employee Name (Printed)

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date