

Public Safety Camera System Policy

(Policy Number – KL-GOVPOL010)

(Policy Type – Council)

1 Introduction

The installation of the public safety camera system supports Kentish Council and Latrobe Council's (Council) efforts to reduce crime and anti-social behaviour helping people to feel safer, manage risks to property and provide its services. Council recognises that people have an expectation of privacy in public spaces.

2 Purpose

- a) This policy details the guiding principles that will be applied to the management of Council's public safety camera system which is shared and accessed by Tasmania Police. It acts as a framework for the management and integration of public camera systems in public places within Council.
- b) This policy aims to provide guidance to Council employees in relation to the assessment, installation and operation of Council owned safety camera systems. It explains how Council will make balanced decisions about the installation of public safety camera systems, against its commitment to overall safety and security of residents, visitors and Council workers.
- c) Both Council and Tasmania Police will work together to improve safety, security, address crime and manage anti-social behaviour within the municipalities. The public safety camera system operates under the agreed Memorandum of Understanding (MoU) between Tasmania Police and Council that the system will only be used for the following purposes within this Public Safety Camera System Policy to:
 - i) enhance public perceptions of safety;
 - ii) deter and detect crime, criminal damage and public disorder;
 - iii) assist Tasmania Police in determining response to criminal activity as well as assisting in the detection and prosecution of offenders;
 - iv) provide evidence for criminal and civil actions;
 - v) monitor and assist traffic management issues;
 - vi) where enabled, automatically capture and search Automatic Number Plate

Recognition (ANPR)/ License Plate Recognition (LPR) records (including number plate text and vehicle make/model/colour) to support the purposes listed above; and

- vii) assist other emergency services.

3 Scope

- a) This policy applies to the installation and use of all public safety camera systems managed by Council within the boundaries of the municipalities.
- b) This policy does not apply to:
 - i) unmanned Aerial Vehicles.
 - ii) mobile body worn cameras by Council officers.
 - iii) traffic data or area observation non-permanent cameras.
 - iv) sporting groups or clubs, commercial businesses or tenants under lease agreements on Council land that are not required to comply with *Personal Information and Protection Act 2004* (Tas) for public safety camera footage taken inside buildings.
 - v) public safety cameras on private land, where the data captured is not controlled or accessed by Tasmania Police or Council.
 - vi) vehicle-based cameras whether mobile or fixed.

4 Responsibilities

- a) The *Memorandum of Understanding (MoU): For the operation of public realm space Closed-Circuit Television (CCTV) cameras managed by Tasmanian councils* details the respective responsibilities of Council and Tasmania Police for CCTV systems in the municipality.
- In particular Council is responsible for:
 - i) installing, maintaining and replacing all infrastructure associated with the CCTV systems. This includes the hardware and software needed to operate, monitor and maintain the CCTV systems in accordance with its asset management policies, standards (or similar).
 - ii) the provision of any base Milestone software licensing required for the use of images, footage or recordings generated by, or captured on, the CCTV systems by Tasmania Police for the purpose of this MoU.

- iii) consulting with Tasmania Police on new or changed locations of CCTV cameras in public spaces.

5 Guiding Principles

Council has adopted the following principles as best practice ethical framework for the use of cameras that respects and protects privacy and human rights and provide the basis for the use of public safety camera systems. These principles will guide Council decisions in relation to all public safety camera system operations.

5.1 Principle 1: Legality

- a) Council will comply with the *Privacy Act 1988* (Cth) and the *Personal Information and Protection Act 2004* (Tas) when collecting data from the public safety camera system.
- b) Privacy impact assessments will be undertaken to inform the location of cameras.
- c) Council will periodically review its workplace and public safety camera practices to ensure they remain lawful.

5.2 Principle 2: Legitimate Aim

- a) Council will only collect and use information from its owned and operated cameras to support the legitimate aims to support:
 - i) Tasmania Police in its necessary, proportionate purpose related to the activities of crime prevention and investigation law enforcement; and
 - ii) Council's functions and activities.

5.3 Principle 3: Personal Privacy

- a) Council and Tasmania Police will not use the public safety camera system to automatically collect individual's personal information, except where ANPR/LPR is enabled in accordance with this policy, the MoU, and applicable legislation.
- b) Where ANPR/LPR is enabled, Council will document the specific purpose(s) for collection (e.g. crime prevention/investigation support, public safety, and traffic management), and will limit collection, use and disclosure to those purposes.
- c) ANPR/LPR configuration will be limited to what is necessary (including camera placement, capture zones, fields collected, and retention). Council will not use ANPR/LPR data for generalised monitoring of individuals, profiling or automated

decision-making that produces illegal or similarly significant effects.

- d) Council will take reasonable steps to ensure transparency where ANPR/LPR is used, including updating signage and published information to indicate that number plates may be automatically captured and used for the purposes described in this policy.

5.4 Principle 4: Proportionality

- a) Council will assess the proportionality of the camera system, to ensure the installation and operation is undertaken in such a way that is least likely to impact of privacy and human rights.
- b) Council will limit its camera use to the least intrusive acts, practices or methods that are necessary to achieve the legitimate and lawful aim.
- c) In keeping with the MoU between Council and Tasmania Police, the public safety camera system will support only Tasmania Police's law enforcement and other legislated functions.
- d) The legitimate aim outcomes must outweigh any intrusion on privacy and are proportionate to the problem being addressed.

5.5 Principle 5: Safeguards

Council will implement the following safeguards for its public safety camera network and ensure these safeguards are effective and adequately resourced.

- a) Transparency – Council will take all reasonable steps to ensure that individuals are aware of any operating cameras including:
 - i) the identification and contact details of Council, including access to this policy; and
 - ii) the purposes for which the camera system is being used.
- b) De-identification – Council and Tasmania Police will take all reasonable steps to destroy and de-identify recordings collected through the camera network if it is no longer required.
- c) Data minimisation – Council and Tasmania Police will collect personal information through the camera network only where it is necessary for lawful and documented purpose and will limit the amount and type of personal information collected (including ANPR/LPR records).
- d) Anonymity – Council and Tasmania Police will only collect anonymous

information through the camera network, rather than personal information.

- e) Information Access – Council will only provide images from the camera network to Tasmania Police where there is an MoU in place, or in accordance with the *Privacy Act 1988* (Cth), *Personal Information Protection Act 2004* (Tas) or where required under other legislation.
- f) ANPR/LPR use controls – where ANPR/LPR is enabled, Council will ensure that:
 - i) searching of ANPR/LPR records is limited to authorised users for a documented purpose;
 - ii) bulk searching, bulk export, or creation of datasets from ANPR/LPR records is prohibited unless explicitly authorised for a lawful purpose;
 - iii) any watchlist/alerting functionality is operated by, or under the direction of, Tasmania Police in accordance with the MoU and law; and
 - iv) suspected matches are treated as investigative leads only and are subject to human review, noting that automated detection may produce errors (false positives/negatives).
- g) Information Security – Council will take all reasonable steps to protect personal information collected through the camera network from being misused, lost or accessed, modified, or disclosed by authorised persons.

5.6 Principle 6: Non-Discrimination

Council will not use the camera network in a manner that discriminates based on race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status.

5.7 Principle 7: Complaints and Remedy

Council will provide information and pathways for individuals to provide written feedback where they believe their privacy has been interfered with.

6 Operation and Control

- a) Use of the cameras will be in accordance with the MoU with Tasmania Police and all standard operating procedures (SOPs) and internal Council policies for the operation of public safety cameras in public precincts.
- b) Cameras will not intentionally be used to view adjacent or nearby private residential property. Tasmania Police may do so for the purposes of following in real time alleged participants in a crime, or for another legislative purpose, that originated in the public domain.
- c) Approved contracting workers will have access to the public safety camera system, with authority from Council and/or Tasmania Police, to undertake installation, maintenance and testing of the system. Operators of the system will act in accordance with the highest standards of probity and in accordance with public safety camera system policies and procedures.

7 Collection and Storage of Data

- a) Public safety camera system data will be retained for at least 31 days unless otherwise downloaded in accordance with this policy. After this time, data may be erased.
- b) In accordance with Principle 5: Safeguards, Council and Tasmania Police are required to take reasonable steps to destroy or permanently de-identify personal information it is no longer needed for a legitimate purpose.
- c) ANPR/LPR data and metadata (including number plate images, plate text/OCR, and detected vehicle attributes such as make, model and colour) will be managed as part of the public safety camera system data.
- d) Council will:
 - i) limit the metadata fields collected to those required for the documented purpose(s);
 - ii) apply appropriate information security controls (including role-based access, strong authentication and monitoring) to prevent unauthorised access, modification or disclosure;
 - iii) maintain audit logs of access to and export of ANPR/LPR data and associated footage/records;
 - iv) retain ANPR/LPR data for no longer than necessary and, at a minimum, align retention with the CCTV footage retention period unless a longer

period is required for a lawful purpose (e.g. where data is downloaded or preserved for an investigation); and

- v) destroy or permanently de-identify ANPR/LPR data and metadata that is no longer required for a legitimate purpose, in accordance with Principle 5: Safeguards and Council's record keeping obligations.
- e) Where ANPR/LPR is used to create searchable records, Council will also implement reasonable measures to manage data quality (e.g. configuration to maximise accuracy, monitoring of error rates, and procedures for corrective or annotating records where an error is identified) and to ensure that any export or sharing of ANPR/LPR records occurs only in accordance with this policy, the MoU and applicable legislation.

8 Viewing of Footage

- a) The MoU between Council and Tasmania Police establishes the principles, protocols, roles and responsibilities regarding access to viewing, relating and copying of recorded footage and still images.
- b) Council will only release images to parties other than Tasmania Police in the following circumstances:
 - i) upon request from any other entity or individual on a case-by-case basis where it is lawful to do so. Please note Council may be prohibited from releasing CCTV images or associated metadata to you under the Privacy Laws where that footage or metadata contains personal information of third parties, including where a person other than yourself is reasonably identifiable;
 - ii) upon request from a local, state or federal government entity or agency fulfilling a legitimate, lawful purpose;
 - iii) upon request from any other entity or individual on a case-by-case basis where it is lawful to do so. Please note that Council may be prohibited from releasing CCTV images to you under the Privacy Laws where that footage contains the personal information of third parties, including where a person other than yourself is reasonably identifiable; or
 - iv) as otherwise permitted or required by law.
- c) Where these images may be related to a criminal or policing nature Council will liaise with Tasmania Police before responding to such request as per the MoU.
- d) Tasmania Police will respond to any formal public request that is of a criminal or

policing nature for images, footage or recordings generated by or captured on the public safety camera system.

9 Authorised Access

- a) Access to the public safety camera system including cameras, devices, wireless links, recording servers, ANPR/LPR functions, and associated metadata shall be limited to Authorised Council Officers and Tasmania Police.
- b) Council will document approvals for authorised access (including any ANPR/LPR roles) and will periodically review user access to ensure it remains appropriate and lawful.
- c) Where practicable, Council will separate system administration privileges from operational searching/viewing privileges (including for ANPR/LPR searching and exports) and will apply the principle of least privilege.
- d) In accordance with Principle 7: Operation and Control, only approved contractors will have access to the public safety camera system, with authority from Council and/or Tasmania Police, to undertake installation, maintenance and testing of the system. Operators of the system will act in accordance with the highest standards or probity and in accordance with public safety camera system policies and procedures.

10 Complaints

Complaints made by the public regarding the general operation of the public safety camera system will be referred to Council's complaint management process.

11 Variation

This policy may be reasonably varied, terminated or replaced by Council in its sole discretion from time to time.

12 Definitions

Reference	Description
Authorised Officer	Is a person, typically a council employee, officially appointed by the Chief Executive Officer, or the Council to administer and enforce specific by-laws, regulations and legislation. They are empowered to carry out tasks such as inspections, investigating breaches of legislation, issuing notices and enforcing compliance with council rules.

Reference	Description
Authorised User	Users authorised by Council to utilise public safety camera systems in accordance with this policy, including Tasmania Police authorised users.
Automatic Number Plate Recognition (ANPR)/License Plate Recognition (LPR)	Technology used with CCTV cameras to automatically detect and read vehicle registration plates from recorded images, including conversion of plate characters into searchable text (optical camera recognition), and creation of related metadata/analytical records.
ANPR/LPR Record	A structured entry generated by ANPR/LPR from CCTV images that may include plate text, capture date/time, camera/location identifier, plate/vehicle image(s), confidence score, and detected vehicle attributes (e.g. make, model, colour). It is generated from images and stored to enable searching and retrieval.
Chief Executive Officer (CEO)	The title Chief Executive Officer is a term of reference for the General Manager as appointed by Council pursuant to section 61 of the <i>Local Government Act 1993</i> ; and carries the same meaning for the purposes of the <i>Local Government Act 1993</i> and all other legislation administered by or concerning the Council.
Contractors	Security representative authorised to provide camera equipment, information technology and maintenance of the camera network. This may also include training and maintenance.
Council	Means Kentish Council and Latrobe Council.
Memorandum of Understanding	The agreement between Council and Tasmania Police relating to the ownership and operation of the public safety camera system.
Metadata	Information associated with images/footage recorded by the public safety camera system, which may include date/time, camera/location identifier, event identifiers and system/user audit information. Where ANPR/LPR is enabled, metadata may also include derived, searchable records such as plate text (OCR), confidence scores, vehicle images/crops, and vehicle

Reference	Description
	attributes such as make, model, colour and direction of travel. Metadata may constitute personal information.
Number Plate Data	Vehicle registration plate information captured by the public safety camera system, including the plate characters and (where applicable) associated image(s) of the vehicle and plate.
Public Safety Camera System	The physical camera system including cameras, wireless links, monitors, recording equipment and data management equipment. Referred to within the MoU as a CCTV system.
Public Domain/Precincts	Any place to which the public has access as of right or by invitation, whether express or implied. A public place relevant to Council can include, but is not limited to, public streets, public malls, shopping centres, council carparks, open space parks or reserves, swimming pools, airports, council managed public buildings or areas.
Unmanned Aerial Vehicle	An aircraft piloted by remote control or onboard computers.

13 Associated Documents and References

13.1 Legislation Reference

Public safety camera operations will be conducted in accordance with Commonwealth and Stage legislative requirements, which include:

- Privacy Act 1988 (Cth).
- ASIO Managers Guide – Various (Cth).
- Local Government Act 1993 (Tas).
- Anti-Discrimination Act 1998 (Tas).
- Personal Information and Protection Act 2004 (Tas) – exemption under section 14 (approved 12 February 2026; published in Tasmanian Government Gazette 18 February 2026) for councils within an MoU with Tasmania Police (as applicable).
- Australian Standards – the public safety camera systems prescribed within this

policy shall conform to, and be operated in accordance with, applicable Australian Standards.

13.2 Strategic Plan Reference

13.2.1 Kentish Council

Area	1	Governance and Organisational Development
Project	1.2	Governance
Objective	1.2	To provide consistent, accountable, transparent and effective governance of the Council
Strategy	1.2.3	Participate in relevant State and regional initiatives and partnership agreements

13.2.2 Latrobe Council

Area	1	Governance
Project	1.1	Advocacy and Leadership
Objective	1.1	Provide leadership and advocacy on behalf of our community
Strategy	1.1.1	Engage with State, Regional and Local Government bodies to promote local projects and development opportunities and resolve strategic issues affecting the municipal area

13.3 Other Associated Documents

- MoU between Council and Tasmania Police.
- Public safety camera system standard operating procedures where applicable (including ANPR/LPR configuration, access, audit, retention and disclosure processes).

APPROVED BY COUNCIL:

Kentish Council: 20 May 2026 Minute: 15.2

Latrobe Council: 25 May 2026 Minute: 15.1

EFFECTIVE DATE: 25 May 2026

ADMINISTERED BY: Chief Executive Officer

This policy will be reviewed periodically to ensure its relevance in terms of community needs and expectations and Council goals, targets, budget and statutory requirements.