

Guidance Note: Remote Inspections

Purpose

This guidance has been issued to clarify the Plumbers, Gasfitters, and Drainlayers Board's expectations on the use of remote inspections in the self-contained vehicle regulatory system.

Remote inspections

Remote inspections are an approach where inspection activities are conducted remotely using digital tools.

Instead of inspecting a vehicle in-person, inspectors may use live video streaming or review photographic evidence to assess a vehicle.

Relevant legislation

The certification of vehicles as self-contained is covered by the [Plumbers, Gasfitters, and Drainlayers Act 2006](#) (Act), the [Plumbers, Gasfitters, and Drainlayers \(Self-Contained Vehicles\) Regulations 2023](#) (Regulations), and the [Plumbers, Gasfitters, and Drainlayers Board \(Motor Vehicle Inspections\) Notice 2023](#) (Notice).

A certification authority must issue a certificate of self-containment if, following inspection of the vehicle by a vehicle inspector, it is satisfied that:

- the vehicle is equipped with a toilet that is permanently fixed to the vehicle and usable within the vehicle; and
- it meets the requirements for self-containment prescribed in the Regulations.

The Board's expectations on the use of remote inspections

Vehicle inspections should be carried out in-person wherever possible

The Board's views on the matter of remote inspections are as follows:

- While the Act, Regulations, and Notice do not specify that a vehicle must be inspected in-person, the Board's expectation, as stated in our [Vehicle Inspection Guidance](#), is that inspections are carried out in-person wherever possible.

- The Board recognises that remote inspections will present challenges and limitations that, if not well managed, are more likely to result in certification decisions being based on inaccurate and/or incomplete inspection information.
- In some circumstances it may be appropriate for inspections to be carried out remotely, for example, where a vehicle is located in an area with limited access to a certification authority.
- Where a vehicle is located in an area with access to other certification authorities that could provide in-person inspections, we would consider the provision of remote services in that instance to be inappropriate.
- Where remote inspections are carried out the Board's [recommended vehicle inspection form](#) (or similar) should be used to ensure that the assessment and findings are recorded in sufficient detail alongside any live stream video footage and/or photographs from the inspection.
- A remote inspection should ideally be carried out over live stream video allowing for a real-time, two-way dialogue and sighting of equipment between the inspector and the vehicle owner.
- Any certification authority who provides a remote inspection should clearly record the reason(s) for doing so, and how they have managed the risks arising from not carrying out an in-person inspection, on the vehicle inspection form and/or in-house files for auditing purposes.

If a certification authority issues a certificate where it could not be satisfied that the vehicle meets the requirements for self-containment from the information it has collected from a remote vehicle inspection, then that certification authority would not be carrying out its core functions lawfully and may risk losing its appointment.

Types of remote inspection

Live stream

Inspectors conduct live stream video inspections by directing the client around the vehicle throughout the inspection. Maintaining continuous communications during the remote inspection, the inspector can capture digital images and recordings as a record of compliance.

This type of inspection is similar to an in-person inspection, taking place in real-time, with the key difference being that the inspector is remote and making compliance decisions based on what they are seeing through the live stream.

Records, decisions, and reasons for decisions are captured on inspection checklists, as they would be during an in-person inspection.

Reliable internet connectivity at the inspection site is crucial for effective live stream inspections.

Evidence based

The client submits photo and/or video evidence of the vehicles self-containment facilities to the vehicle inspector for assessment.

This approach could be suitable for lower-risk work (i.e. inspecting a commercial fleet with identical vehicles, after inspecting the primary vehicle(s) in-person, reinspection of a vehicle previously inspected in-person following corrective actions being applied etc).

We note that quality imagery will be required along with clear requirements from the vehicle inspector to the client on what will be accepted as evidence.

We would expect that certification authorities and their vehicle inspectors would require photo and/or video evidence of the following:

- general external photo including the registration plate
- general overview of interior
- general overview of the self-containment facilities
- more detailed evidence of the self-containment facilities, including:
 - the toilet, it's fixing to the floor, and it's usability within the vehicle
 - the sink (and undersink)
 - the rubbish bin
 - all water/waste tanks
 - any pumps
 - any tank discharge/filling connections
 - any vents (for air or from waste tanks)
 - any taps/shower
 - any waste traps connected to plumbing fixtures
 - general photo to show type of water supply pipework.

Note that multiple parts of the self-containment facilities could be in in one photo as long as they can clearly be seen.

Vehicle inspectors must have the skills to effectively use remote inspection technology

Vehicle inspectors will need to be proficient in the remote inspection tools the certification authority adopts. This will include understanding verification techniques and adapting to unexpected situations that may arise during a remote inspection.

Key skills and competencies are likely to include:

- **Technical proficiency:** Vehicle inspectors demonstrate a high level of technical ability with the remote inspection tools, ensuring they can operate the technology seamlessly.

- **Image/recording capture:** Vehicle inspectors need to capture appropriate images/recordings to collect evidence suitable for verifying compliance with the self-containment specifications. These images will need to be appropriately stored, as well as being accessible when required.
- **Interpersonal and communications skills:** These are critical for guiding clients through live stream inspections. Vehicle inspectors must clearly communicate their expectations, instruct clients on where to direct their devices, and maximise the evidence capture process.
- **Problem solving abilities:** Vehicle inspectors may need to adapt their inspection techniques to address any limitations that may arise with access or visibility.

Certification authorities may need to provide guidelines on the quality and level of evidence required when capturing digital information, to ensure vehicle inspectors can gather the appropriate level of evidence, as they would during an in-person inspection.

Clients involved in remote inspections will also need to be competent in using the chosen technologies and have a good understanding of the vehicle inspector's expectations. This can be supported by providing information such as explanatory factsheets or video examples.

Challenges and limitations

The use of remote inspections will present some challenges and limitations that certification authorities adopting it will need to manage to ensure the effectiveness of inspections. Practical solutions for these issues will need to be incorporated into the remote inspection process. For example, some challenges and limitations such as these will need to be addressed in the remote inspection process:

- The vehicle inspector working with the client during a remote inspection must be able to ensure that there are no leaks in the sealed system and that all components are adequately secured. This will require a practical solution to ensure this requirement can be tested and signed off as being met.
- For late model vehicles with false floors and walls that house pipes and vents or tanks fitted flush under floors, the vehicle inspector must find a solution with the client during a remote inspection to inspect those items. If the vehicle owner doesn't have the tools (e.g. an endoscope camera) to support the inspection, then there would be little point starting a remote inspection of this type.