

Guidance Note: Taking photo evidence to support self-containment inspections

Purpose

This guidance has been issued to clarify the Plumbers, Gasfitters, and Drainlayers Board's expectations on the use of photo evidence to support your consideration of inspection findings for smaller converted vehicles before issuing self-containment certification.

The Board considers the need for photo evidence to be particularly relevant where:

- a portable toilet model has been retrospectively fixed to a vehicle, or
- there could be some concerns/questions about the usability of the toilet inside the vehicle, or
- a vehicle inspector has needed to provide more detailed notes than usual for a particular aspect of the self-containment facilities.

Relevant legislation

Section 87U(3) of the [Plumbers, Gasfitters, and Drainlayers Act 2006](#) (Act), provides that certification authorities are required to consider the findings of an inspection and issue a certificate of self-containment if satisfied of the following specified matters:

- the vehicle is equipped with a toilet that is permanently fixed to and usable within the vehicle;
- the vehicle meets the requirements for self-containment prescribed by regulations; and
- the person applying for the certificate has paid the levy.

Recommended practice

Photos capture the exact condition of the vehicle's self-containment facilities at the time of inspection, leaving no room for misinterpretation. This ensures that the vehicle owner, vehicle inspector, and certification authority all have a clear picture and understanding of the state of the vehicle's self-containment facilities.

Photos add a layer of transparency and credibility and can provide a wealth of information within seconds. Photos enable the reader to visualise the facilities clearly and accurately, instead of relying solely on textual descriptions in the inspection form.

Reviewing photos of the self-containment facilities in combination with the completed inspection form, will allow for a much clearer and quicker understanding for the Certification Authority of the state of the vehicle's self-containment facilities. This is particularly important when a certification

authority has a distributed network of vehicle inspectors and is not onsite to view a vehicle directly in order to verify an inspector's findings.

Photos of a vehicle's self-containment facilities will also support you to more quickly confirm the compliance of a vehicle that may be the subject of enquiries being made by the Board.

We would expect the photos include 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 under sink)
 - the rubbish bin
 - all water/waste tanks
 - any pumps
 - any tank discharge/filling connections
 - any vents (for air or from waste tanks)
 - any taps
 - 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.

Recent observations

The Board is aware of some instances where vehicle owners have subsequently changed the self-containment facilities of a vehicle (making it non-compliant) after passing inspection and gaining certification with a compliant vehicle. In this situation, having photos readily available to confirm the compliance of the vehicle at the time of inspection can help to quickly resolve any complaints being followed-up by the Board.

