

Remediation evidence guidance

Recording Video Walkarounds and Photographs at the Homeowner's Property

Guidance for Registered Businesses (RBs) undertaking Solid Wall Insulation (SWI), External Wall Insulation (EWI) and Internal Wall Insulation (IWI) remediation projects – the principles apply to all images captured in a homeowners property

1. Purpose and Scope

This guidance sets out what Registered Businesses (RBs) must consider when recording video walkarounds and taking photographs as part of the mandatory remediation evidence requirement for Solid Wall Insulation (SWI), External Wall Insulation (EWI) and Internal Wall Insulation (IWI) projects.

Video walkarounds and photographs are captured at a homeowner's property and may, in almost all cases, involve the processing of personal data. This means the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018) apply, regardless of the fact that the recording is being made for legitimate compliance and quality assurance purposes.

This guidance applies to the Registered Business (RB) carrying out the works and to the Retrofit Co-ordinator (RC) responsible for overseeing the walkaround process and photographic evidence collection. It should be read alongside TrustMark's mandatory communications on the video walkaround requirement and the wider Remediation Evidence Guide.

Why this matters

GDPR protects homeowners' rights relating to their privacy - ensure that all evidence focuses on what is required to evidence the remediation and take steps to protect the privacy of the homeowner. Please see the [GDPR guidance published by the ICO](#) it is your obligation to ensure you are compliant with applicable legislation.

2. Lawful Basis for Processing

RBs must be able to point to a lawful basis under Article 6 of the UK GDPR before recording. In most cases, one of the following will apply:

Lawful basis	When it applies
Legitimate interests	The recording or photograph is necessary to evidence remediation works and meet TrustMark scheme requirements, and this interest is not overridden by the homeowner's rights. This will be the most common basis for the walkaround and photographic evidence itself.
Consent	Where footage may capture the homeowner personally (for example, if they choose to appear on camera or provide a verbal statement), explicit consent should be obtained in addition to any other lawful basis relied upon for the works evidence itself.

Relying on legitimate interests does not remove the need to be transparent with the homeowner. RBs must still tell the homeowner that recording is taking place, why, and what will happen to the footage — this is a separate transparency obligation under Article 13 of the UK GDPR.

3. Homeowner Consent

3.1 When consent is required

Even where the walkaround or photography itself is justified under legitimate interests or contractual necessity, explicit homeowner consent should always be obtained before recording or photographing begins in the following circumstances:

- Before any recording starts inside the property, including communal or shared areas
- Where the homeowner, a family member, or a visitor may appear on camera or be heard on audio
- Where footage will be shared with a third party outside the RB, Certification Body (CB) and TrustMark (for example, an energy supplier or funder)
- Where the property is occupied by a tenant rather than the owner — consent should be sought from the occupier, not only the property owner

3.2 How to obtain and record consent

Consent must be freely given, specific, informed and unambiguous. RBs should:

- Explain, before arrival or on arrival, why the walkaround video and any photographs are being taken and how they will be used
- Confirm verbally with the homeowner that they are content for recording to take place, and record that confirmation (for example, a brief statement captured at the start of the video, or a signed consent form)
- Make clear that consent can be withdrawn at any time, including part-way through the visit

3.3 Withdrawal of consent

If a homeowner withdraws consent, the RB must stop recording immediately. Any footage already captured that the homeowner objects to, should be reviewed and, where it is not strictly necessary for compliance evidence, deleted.

4. What Should Be Recorded and Photographed

The purpose of the video walkaround and supporting photographs is to evidence the condition, installation and remediation of the insulation measure. Recording and photography should be focused and proportionate. RBs should capture:

- ✓ The external or internal wall areas directly relevant to the SWI/EWI/IWI measure
- ✓ Evidence of workmanship, materials, and installation detail required by PAS 2035/PAS 2030
- ✓ Ventilation provisions, damp-proofing detail, and any remedial work carried out
- ✓ Wide shots that establish location and context, limited to what is needed to verify the address and measure
- ✓ A brief verbal narration by the installer or Retrofit Co-ordinator describing what is being shown

5. What Should Not Be Recorded or Photographed

RBs must apply the data minimisation principle: only record what is necessary for the compliance and remediation purpose. The following should be avoided wherever possible:

- ✗ Close-up or identifiable footage of the homeowner, family members, children, or visitors.
- ✗ Footage inside rooms not relevant to the works (bedrooms, bathrooms) unless strictly necessary to evidence remediation
- ✗ Personal or sensitive items in shot — post or documents showing names and addresses, financial information, medication, or screens showing personal accounts
- ✗ Identifiable images of neighbouring properties, or neighbours and their vehicles
- ✗ Vehicle number plates, unless directly relevant to evidencing site access for the works
- ✗ Audio of private conversations not relevant to the walkaround
- ✗ Recording of vulnerable individuals (for example, children or dependants) beyond what is unavoidable to evidence the works

If in doubt, leave it out

If a shot is not needed to evidence the remediation works, don't capture it. Where personal items are unavoidably in view, consider re-framing the shot or asking the homeowner to move the item before recording.

6. Photograph-Specific Considerations

Still photographs raise a small number of additional points beyond those covered above for video. RBs should pay particular attention to the following when taking photographic evidence:

- Review each photograph before it is saved or uploaded to check that no unnecessary personal data has been captured in the background (for example, a reflection in a window, a mirror, or a glass door)
- Where a photograph is taken as part of a wider set (for example, before/during/after images of the same wall), apply the same consent and minimisation principles consistently across the whole set
- Store photographs in the same secure, access-controlled system used for video footage — do not leave images on a personal camera roll or personal cloud photo storage

7. On-Site Recording Practice

- Inform the homeowner verbally before recording starts, every time — do not rely on prior written notice alone
- State the purpose of the recording clearly at the start of the video (for example: "This walkaround is being recorded to evidence remediation works for [address] under the TrustMark scheme.")
- Keep recordings as short and focused as possible — only what is needed to evidence the works
- Pause or stop recording if entering an area not relevant to the works, or if a household member enters shot who has not consented to appear
- Do not record without the homeowner's knowledge under any circumstances
- Where a homeowner is not present (for example, void or vacant properties), confirm the recording basis and access authority with the client or landlord before proceeding

8. Storage, Retention and Security

Once recorded, footage must be handled in line with the RB's data protection policy and TrustMark's evidence retention requirements:

- Transfer footage to secure, access-controlled storage as soon as practicable after the visit — avoid leaving footage on personal devices
- Restrict access to footage to those who need it for compliance, quality assurance, or remediation purposes
- Retain footage only for as long as necessary to meet compliance, audit and remediation evidence requirements, in line with the RB's retention schedule and any TrustMark or scheme-specific retention period
- Securely delete footage once the retention period has expired, unless a longer period is required for an active non-compliance case or CoL voiding matter

9. Sharing and Access

Footage should only be shared with parties who have a legitimate need to see it as part of the compliance, audit, or remediation process. This typically includes the RB's own quality team and TrustMark.

Before sharing footage with any other third party (for example, an energy supplier, funder, or insurer), RBs should:

- Confirm there is a lawful basis and, where appropriate, homeowner consent for that specific sharing
- Share only the footage or extract that is relevant — do not share entire unedited recordings where a shorter, targeted extract will do
- Use secure transfer methods and confirm the receiving party will handle the data in line with UK GDPR

10. Roles and Responsibilities

Role	Responsibility
Retrofit Co-ordinator (RC)	Ensures the walkaround and photographic evidence collection are planned and carried out in line with this guidance, confirms homeowner consent is obtained and recorded, and oversees secure handling of footage and images.
Installer / on-site operative	Carries out the recording in line with the do's and don'ts in this guidance, stops recording if asked, and avoids capturing unnecessary personal data.
Registered Business (RB)	Acts as data controller for footage it captures, maintains a data protection policy, retention schedule, and breach reporting procedure, and ensures staff are briefed on this guidance.
TrustMark	Sets the minimum evidence and compliance requirements for walkaround footage and provides guidance and support to RBs on data protection matters relating to the scheme.

11. Quick Reference Checklist

- Have I told the homeowner, verbally, that I am recording and why?

- Have I obtained and recorded their consent, especially if they may appear on camera?
- Am I only recording what is needed to evidence the remediation works?
- Have I avoided capturing identifiable people, personal documents, and unrelated rooms?
- Will the footage be stored securely and only kept as long as necessary?
- Do I know who to contact if the homeowner withdraws consent or raises a concern?

This guidance is provided by TrustMark to support Registered Businesses in meeting their data protection obligations. It is not a substitute for independent legal advice. RBs should ensure their own data protection policies and staff training reflect these principles and consult their Data Protection Officer or legal adviser on specific cases.