

COVID 19 INQUIRY: MODULE 2A

WRITTEN CLOSING SUBMISSIONS
OF
THE NATIONAL POLICE CHIEFS' COUNCIL

Introduction

1. This document has been drafted on behalf of the National Police Chiefs' Council (NPCC) at the conclusion of the hearings in Module 2A of the UK Covid-19 Inquiry (**the Inquiry**). The purpose of these submissions is to assist the Chair by the provision of information on the topic of enforcement, and specifically policing, in the context of the Covid-19 pandemic.
2. The NPCC is a national co-ordinating body which provides a representative function for UK policing. It is a Core Participant in Modules 2, 2A, 2B and 2C of the Inquiry.

The role of the NPCC in Module 2A

3. The role and functions of the NPCC are set out in detail in the organisation's written opening submissions for Module 2 (dated 25 September 2023) and in the statement of former Assistant Commissioner Martin Hewitt.¹ Similarly, the NPCC has previously shared information on the purpose and day-to-day activities of the policing response to Covid-19, known as "Operation Talla".² This information, which is of equal application in Module 2A, is not repeated herein for reasons of brevity.
4. In Module 2A, the NPCC represents the interests of the Police Service of Scotland (PSoS). No individual force or police officer is a Core Participant in this Inquiry.

¹ INQ000216925 at §§4 – 21.

² *Inter alia*, in the statement of Martin Hewitt (INQ000216925 at §§31-46).

5. Detailed information about the history of PSoS and its governance arrangements is set out in the statement of T/DCC Alan Speirs.³ Mr Speirs led the operational response to the Covid-19 pandemic in Scotland. Although he was not called to give live evidence in Module 2A, his statement contains relevant information about the work which PSoS undertook in response to the pandemic.
6. While the NPCC is engaged in this Inquiry as part of its representative role for policing in the UK, it is important to note that it does not hold directive power over individual officers or police forces. The chief officers of each force retain operational power and independence and are able to derogate from the decisions of the Chief Constables' Council. This was confirmed in the evidence of Mr Hewitt.⁴ In keeping with this, the NPCC itself did not itself play a direct role in enforcement during the pandemic.

Policing during the pandemic

7. As set out in the statement of Alan Speirs, the policing response to Covid in Scotland was also called "Operation Talla". The name originated from PSoS when it established the response and command structure following a Scottish Government Resilience Room meeting on 29 January 2020, and it was subsequently adopted by other forces. Recognising the immediate risk posed by the virus, PSoS responded rapidly, with the first Operation Talla Gold Group meeting held on the same day.
8. The work of PSoS during the pandemic was not limited to enforcement of the coronavirus regulations. Operation Talla encompassed a broad range of tasks which were divided into portfolios, including business continuity, logistics, statistical information and health and safety matters. Business continuity included the maintenance of ordinary policing work in the context of a national emergency. PSoS had to ensure that its responsibilities in areas as diverse as criminal justice, intelligence, counter-terrorism, deradicalization, civil orders, domestic abuse, licensing and more were upheld.

³ INQ000257360 at §§4-13.

⁴ Transcript of 09/11/2023 from 7/21 – 8/5.

9. This work had to be continued with both decreased staffing due to increased absence levels and the additional weight of exercising new public health policing responsibilities. As Dame Priti Patel stated in her evidence to the Inquiry during Module 2, the police had been asked “to almost do the impossible”,⁵ and, as Humza Yousaf stated in his evidence, police were “*absolutely integral to our public health efforts.*”⁶
10. In some ways, PSoS had an additional burden of work during the pandemic. Although it received NPCC guidance and briefings, and while some could be implemented directly (such as the Four Es guidance), in many cases PSoS was required to draft its own briefings or adapt NPCC briefings to the different provisions of Scottish regulations.⁷ In this respect, divergence between devolved administrations when implementing coronavirus regulations had real implications for policing.
11. One of the core priorities for PSoS during the pandemic was ensuring that its guidance and briefings were fully informed by the needs of those directly affected by coronavirus restrictions, and in particular the needs of vulnerable and minority groups. This was an iterative process, requiring ongoing consultation as the virus and the consequent regulations changed over time.
12. The statement of Alan Speirs sets out some examples of the consultation and engagement work undertaken by PSoS.⁸ There were many workstreams, including but not limited to: i) drafting guidance advising the police on engaging with vulnerable groups, e.g. victims of domestic abuse, persons with autism spectrum disorders or mental health conditions, ii) working to promote outreach and accessibility for particular communities, e.g. the Chinese community in the context of increasing racially motivated crime during the pandemic, and iii) identifying practical adjustments to accommodate the needs of vulnerable groups, e.g. obtaining see-through face masks for persons who lip-read and issuing accessible BSL guidance on the coronavirus regulations.

⁵ Transcript of 09/11/2023 at 106/1-2.

⁶ Transcript of 25/01/2024 at 168/3-7.

⁷ INQ000257360 at §31.

⁸ INQ000257360 at §§48-56.

13. Each workstream was directly informed by consultation between the PSoS Partnerships, Prevention and Community Wellbeing, Equality & Diversity unit and stakeholder representatives. Wherever possible, PSoS sought to co-produce guidance with those who were directly affected. Information received was recorded and retained to improve future policing responses as part of internal lesson learning processes.
14. The lesson learning processes began during the pandemic and are ongoing. They have been coordinated by the Organisational Learning Group, which was created early in the pandemic to act as a central learning repository for lessons identified by Operation Talla, including those shared by staff, partners and policing networks.
15. The first limb of the lesson-learning processes was the “Renewal and Continuous Improvement Strategy”, which encompassed elements of recovery following the pandemic and also the implementation of learning to improve processes and service delivery. This project was managed by the Renewal and Continuous Improvement Group.
16. In addition, PSoS commissioned the Organisational Learning Group to draft an Organisational Scoping Report⁹ to identify learning arising from the period between January 2020 – June 2020. The Report, which contained 27 learning recommendations, was published on 10 July 2020 and has been shared with the Inquiry and circulated within PSoS for implementation.
17. The third limb is the debrief project, which sought to ensure that the views of PSoS staff and frontline officers were recorded and fed into the other learning limbs. This project was led by T/DCC Alan Speirs. The resulting report¹⁰, which has been shared with the Inquiry, includes discursive observations from staff and officers, as well as fifteen recommendations for best practice.

The Independent Advisory Group

⁹ AS/02 – INQ000232510.

¹⁰ AS/03 – INQ000232508.

18. The Inquiry has heard evidence from multiple sources about the valuable role which the Independent Advisory Group on the Police Use of Temporary Powers related to the Coronavirus Crisis (**the IAG**) played in providing assurance and oversight of policing in Scotland. The role and functions of the IAG is addressed at high level in the statement of Alan Speirs.¹¹
19. The evidence demonstrates that the IAG was a uniquely independent body. Although it was created by PSoS, it was not answerable to it. The IAG's data analysis was carried out by third party academics and its reports were provided directly to the Scottish Police Authority and published online.
20. Professor McVie, in her evidence, sought to comment on the reasons for the creation of the IAG by setting out her views of what the Chief Constable may have been thinking at the time.¹² The reasons from a policing perspective are set out in the statement of Alan Speirs, including ensuring that police powers were being used appropriately and that enforcement remained a last resort, and to provide a monitoring and assurance function.¹³
21. The IAG was supported by Operation Talla Information Collation, Assurance and Liaison (**OpTICAL**), a sub-group within Operation Talla. The role of OpTICAL was to provide data and administrative support to the IAG and to Professor McVie.¹⁴
22. PSoS has disclosed to the Inquiry a list of the members of the IAG and copies of the group's minutes. These documents demonstrate the calibre of participants in the IAG, such as Lord Scott KC, Bruce Adamson (the Children and Young People's Commissioner), Aamer Anwar, and representatives of human rights and third sector organisations.
23. The Inquiry has also heard from Professor McVie about the complex analysis of data which was undertaken by the IAG in order to inform government decision-making on enforcement.

¹¹ INQ000257360 at §§67-69.

¹² Transcript of 24/01/2024 at 168/1-10.

¹³ INQ000257360 at §§67-69.

¹⁴ Transcript of 24/01/2024 at 170/8.

CVI

24. The Chair has received evidence from both Professor McVie and Alan Speirs¹⁵ about the Coronavirus Intervention application (CVI). This is a bespoke computer system which was conceived, built and implemented by Police Scotland early in the pandemic, with what Professor McVie described as “a great degree of foresight”¹⁶. The system was operational by mid-April 2020.
25. At a time when access to rapid and reliable data was critical for police, for the Scottish Government and for modellers, Police Scotland took the initiative to create a computer system capable of recording Covid-related interactions for analysis by the IAG and others.
26. As set out above, this analysis was published and shared by PSoS in order to inform decision-makers assessing policy options in relation to enforcement. PSoS made the data available online and facilitated the publication of IAG analysis. There was also a series of public webinars which were run through the IAG to ensure scrutiny and discussion of the data during the pandemic.
27. It is only because the CVI system was created, and because PSoS proactively published the data which it collated, that the IAG and the Inquiry have been able to scrutinise the actions of the police when engaging with members of the public during the pandemic.

The Four Es guidance

28. In both Module 2 and Module 2A, the Inquiry has heard evidence about the Four Es guidance which was drafted by the NPCC.¹⁷ The guidance lay at the heart of the work undertaken by PSoS during the pandemic and it remained unchanged throughout the relevant period.
29. The key evidence before the Inquiry in relation to the application of the Four Es guidance is summarised below:

¹⁵ INQ000257360 at §§33-35.

¹⁶ Transcript of 24/01/2024 at 171/17.

¹⁷ Information about the Four Es guidance was set out in the written closing submissions of the NPCC in Module 2 at §§21-26.

- a. Alan Speirs described the Four Es guidance in his statement as being “at the forefront of all decision-making for the enforcement of Covid-19 regulations”;¹⁸
- b. Humza Yousaf spoke about the consistent emphasis placed upon the Four Es guidance (and in particular on the first three Es) by the Chief Constable in their interactions during the pandemic;¹⁹
- c. Professor McVie said that the guidance was a “really valuable tool”²⁰ and stated that the drafting of the guidance was borne of a “genuine desire by policing organisations to ensure any impact that policing might have in the context of the pandemic would be as minimal as possible on the basis that there was an understanding there might be wider inequalities”²¹. She said that she was “confident that the police in Scotland were following the Four Es strategy”²²;
- d. Professor Reicher concluded that the Four Es guidance was successful in securing adherence to restrictions while avoiding tension, alienation and conflict.²³

The role of FPNs in enforcement

30. As one route for the exercise of the fourth E, Fixed Penalty Notices (**FPNs**) formed only a small subsection of the issue of the enforcement of coronavirus regulations (which is itself a sub-topic within this Module). In that context, it is perhaps surprising that non-police witnesses have been asked such detailed questions about the statistical analysis and practical application of FPNs in this Module.

31. Nonetheless, the NPCC has sought to address questions raised about the efficacy and/or appropriateness of FPNs as an enforcement mechanism in the sections which follow. These are matters which were raised in evidence during the Module 2A hearings with both Professor McVie and Humza Yousaf, but which have not been put to any policing witness by the Inquiry.

¹⁸ INQ000257360 at §§24-25 and §46.

¹⁹ Transcript of 25/01/2024 at 160/11-19.

²⁰ Transcript of 24/01/2024 at 193/19.

²¹ Transcript of 24/01/2024 at 191/22.

²² Transcript of 24/01/2024 at 193/15-17.

²³ INQ000370347 at §148.

32. When considering the questions which follow, it is important to take into account the following propositions identified in IAG analysis of the CVI data:

- i. First, as Professor McVie observed at §11.1 of her statement, “prevalence of enforcement was very low”, affecting less than 0.5% of Scotland’s adult population. When we speak about disparity, it is helpful to maintain perspective: the total number of FPNs issued to black, African or Caribbean people from 27 March 2020 – 31 May 2021 was 395, out of a population of some five and a half million people²⁴;
- ii. Second, of all encounters between the police and public during the pandemic, 88% were resolved using the first three Es, without ever reaching the stage of enforcement. Professor McVie observed that this was a “conservative” estimate,²⁵ and the current First Minister’s understanding is that the figure might be as high as 94%;²⁶
- iii. Third, less than 0.7% of encounters between the police and the public resulted in an arrest. Again, this is a conservative estimate.

33. The above statistics have been caveated on the basis that the figures captured by CVI may be ‘conservative’. This is because use of the fourth E was recorded consistently due to the separate formal processes resulting from the issuance of an FPN or an arrest. CVI statistics on the fourth E can be corroborated by other data sources, including court records and FPN payment processing. In contrast, statistics on the use of the first three Es relied upon officers proactively making an entry on the CVI system. It is therefore possible that some interactions, particularly the briefest interactions which were resolved using only the first E, may have been omitted from the statistics.

34. In light of the above, examining the topic of enforcement primarily by reference to FPNs gives the Inquiry only a partial and potentially misleading picture. FPNs were a single element of the police approach to securing regulatory compliance during the pandemic.

²⁴ INQ000369770_0025.

²⁵ Transcript of 24/01/2024 at 194/4.

²⁶ Transcript of 25/01/2024 at 149/24-150/3.

Whether to use FPNs/enforcement measures at all

35. The first enforcement question which was raised in evidence with Professor McVie is whether FPNs should have been used by the Scottish Government as a mechanism to promote compliance with the regulations. This includes consideration of whether any form of enforcement was appropriate and whether, of the available options, an FPN framework was the most effective. Questions related to this issue were put to both Professor McVie and Humza Yousaf, but not to any policing witness.
36. As of the conclusion of the Module 2A hearings, the Inquiry has not received clear evidence on this topic. Professor McVie observed in evidence that no or limited academic research has been conducted from which conclusions can be drawn and further investigation would be required.²⁷
37. Opposing views were shared with the Inquiry by independent academics: Professor McVie suggested that fines should be lower or replaced with formal warnings to minimise the financial impact on those breaching the regulations²⁸, whereas Professor Reicher flagged the risk of creating resentment and tension in the community if breaches were not appropriately punished²⁹. In his evidence on 25 January 2024, Humza Yousaf emphasised the Scottish Government's focus on the importance of deterrence measures as the rationale for utilising an FPN framework.³⁰
38. In this context, it is important to note that the decision to use an FPN framework was not one which was made by the police. The only evidence available indicates that Police Scotland was consulted on logistics and implementation after the decision to use FPNs was already "final".³¹ Mr Yousaf was clear in his oral evidence that this was a decision made by the Government.³²

²⁷ INQ000369767 at §8.5; §29.2.

²⁸ Transcript of 24/01/2024 at 209/22.

²⁹ INQ000273800 at §147.

³⁰ Transcript of 25/01/2024 at 149/13.

³¹ INQ000371693_0005.

³² Transcript of 25/01/2024 at 142/9.

39. Ultimately, given the limited time devoted to this complex issue in the context of the Module 2A hearings, as well as the absence of any relevant academic research, the NPCC submits that the evidence is insufficiently clear for the Inquiry to reach a determination on this topic. While the efficacy of fines in the criminal justice system is an interesting academic question for criminologists, it is of limited relevance to this Inquiry because, in the broader context of the pandemic, FPNs affected only a very small minority of the population.

The level of FPNs in Scotland

40. The second question relates to the value of fines imposed in Scotland. Professor McVie expressed concern about the use of incremental increases for repeat offending taking the fines to £960 for a fifth breach of the regulations, which she said was not “light touch” and was “out of alignment” with the level of fines issued by the Procurator Fiscal in Scotland (which she explained could be up to £500 from April 2020).³³

41. Again, it is important to note in this context that Police Scotland did not determine the value of the fines issued, as Mr Yousaf indicated in his evidence.³⁴ This was a decision of the Scottish Government and the Lord Advocate.³⁵

42. Moreover, the Inquiry may consider that the concerns expressed by Professor McVie on this topic are of limited application in Module 2A, as Professor Reicher is clear in his statement that, in practice, no fine over £480 was ever issued in Scotland.³⁶

The application of FPNs to persons under 18

43. The third question which was put to both Professor McVie and Mr Yousaf in evidence (though not to any policing witness) relates to the imposition of age limits for recipients of FPNs.

³³ Transcript of 24/01/2024 at 189/4 – 190/6.

³⁴ Transcript of 25/01/2024 at 142/9.

³⁵ INQ000257360 at §37.

³⁶ INQ000273800 at §148.

44. As the Inquiry is aware, when the FPN framework was first introduced, it was possible for enforcing authorities to issue fines to persons over the age of 16. This mirrored the ASB FPN framework upon which the coronavirus FPNs were based. This was not a decision taken by Police Scotland, but by the Scottish Government. The age limits were reviewed by the Lord Advocate shortly thereafter and the minimum age was raised to 18 from 27 May 2020. The period of time when it was possible for a person under the age of 18 to receive an FPN was therefore approximately two months.
45. Professor McVie's evidence on this topic appears to have been drawn from a single email chain within the Scottish Government which was obtained through an FOI request by a third party.³⁷ That email chain, although is the only evidence available to the Inquiry on this topic, cannot give a complete picture of the discussions undertaken or the rationale relied upon for the introduction of the FPN framework.
46. Professor McVie's observation in oral evidence that "... in some ways I think Police Scotland had quite a big influence on the decision to maintain that – to maintain 16, 17-year olds within the legislation as opposed to the English legislation"³⁸ is speculative and wholly without basis in evidence. It is not supported by the email chain at INQ000371693 and it cannot have been drawn from personal knowledge, as Professor McVie played no role in the discussions or decision-making of the Government or the police at the relevant time. It is also uncorroborated by oral evidence, as the proposition was not put to any Scottish Government minister or official involved in making this decision.
47. It is important to note that, as set out in the evidence of Alan Speirs³⁹, PSoS actively supported amending the Lord Advocate's guidelines so that persons under the age of 18 were no longer able to receive an FPN.
48. Professor McVie has given evidence that a number of FPNs were issued to persons under 18 after the guidance was changed. In her oral evidence, she

³⁷ INQ000371693.

³⁸ Transcript of 24/01/2024 at 184/11-15.

³⁹ INQ000257360 at §§44-45.

explained that this was likely due to error, including in cases where the age of the person in breach of the regulations was not known to police at the time when the FPN was issued. PSoS can confirm that each of the small number of FPNs issued to persons under the age of 18 were rescinded.

Policing assessments

49. The fourth question which the Inquiry has raised in relation to the use of FPNs is whether it was appropriate for police officers to be required to undertake proportionality assessments when issuing FPNs, given the potentially broad scope of the coronavirus regulations as compared to, e.g. a speeding offence.
50. The position of the NPCC is that only policing witnesses can speak with authority to the experience of undertaking such judgments, or to the training and approach applied when exercising policing powers. In the absence of such evidence, the Inquiry should refrain from making findings on this specific topic.
51. Although the coronavirus regulations were new to officers, it is important to remember that the exercise of judgment and the use of proportionality assessments was not. The responsibility to ensure proportionate and non-discriminatory enforcement exists in **all** policing activity, as emphasised by Martin Hewitt in his evidence to the Inquiry in Module 2⁴⁰ and as acknowledged by Mr Yousaf in his evidence in Module 2A.⁴¹ It is also an integral part of issuing the ASB FPNs which Professor McVie referred to as the framework upon which coronavirus FPNs were based.⁴²
52. There is also a strong public interest in retaining scope for officers to make individual judgments regarding necessity and proportionality, as it is critical to the model of policing by consent and the rule of law. Allowing officers to assess a situation and apply the Four Es guidance in a stepped approach ensures that the immeasurably broad range of possible scenarios which officers may encounter can be addressed within a single framework. It also

⁴⁰ Transcript of 09/11/2023, at 90/15-23

⁴¹ Transcript of 25/01/2024 at 144/16.

⁴² Transcript of 24/01/2024 at 183/19-25.

allows officers to take into account inequalities and the impact of the pandemic upon vulnerable groups when making decisions about how to respond to potential breaches.

Disproportionality in the context of FPNs

53. While the NPCC fully accepts the contents and conclusions of the FPN reports undertaken by Professor McVie, the question of disproportionality in the issuing of FPNs is complex, requiring detailed investigation before any determination could be made by the Inquiry. It is important always to recall that when considering the evidence concerning fixed penalty notices, it reflects a tiny minority of the occasions on which the police interacted with the public in relation to the regulations, meaning in turn that the subdivision of FPN data reflects small percentages of that tiny minority of interactions.
54. While it is an important topic, it is, quite properly, not a matter which has been the subject of detailed investigation in this Module.
55. The current state of the evidence is as follows: when asked by the Inquiry about whether the CVI data disclosed disparity which is attributable to disproportionate policing of certain groups, Professor McVie said:

“We’ve been very careful in the reports that we’ve published to say that the analysis that we’ve done cannot be used to determine whether there was disproportionate or bias in actual policing. So, in order to know whether there was bias in policing, you would need to know the level of compliance within each of these groups, you would need to know how many of those individuals had been encountered by the police, and then you’d need to know how many of them they fined. We simply don’t have that information. So it’s impossible to say that there was any disproportionality in terms of the way in which the police were approaching.”⁴³

56. In light of this clear and unambiguous statement from the author of the FPN analysis reports, there is insufficient evidence for the Inquiry to make a

⁴³ Transcript of 24/01/2024 at 196/8-20.

positive finding that there was disproportionality or bias on the part of the police in the issuing of FPNs during the pandemic.

Border policing

57. There has been mention in the evidence of Professor McVie and Humza Yousaf of the response of the Chief Constable of PSoS to requests from the Scottish Government to change or increase policing of the border between England and Scotland during the pandemic.⁴⁴ This is not a topic which has been put to any policing witness. It would not be fair for the Inquiry to make findings about actions taken by the Chief Constable or about the rationale for his decision-making in the absence of direct evidence from PSoS.

58. In summary, the position of PSoS is that there was no change in approach in response to the introduction of new travel restrictions in December 2020. Instead, officers continued to rely upon the Four Es guidance and the model of policing by consent. Visible policing at border points was not increased and there were no roadblocks or vehicle checks directed for the purposes of enforcement. There was no border policing between parts of Scotland which were under different tier restrictions.

59. From time to time, in response to the changing prevalence of the virus, the Road Policing presence on certain arterial routes was increased in order to build trust, provide reassurance to the public and to ensure compliance with the restrictions in a way that was proportionate and logistically achievable for PSoS.

Clarity of legislation and guidance

60. The Inquiry has heard evidence about the extent to which a lack of clarity in legislation, regulations and guidance, or frequent/late amendments by the Scottish Government, may have caused confusion for the public and the police.

⁴⁴ Transcript of 24/01/2024 at 205/7 – 206/24; Transcript of 25/01/2024 at 146/22 – 148/13; INQ000369767 at §26.2.

61. The method and quality of legislative drafting is a matter for the Inquiry and the NPCC does not seek to comment upon this topic.

62. As described in the statement of Mr Speirs⁴⁵, although the short timescales and dynamic nature of legislative and regulatory changes did pose challenges for PSoS during the pandemic, officers worked hard over long hours to ensure that appropriate guidance was drafted and circulated to officers. Sometimes, changes at late notice were the result of last-minute judicial challenge rather than delays in consultation. As Professor McVie said in her oral evidence:

“Now, I have to say that certainly in Scotland, Police Scotland took a very pragmatic approach to changes in regulations and they never wavered from emphasising the four Es approach and trying to minimise potential impact of any new regulations.”

63. Despite the challenges, the existence of effective channels of communication between PSoS and the Scottish Government meant that confusion or uncertainty could generally be addressed quickly. Overall, PSoS and the Scottish Government cooperated and worked well together in the difficult context of a national crisis.

64. Where Professor McVie has purported to set out the general views of police officers on this topic, this evidence should be treated with caution. Her views are based on i) unspecified second-hand comments from unidentified participants in the IAG; and ii) the results of a small number of interviews undertaken with unidentified police officers.⁴⁶ Professor McVie accepted in evidence that her comments relied on interviews with only c.30 officers (out of more than 17,000 within PSoS at the relevant time).⁴⁷ It is not clear from the evidence before the Inquiry whether those officers who participated in interviews were senior decision-makers, administrative staff or frontline officers, but the sample size is limited and is not sufficient to justify broad statements of general application about the views of police officers. It is not apparent from the evidence that such views were widely held. Direct evidence from the police about the experience of policing should be preferred.

⁴⁵ INQ000257360 at §§60-64.

⁴⁶ Transcript of 24/01/2024 at 200/18 – 201/2.

⁴⁷ Transcript of 24/01/2024 at 166/2.

Conclusion

65. The NPCC represents thousands of officers from every force across the UK. Each had a different experience of the pandemic, but there are some factors which are common to all: perseverance with challenging work even as the majority of the country entered lockdown, flexibility to adapt to novel rules and responsibilities in the evolving public health sphere, and resolve to protect others despite the very real risk to their own health, welfare and loved ones. This is true of PSoS, just as it is true of each force and of the NPCC's officers.
66. There are multiple examples of positive practice on the part of PSoS during the pandemic. From the early action by Operation Talla in January 2020, to the creation of the CVI system, to the continuous consultation with stakeholders from vulnerable groups, PSoS sought to innovate and adapt to the extraordinary circumstances of the pandemic at pace.