

The UK Covid-19 Inquiry

Written opening statement of the British Business Bank in Module 9

Introduction

1. This written opening statement is made on behalf of the British Business Bank (**'the Bank'**). The Bank is an economic development bank that supports small and medium-sized enterprises by working with lenders and other financial institutions rather than by lending directly. The Bank is wholly owned by the government but operates independently.¹
2. During the pandemic, the Bank was tasked by government with launching and operating schemes to support businesses. These schemes set out terms on which lenders (such as banks, non-bank and community development financial institutions) could agree to lend to businesses with the backing of a government guarantee under certain conditions.
3. The Bank recognises the significant impact which the pandemic had, not just on businesses, but on individuals. The Bank offers its sincere condolences to those who lost loved ones or who suffered in any way as a result of the pandemic. The challenges which businesses and individuals faced during the pandemic are drawn into sharp focus by 'Every Story Matters' for Module 9. The Bank is grateful to those who have shared their experience and acknowledges that there were businesses which could not access finance through the schemes despite being impacted by the pandemic.
4. The Bank also recognises its own staff, who worked to deliver the schemes. It is a tribute to their hard work and tenacity that the Bank was able to discharge its role, at scale, and that the Bank was able to provide the schemes at a time which was, for many staff, also personally very difficult. Together with those within the lenders, and government, the Bank's staff worked ceaselessly to achieve an unprecedented task, and had a significant effect on the survival of many businesses and jobs during the pandemic.
5. These were schemes where the government was required to make a number of decisions in extraordinary circumstances. The priority given by government to speed did entail risk, and the Bank provided clear advice in relation to the risks of each

¹ During the pandemic the shareholder was the Secretary of State for the Department for Business, Energy and Industrial Strategy (**'BEIS'**)

scheme, going as far as to raise reservation notices in relation to the risks of two schemes. The Bank then worked hard especially on counter fraud measures to mitigate those risks during delivery. The impact of the schemes is undoubted: from data as at the end of June 2025, around £82 billion of finance was delivered². It is estimated that the schemes provided tens of billions of additional Gross Value Added to the UK economy, and hundreds of thousands of businesses together with up to 3.5 million jobs were saved. The latest available data for CBILS, CLBILS and BBLs shows that up to the end of June 2025, £26.51 billion has been repaid by borrowers and the cost to government in paying out on the government guarantee that enabled this lending has been £12.22 billion. Overall, the economic benefit of the schemes is on track to outweigh their cost – but much can be learnt for the future.

6. The schemes delivered by the Bank were:
 - a. The Coronavirus Business Interruption Loan Scheme (**'CBILS'**),
 - b. The Coronavirus Large Business Interruption Loan Scheme (**'CLBILS'**),
 - c. The Bounce Back Loan Scheme (**'BBLs'**),
 - d. The Future Fund (where the government made direct investments into companies via convertible loans), and
 - e. The Recovery Loan Scheme (**'RLS'**).

7. Aside from Future Fund, these were 'delegated loan guarantee schemes', where lenders were accredited by the Bank to offer lending to businesses and the self-employed. The government would, under certain conditions, guarantee the loans or a proportion of them. The borrower remains responsible for repayment of the loan, unless there are genuine circumstances which make that impossible. The government guarantees ensured lenders were willing and able to provide billions of pounds of lending and investment, meaning that businesses could stay afloat and jobs could be saved. The cost of payment out on the government guarantee is naturally a matter of public interest, as is the rate of error and fraud.

² Data for CBILS, CLBILS, BBLs (£76.85 billion) from the 'COVID-19 loan guarantee schemes repayment data: June 2025', published 5 September 2025 on gov.uk; data for FF (£1.14 billion) from the 'Year 3: Future Fund Evaluation Report', published 9 September 2025 on the Bank's website; and data for RLS (£4.33 billion) from RLS (iterations 1 & 2) Performance Data as at 30 June 2025, published 26 August 2025 on the Bank's website.

8. The risks of all the schemes were recognised by all involved at the time. In the event, while any level of loss, whether credit, fraud or error, in such schemes is unwelcome, the rate of loss is lower than had been initially feared. These were unprecedented schemes for unprecedented times, and while the Bank is proud of its role in delivering them, there is much that can be learnt from the experience. The Bank is here to assist the Inquiry where possible, to ensure the record is accurate and to listen and learn for the future.

The Bank in overview

9. The Bank³ was established in 2014. It works closely with the finance sector and other participants in the market to make finance markets work better – so businesses in the UK can start, scale and stay in the UK. The Bank provides improved access to finance, provides independent and impartial information, and builds strong regional networks – to enable the success of hundreds of thousands of smaller businesses across the UK.
10. The Bank generally does not lend directly to smaller businesses, but works with over 200 ‘delivery partners’ such as fund managers, regional angel syndicates and accredited lenders to increase finance for smaller UK businesses. These lenders include banks, non-bank and community development financial institutions. The Bank also invests directly in businesses through its direct investment and co-investment programmes, as well as indirectly through funds.

Pre-Covid

11. One of the strategic objectives of the Bank in 2020 was to be the centre of expertise for smaller business finance in the UK, providing advice and support for the government. Before the pandemic, the Bank employed around 250 people and was supporting 98,000 businesses with £8 billion of finance. Its schemes at the time included the Enterprise Finance Guarantee (**EFG**) scheme. The EFG scheme was one of the Bank's key programmes.

³ Which consists of British Business Bank PLC, which is the holding company of the Bank's various operating subsidiaries, including British Business Financial Services Limited (BBFSL), through which the Covid Schemes were implemented and are managed on behalf of the UK government.

During the pandemic

12. During the pandemic, the Bank changed significantly. As the Inquiry will have heard from many organisations, the Bank and its staff had to rapidly adapt to do what was asked of it by government, to ensure that the schemes could be launched at pace.
13. The Bank's core role was the launch and operation of the schemes. The Bank also provided advice to government and assistance at the design stage, acted as a conduit between lenders and government, and took on a coordination role during the operation of the schemes, working in partnership with lenders. Entirely new platforms were designed to support the schemes.
14. Existing staff were redeployed to support the schemes, new staff were recruited and outside resource was added to supplement expertise and capacity. Staff worked long and irregular hours. The level of contact with government, both formal and informal, increased significantly. Changes in internal governance, such as various working groups and programme boards, enabled the Bank's Board to support the work of the Bank most effectively under what were significantly challenging circumstances.
15. As time progressed, the Bank also enhanced its capabilities in relation to areas including data, IT infrastructure, outsourcing and risk management, and fraud.

The Bank today

16. Following the changes implemented during the pandemic, the Bank now employs around 600 people. The Bank's capacity, systems and processes are significantly enhanced from those pre-pandemic. The Bank is also implementing a streamlined operating model to deliver agility, quicker decision making, and a clearer proposition for the Bank's delivery partners and individual businesses. This means that the Bank is in a much better position to support the UK government and economy in the event of any future shocks.
17. The post-pandemic position is reflected in the fact that the government has recently placed the Bank at the heart of its growth agenda, enhancing its financial capacity by approximately two-thirds to £25.6 billion to allow it to continue its work in making finance available to UK businesses.

How the Bank usually works

18. An important part of the British Business Bank's role is to understand the changing nature of UK smaller business finance markets, business needs and market gaps, as well as the effectiveness of its own activities. These inform the development of the Bank's products and broader public policy. Having identified a need or a market gap, the Bank conducts further targeted research and develops tailored finance programmes including debt and equity financing, secures government funding, and works closely with a wide range of financial institutions. The research and design stage can last many months. The Bank administers the delivery of initiatives across its Investment and Banking businesses, supporting partners in their implementation and delivery. The Bank continues to assess and monitor outcomes during delivery, typically over a number of years, to ensure accountability and makes amendments to initiatives where required.

How the Bank worked during the pandemic

19. In stark contrast to its work pre-pandemic, the schemes were developed and launched on compressed timelines laden with extraordinary demands on humans and systems. At stake was the need to deliver crucial economic support – without which many were saying the UK economy and smaller businesses would be seriously damaged.
20. The pandemic schemes were designed and approved by the government. This was done with the advice and support of the Bank. The government set or approved the eligibility criteria, size of the intervention, accreditation criteria, the engagement plan and delivery mechanism.
21. The Bank's experience working with lenders across the financial sector and existing EFG scheme meant it became, by necessity, the intermediary between government policy and lender implementation. The participation of lenders was necessary to deliver the schemes. Central government departments did not have the infrastructure, systems, and lender relationships, nor the operational experience and expertise. The Bank was considered to be the most appropriate vehicle available – despite shared concerns about its capacity (a concern which also applied to government). Bank capacity was enhanced with increased funding, and external assistance.

The schemes

CBILS

22. CBILS was announced on 11 March 2020 and launched on 23 March 2020. By 10 March 2020, the Bank and the Treasury ('HMT') agreed to use EFG as the foundation for CBILS. CBILS was launched with little time available for the detailed economic assessments that would ordinarily accompany policy development. Ministers imposed strict time constraints on both design and implementation, with decisions that would normally take months compressed into days or even hours. The Bank was unable to undertake its usual level of analysis and testing due to the need to deliver within those constraints. The Bank was required to consider, advise on, and find solutions to implement, the government's proposed policy decisions at pace and with imperfect data. In doing so, it endeavoured to limit the financial risks posed by then uncharted territories but the reality was that operating in this time frame carried risk that a more considered approach would have substantially mitigated.
23. The Bank set out some of its concerns in writing to the Permanent Secretary for BEIS on 19 March 2020 and requested a formal instruction from BEIS, backed by a Ministerial Direction from the Secretary of State for BEIS. This was provided on 23 March 2020.
24. Lending under CBILS was initially slow, and from early to mid-April 2020 there were public criticisms that funds were not reaching businesses quickly enough. Accordingly, adjustments were made during April to May 2020, and in July and December 2020.

CLBILS

25. CLBILS was designed to support UK companies that were too small to be eligible for support via the Bank of England's Covid Corporate Financing Facility, but too big to apply for a loan under CBILS. CLBILS was announced by the Chancellor on 2 April 2020, the Bank having been informed earlier that day by HMT that a decision was imminent. Various policy decisions around the parameters of CLBILS were made at the instruction of the Chancellor / HMT and BEIS at pace. The scheme was ultimately launched on 20 April 2020, in just over two weeks following announcement.

26. On 12 May 2020, HMT informed the Bank that it had become clear that there needed to be further government support. On 19 May 2020 HMT announced that, from 26 May 2020, CLBILS would be expanded. On 22 May 2020 the Bank sent a letter to the Permanent Secretary for BEIS, noting that it would accept BEIS's instruction without raising formal reservations, but raising several concerns. The Bank was instructed to proceed and changes to CLBILS were implemented from 26 May 2020.

BBLs

27. BBLs was designed as rapidly accessible finance for smaller businesses that were not eligible for loans under CBILS or CLBILS. It was conceived around 18/19 April 2020, announced by the Chancellor on 27 April 2020, and launched on 4 May 2020 – around 16 days from conception.

28. The Chancellor and HMT made key policy decisions to increase the pace at which finance could be made available under the scheme: removing many lender checks, allowing borrowers to self-certify their eligibility, and offering a 100% government guarantee. These decisions can be understood as responding to concerns that CBILS and CLBILS lending had not been fast enough, and that the smaller businesses at whom BBLs was targeted needed urgent assistance.

29. However, these choices created significant risks, and ultimately led to the first reservation notice (the meaning of which is explained below - see paragraph 42). The Bank repeatedly raised these risks through formal and informal channels, and issued a formal letter of concern to the Permanent Secretary for BEIS on 26 April 2020.

30. The Bank highlighted concerns including: the risk of fraud and abuse posed by minimal eligibility checks, potential multiple applications, self-certification, as well as the operational challenge for lenders in delivering another major scheme within the proposed timescales.

31. The Bank also commissioned PWC to prepare advice on fraud risks. Their report, provided to the Permanent Secretary for BEIS on 1 May 2020, identified a “very high” residual fraud risk for BBLs, even among sophisticated lenders. The Permanent Secretary acknowledged the risks, and confirmed that the Chancellor had given the Secretary of State for BEIS his agreement to proceed with BBLs.

32. The Board of the Bank met on 2 May 2020 and agreed to issue a reservation notice. The Permanent Secretary responded on 3 May 2020, issuing a written Ministerial

Direction to the Bank, having been instructed to do so by the BEIS Secretary of State. BBLs launched on 4 May 2020.

33. The risks BBLs posed were identified by the Bank and repeatedly, clearly and firmly brought to the attention of government. It is clear that within BEIS and HMT, not only did this advice reach ministers but the same advice was also being provided by officials within those departments. Ministers had to make a fundamental decision about the trade-off between speed and assurance, and priority was given to speed of lending. Having then been instructed, the Bank focused on delivery and also minimising the risks identified as much as possible while still meeting the policy intentions regarding pace and scale.

Future Fund

34. In late March 2020, the Bank was asked by HMT to propose options for supporting high-growth, venture capital backed companies. This led to Future Fund. The Bank's proposal centred on convertible loans (debt that could convert to equity). On 14 April 2020, the Bank was commissioned by BEIS to develop a convertible loan scheme. The Bank used historic market data, but acknowledged the limitations of such data. The Bank flagged these limitations to HMT and BEIS.
35. Throughout April and May 2020, the Bank raised concerns with BEIS and HMT. This culminated in the Bank issuing a reservation notice shortly before the launch of Future Fund on 18 May 2020, which highlighted concerns including value for money, propriety and conflict with other Bank objectives, also noting the lack of time for testing and delivery support. Again, the BEIS Secretary of State instructed the acting Permanent Secretary to respond with a written direction to proceed.

RLS

36. RLS was launched as a replacement for CBILS, CLBILS and BBLs, which closed on 31 March 2021. By this point, the acute liquidity crisis of 2020 had passed and RLS therefore incorporated more traditional lending criteria.

The role played by the Bank

37. The work required to launch and operate the schemes for all involved cannot be understated. It went far beyond the capacity for which the Bank, as it existed in early 2020, had been designed. In addition to the advice and input that the Bank provided to the government, this included drafting key documentation in relation to each

scheme, liaising with lenders in relation to the drafting of Guarantee Agreements, accrediting lenders at pace, building an Application Programming Interface for the Guarantees Platform, onboarding lenders following accreditation and providing training, organising auditing, operationalising the process through which accredited lenders would receive 'Business Interruption Payments' covering the fee-free period under CBILS and BBLs, and data gathering and monitoring.

38. A significant role which the Bank played on behalf of government was to hold and manage the relationship with lenders. They were radically restructuring lending processes, systems, and risk governance while processing unprecedented volumes of applications under extreme time constraints. The Bank maintained intensive engagement with lenders throughout the design, accreditation, and implementation process. The Bank supported lenders and convened working groups to discuss operational issues and best practice, and provided ongoing guidance. When individual lenders raised concerns or identified risks, the Bank served as the channel through which these concerns were escalated to government.
39. While there were practical challenges at times with the speed of decision making from government, the lack of time for consultation, and the multiple departments with which the Bank liaised; none of the above would have been possible without the strong collaborative working relationships that the Bank had with those in government.
40. This was all achieved during the pandemic itself, with dislocated ways of working and the profound personal impact of this period on the Bank's employees and their counterparts in both government and lenders. In the early months of 2020, staff throughout the Bank worked seven days per week from early morning to late evening, adapting simultaneously to pandemic-related disruptions to their personal and family lives while managing the intellectual and operational demands of unprecedented financial policy implementation.

Advice given to HMG and expressed views

41. The Inquiry will hear evidence that at times the Bank offered advice to government about design features of the schemes and the risks of error and fraud.
42. As explained above, it issued two 'reservation notices' to the government shareholder, which it is required to do if it reasonably believes that carrying out the instruction would require an action that might, for example, infringe the requirements

of propriety or regularity, or not represent good value for money for the Exchequer as a whole. These can be compared to ministerial directions requested by civil servants – e.g. where a decision requires spending outside the norm (examples occurring during the response to the financial crisis, the pandemic, and for the energy price guarantee scheme).

43. As with those, the Bank's reservation notices should not be seen as indicating that there was any rift in the close working relationship it had with government. There was a positive and co-operative relationship between the Bank and government. Rather it exemplifies that the Bank provided its advice in its area of expertise but it did not have the wider picture nor the responsibility which is given to ministers. It was then properly a matter for ministers to take the difficult political decisions which had to be made during the pandemic regarding the right balance to be struck between the speed of lending and the potential checks and balances that could be designed into schemes.
44. The boundary between the role of the Bank and the role of central government and ministers was not always well understood in public commentary at the time, or since. In saying this the Bank is not seeking to avoid responsibility, but rather to draw attention to the reality as recognised by all those involved. It was for the Bank to advise, where appropriate and where it was given an opportunity to do so. It was for government to receive and analyse that advice, and draw on advice from other sources. It was for ministers, the representatives of the elected government, to decide. Once those decisions were made and communicated, it was for the Bank to work with lenders to operationalise them.

Risk, fraud and outcomes

Speed vs assurance

45. The agenda was rightly set by government. That entailed a significant emphasis on speed and short timescales. The risks of the schemes were known, and indeed identified by the Bank, but were accepted in the light of the priority given to speed.
46. During the pandemic, the Bank came under considerable criticism for the time taken to set up the schemes and accredit lenders, and the Bank is cognisant that many who responded to Every Story Matters found the application system confusing and difficult, and the time it took for a scheme to be launched too long.

47. Nevertheless, it is difficult to think that once government had instructed the Bank on each occasion, the schemes could have been produced any faster within their parameters without even greater risk. The times at which schemes were introduced and the trade-off between speed and assurance was in each case a matter for government. The Bank's efforts to reduce fraud as far as possible within the available parameters, alongside the efforts of lenders themselves, are set out in detail in the Bank's evidence.

Safeguarding public money

48. Understandably, much public comment and reporting has centred around fraud, and what the Bank did to prevent fraud. However, the steps that the Bank took to protect public money in operation of the schemes went beyond counter fraud activities. It is important to note that while the Bank had fraud capacity and capability pre-pandemic, this had to expand due to the extent and complexities of the schemes. The Bank also worked closely with the Government Counter Fraud Function.

49. Accreditation was required before lenders could participate in a scheme. This was a criteria-based process which recognised that both the volume of lending required and capability to deliver it at pace needed to be taken into account. After accreditation, the Bank implemented a post-accreditation audit programme. This used scheme data to identify patterns of risk and target audits. Accredited lenders were required to conduct checks, set out under the terms of the schemes, before money was distributed (these checks were reduced for BBLs).

50. When accredited lenders incur losses, they may only claim under the government guarantee if specific conditions are met. The Bank operates pre-claims screening to confirm lenders applied appropriate standards in providing the loans and took recovery action. More significantly, post-claim assurance now uses a risk-based approach to identify potentially fraudulent facilities. Since late 2023, this has operated as a formal programme supported by external consultants to ensure compliance with Guarantee Agreement conditions and strengthen fraud detection across schemes.

51. Guarantees can be removed when lenders, either through their own processes or in discussion with the Bank, identify issues within their portfolio of scheme facilities such as data entry errors or where the lender wishes to voluntarily remove the facility from guarantee cover for other reasons. As at 30 June 2025, the government

guarantee has been removed from 14,328 loans to a total value of £1.14 billion across CBILS, CLBILS and BBLs.⁴

52. Finally, other activities undertaken by the Bank, in conjunction with government, and accredited lenders include: implementing multiple fraud prevention measures, including a Covid scheme fraud risk assessment and Post-Event Action Plan, where appropriate mandatory Cifas duplicate checks, PwC loss-sampling projects, identifying and sharing data on high-risk fraud indicators, a Covid Fraud Hotline with Crime Stoppers, and processes to block dissolution of companies with unpaid loans. The Bank played a role in convening a number of working groups including others, such as regulators and tax bodies, to work collaboratively in identifying fraud. Fraud varied in sophistication, and indicators ranged from, for example, turnover inflation to identity theft.
53. The Future Fund operated differently. Key areas for safeguarding public funds were scheme design, due diligence and portfolio management.

Outcomes

54. The Bank believes that the schemes that eventuated were the best that could be achieved in the time available and the parameters set out. However, they were not perfect and if similar schemes were run again, they would benefit from the knowledge and experience gained during the pandemic.
55. From data to the end of June 2025, CBILS, CLBILS, BBLs delivered £76.85 billion of finance to around 1.63 million businesses. Future Fund delivered £1.14 billion of finance to 1,193 businesses. RLS 1 and 2 delivered £4.33 billion of finance to 20,069 businesses.
- a. 88.01% of CBILS facilities by volume are either fully repaid or on schedule. Lenders have flagged £0.06 billion of the £25.83 billion of CBILS drawn value as suspected fraud. Of the £1.03 billion total settled amount as at 30 June 2025, £0.02 billion has been paid out to lenders against loans with a suspected fraud flag.
 - b. 97.50% of CLBILS facilities by volume are either fully repaid or on schedule. There are no CLBILS loans subject to the guarantee that have been flagged as suspected fraud by lenders.

⁴ Data for CBILS, CLBILS, BBLs (£76.85 billion) from the 'COVID-19 loan guarantee schemes repayment data: June 2025', published 5 September 2025 on gov.uk.

- c. 68.08% of BBLS facilities by volume are either fully repaid or on schedule. Lenders have flagged £1.88 billion of the £46.48 billion of BBLS drawn value as suspected fraud. Of the £11.15 billion total settled amount as at 30 June 2025, £1.57 billion has been paid out to lenders against loans with a suspected fraud flag.⁵

56. In 2021 the Bank commissioned London Economics and Ipsos to undertake a three-year evaluation of the CBILS, CLBILS and BBLS. In 2023, the Bank commissioned London Economics and Ipsos to evaluate the RLS. The Bank also commissioned RSM UK Consulting LLP to undertake a three-year impact evaluation of Future Fund.

57. The Bank has published these reports. The third year evaluation of CBILS, CLBILS and BBLS concludes that “*approximately 100,000 businesses and 1 million jobs were saved*”.

58. While the schemes collectively represented good value for money, the “*fact that the estimated costs of CBILS are so much lower than the corresponding estimates for BBLS highlights the importance of scheme design, and a consideration of the trade-off between the speed of finance provision and robustness of credit checks*”. The report acknowledges that the objective of rapid access to finance was achieved “*due to the design of BBLS and the reduction in the credit checks required*”, and that it was “*unclear how lenders could have realistically handled the volumes of loan applications in a timely fashion without removing many BAU checks*” – as to do otherwise would have risked an extensive backlog and the survival of many businesses.

59. The reports identify important lessons not only for the Bank, but for collaboration between the Bank and government, and for post-scheme enforcement (undertaken by various agencies): improving data sharing to enhance counter fraud efforts; the resourcing of enforcement activities; and developing and implementing a robust counter fraud and enforcement strategy before launching large-scale government programmes.

60. These are reflected on in the Bank’s witness evidence, together with the Bank’s suggestions for potential recommendations: a framework for economic crisis

⁵ Data for CBILS, CLBILS, BBLS from the ‘COVID-19 loan guarantee schemes repayment data: June 2025’, published 5 September 2025 on gov.uk; data for FF from the ‘Future Fund Portfolio’, published on the Bank’s website; and data for RLS from ‘RLS (iterations 1 & 2) Performance Data as at 30 June 2025’, published 26 August 2025 on the Bank’s website.

governance to allow stakeholders such as the Bank to contribute their expertise in real time to government; a full enforcement strategy at the outset of a scheme to enable the government to fully understand the consequences of design decisions; and maintained guarantee scheme infrastructure available for a future crisis.

61. The Bank will continue to reflect on these as the Inquiry hears the evidence in Module 9. Accordingly, the Bank does not intend to go into further detail about these identified lessons in its opening statement. This is because the Inquiry's process of hearing and examining evidence in Module 9 is still ongoing, and the Bank wishes to hear the perspectives of all participants.
62. The reports estimate that CBILS, CLBILS and BBLs resulted in tens of billions of additional Gross Value Added in the UK economy (£15 billion to £36 billion for BBLs, £12 billion to £33 billion for CBILS and £0.4 billion to £8 billion for CLBILS). Without this lending, hundreds of thousands of businesses could have closed between March 2020 and December 2020, accounting for up to 3.5 million jobs.
63. RLS helped many businesses stay afloat: 12% of surviving RLS 1.0 borrowers reported that they "definitely" would have ceased trading and a further 47% said they would have been "very or fairly likely" to have ceased trading without the scheme. Future Fund bridged a crucial financing gap for early-stage, equity-backed firms during Covid-19, boosting investor confidence and preserving the UK's innovation pipeline.
64. The Bank recognises that there is rightly public concern about the level of fraud and error, and the impact on public spending via the government guarantees – this is a concern that the Bank shared, and on which it provided clear and robust advice. However, bearing in mind the level of risk that the Bank originally identified in its reservation notices, the actual level of identified fraud and the overall effectiveness in terms of jobs and livelihoods, the picture is encouraging.
65. Above all, those who run and work for small and medium sized enterprises were often underrepresented in the discourse during the pandemic. The schemes enabled many to continue in an unprecedented situation. Many smaller business owners and managers were under intense financial stress and the emotional toll, described in Every Story Matters, of taking care of staff cannot be underestimated.

Conclusion

66. The Bank has changed significantly since the early days of the pandemic. The experience of delivering the schemes has left the Bank a more robust institution with a far greater capacity to support small and medium sized enterprises.
67. The Bank is now more sophisticated in terms of its assessment of risk with a deeper knowledge of fraud risk assessments and recovery processes, better links with fraud experts across the government and enforcement agencies, is better at using high-quality data to identify facilities where there is a high risk of fraud, and is actively working with the government and lenders to enhance recovery activities.
68. It has active guarantee schemes that are both positive for the UK's economy today and which could provide a scalable basis for future emergency lending. It is clear from the Bank's experiences during the pandemic that cross government collaboration and access to data are key areas to ensure the success of any future emergency schemes.
69. The Bank continues to reflect on the experience of the pandemic, and will listen with care to the evidence of the other witnesses in Module 9.