

THE OPERATION TALLA INDEPENDENT ETHICS COMMITTEE

The Missing Scrutiny of the National Non-Recording Approach

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Executive Summary

During the Covid-19 pandemic, Operation Talla established an Independent Ethics Committee.

Its existence was not incidental.

The National Police Chiefs' Council has explained to the UK Covid-19 Inquiry that the unprecedented nature of Covid policing generated equally unprecedented ethical issues and dilemmas. An independent body was therefore established to provide advice and support to policing and expressly, to enhance public trust and confidence in the governance and actions of the police service.

The Committee was chaired by the Bishop of Manchester, the Right Reverend David Walker. Mike Stamp served as Vice-Chair. Its work was supported administratively by Operation Talla.

Evidence subsequently given by Martin Hewitt, then Chair of the NPCC and Gold Commander for Operation Talla, provides an important additional detail: issues could be submitted to the Committee from Operation Talla's leadership or from individual police forces, with the relevant material being channelled through the staff machinery associated with ACC Owen Weatherill.

The Committee was therefore not simply an abstract advisory body.

There was an identifiable mechanism by which difficult operational questions could be placed before independent members for ethical scrutiny.

There is also documentary evidence demonstrating that the Committee was prepared to scrutinise the boundary between Government policy, legislation, evidence and the proper exercise of police powers.

At its meeting on 5 October 2020, the Committee considered enforcement relating to self-isolation requirements. Its conclusion went beyond general ethical commentary. The Chair summarised the Committee's

position as being that, in order to maintain public trust and ensure the correct legal basis for enforcement, police should not enforce the legislation until the necessary memorandum of understanding and data-sharing arrangements were in place.

That is significant.

The Committee was capable of asking whether police action which might otherwise have been expected was sufficiently grounded in law and evidence to be exercised properly.

The Committee was also capable of being reconvened when circumstances demanded it.

Although its ordinary programme of meetings had concluded by July 2021, an extraordinary meeting was convened at short notice in December 2021, with a substantially larger attendance, specifically to consider the pressing question of possible mandatory vaccination of the Police Service.

Against that background, a presently unanswered question assumes considerable importance.

Subsequent documentary evidence concerning Operation Talla and national policing has identified an approach under which certain Covid/vaccine-related allegations made to police were to be rejected or not recorded.

That approach is materially different from a decision not to enforce a particular statutory provision.

A decision not to enforce asks whether police should exercise coercive powers in particular circumstances.

A decision not to record asks an anterior question:

Whether an allegation presented to police enters ordinary police crime-recording and investigative processes at all.

Despite extensive examination of the publicly searchable material presently available, no evidence has been identified showing that the national rejection/non-recording approach was referred to Operation Talla's Independent Ethics Committee.

That finding must be expressed precisely.

It is not evidence that no referral occurred. It is evidence that no such referral, consideration, minutes, recommendation or decision has yet been identified within the published material examined.

The resulting question is therefore straightforward:

Was the national approach concerning the rejection or non-recording of Covid/vaccine-related criminal allegations ever referred to the Operation Talla Independent Ethics Committee?

If it was, the underlying referral, papers, minutes, advice and resulting decision are plainly material to understanding how that national policing approach was developed.

If it was not, a different and potentially more important question arises:

Why was an operational approach capable of determining whether allegations of criminality entered ordinary policing processes not considered to require the independent ethical scrutiny which Operation Talla had expressly established?

This report examines that question.

1. Operation Talla and the Creation of an Independent Ethical Safeguard

Operation Talla was the national policing response established during the Covid-19 pandemic.

The policing circumstances were exceptional. Legislation was introduced and amended at extraordinary speed. Government guidance and statutory requirements did not always coincide. Police officers were required to make operational decisions in an environment in which law, public-health policy, political announcements and rapidly changing Government expectations interacted continuously.

The NPCC's own submissions to the UK Covid-19 Inquiry explain why an independent ethical structure was considered necessary.

Within weeks of Operation Talla commencing, it had become apparent that the unprecedented policing task was producing unprecedented ethical questions and dilemmas.

Although senior officers could draw upon substantial operational experience within policing itself, it was decided that Operation Talla would benefit from independent advice from individuals possessing a broader range of professional and life experience.

The Independent Ethics Committee resulted.

Its purpose was not merely to comment upon policing retrospectively.

Its Terms of Reference established an advisory mechanism intended to support police forces dealing with ethical issues arising from Covid-19 and thereby enhance public trust and confidence in police governance and police action.

The Committee existed because those directing Operation Talla recognised that extraordinary national policing arrangements required an independent source of challenge.

2. The Committee's Leadership and Structure

The Committee was chaired by the Bishop of Manchester, the Right Reverend David Walker.

Mike Stamp was Vice-Chair.

Martin Hewitt's later evidence records that the Committee's Terms of Reference were issued on 17 June 2020 and that its first meeting occurred on 1 July 2020.

The Committee included independent members from outside the operational command structure.

Its independence was therefore an essential characteristic, rather than merely part of its title.

Hewitt subsequently described the Committee in striking terms.

It acted, in substance, as Operation Talla's *"conscience"*, its *"challenge point"* and its *"critical friend"*.

Those descriptions illuminate its constitutional significance.

Operation Talla had created within its own national structure a body whose function included challenging the assumptions and proposed actions of those exercising operational authority.

3. How Matters Reached the Committee

Martin Hewitt's later evidence provides an important account of the referral process.

Issues could originate within Operation Talla's own leadership.

They could also originate with individual police forces.

Relevant material would then be placed before the Committee through the administrative machinery associated with ACC Owen Weatherill, including his staff officer.

The Committee would consider those issues at its meeting.

There was therefore an identifiable pathway:

Operation Talla leadership / individual police force

to

Operation Talla administrative and staff-officer route
associated with ACC Owen Weatherill

to

Independent Ethics Committee

to

Independent consideration, advice and challenge

That structure is important to the present enquiry.

It demonstrates that operational questions arising nationally or within an individual force had an available route to independent ethical examination.

The relevant question is consequently not whether Operation Talla possessed a mechanism capable of considering a controversial national policing approach.

It plainly did.

The question is whether that mechanism was used.

4. The October 2020 Meeting: What the Committee Could Actually Do

The minutes of the Independent Ethics Committee meeting of 5 October 2020 provide particularly important evidence.

Those minutes identify David Walker as Chair, Mike Stamp as Vice-Chair and Owen Weatherill as attending on behalf of the NPCC and Operation Talla.

The Committee considered, among other matters, the practical and evidential problems associated with enforcement of self-isolation requirements.

The resulting conclusion is revealing.

The Chair summarised the Committee's view that, in order to maintain public trust and ensure the correct legal basis for

enforcement, police should not enforce the legislation until the required memorandum of understanding and data-sharing agreement were in place.

This demonstrates the substantive nature of the Committee's function.

It did not merely discuss broad questions of professional ethics.

It examined whether a proposed exercise of police power possessed the necessary legal and evidential foundation.

And, it was prepared to conclude that police should refrain from enforcement until the necessary safeguards existed.

The UK Covid-19 Inquiry itself considered these minutes sufficiently significant to adduce pages 1 to 3 of the document during Module 7 on 14 May 2025.

The significance of the Committee's role is therefore not a retrospective construction.

The contemporary documentary record demonstrates it.

5. The Crucial Distinction: Non-Enforcement and Non-Recording

The October 2020 decision also exposes an important distinction.

There is a fundamental difference between saying:

Police should not enforce an offence until the necessary legal and evidential conditions for lawful enforcement exist.

and saying:

Police should not record allegations of criminal offending reported to them.

The former restrains the exercise of state power.

The latter potentially prevents an allegation from entering ordinary police processes in the first place.

Those propositions are not equivalent.

A decision against enforcement may protect citizens from the premature or legally unsupported exercise of coercive powers.

A decision against recording potentially affects the creation of the very police record from which assessment, investigation, supervision, evidence-management and subsequent criminal-justice processes may follow. In effect, it creates a “road-block” type of scenario in relation to public access to justice.

That distinction makes the role of the Independent Ethics Committee particularly relevant to the later national non-recording issue.

If the Committee considered the legal and evidential foundation for exercising enforcement powers sufficiently important to require independent ethical examination, there is an obvious question as to whether a national approach affecting the receipt and recording of allegations of criminal offending should likewise have been placed before it.

6. Government, Law and Operational Independence

The importance of independent ethical scrutiny becomes clearer when the evidence concerning Operation Talla's relationship with Government is considered.

Martin Hewitt subsequently described an exceptionally close working relationship between Operation Talla and the Home Office during the pandemic.

His Talla team worked closely alongside Home Office officials while policy was being developed.

He also acknowledged publicly that Government guidance could create operational difficulties.

In his evidence to the Covid-19 Inquiry, Hewitt stated:

"Sometimes government guidance hindered, if I'm perfectly honest."

He described circumstances in which Ministers confused guidance with legislation, contributing to public uncertainty about what the law actually required.

He further described regular engagement with the Home Secretary, the policing minister and senior police leaders.

The underlying constitutional problem was therefore real.

Police officers were responsible for enforcing law.

Government was simultaneously creating policy, issuing guidance and making public announcements concerning expected behaviour.

Those things were capable of diverging.

7. Bishop David Walker's Evidence of "*Ministerial Overreach*"

The significance of this problem was subsequently articulated with unusual clarity by the former Chair of the Ethics Committee himself.

Speaking in the House of Lords on 3 February 2026, David Walker explained why the Operation Talla policing ethics committee had, in large part, been established.

He said police chief constables had been:

"under such pressure from Government Ministers"

and that the police wanted an independent body capable of supporting them:

"in the face of that kind of ministerial overreach."

That evidence is important.

It identifies the Independent Ethics Committee not simply as a source of philosophical advice but as an institutional safeguard at the boundary between political pressure and independent policing.

It also accords materially with Hewitt's evidence concerning the operational difficulties produced when Government announcements, guidance and law failed to align.

Two individuals occupying very different positions within the Operation Talla structure therefore describe substantially the same problem.

Hewitt describes it from the national policing command.

Walker describes it from the independent ethical safeguard established alongside that command.

8. This Was Not Merely a Retrospective Concern

Walker's concerns were not first expressed years after the pandemic.

During Operation Talla itself he spoke publicly about the difficulties created by Government announcements and the regulations which police were expected to enforce.

In October 2021 he expressly referred to his work chairing:

"Operation Talla, the Covid operation ethics committee"

and described that work as addressing:

"the tensions and pressures put on policing during the pandemic"

including advising upon the proportionate implementation of regulations emanating from Government.

There is consequently a coherent contemporary evidential history.

The Committee was established because unprecedented ethical difficulties were anticipated.

It considered the relationship between evidence, law and enforcement.

Its Chair publicly recognised tensions affecting policing and the Committee remained capable of extraordinary reconvening when a sufficiently pressing issue arose.

9. The December 2021 Extraordinary Meeting

The December 2021 meeting is especially important to the present enquiry.

The normal programme of Committee meetings had concluded. Nevertheless, the Committee was reconvened at short notice.

The NPCC's submissions to the Covid-19 Inquiry expressly state:

"an extraordinary meeting took place in December 2021, with a large attendance"

to consider the possible mandatory vaccination of the Police Service.

Hewitt's later evidence independently describes the meeting as having been called at short notice, with a much larger attendance, to address what had become a pressing question.

This establishes an important proposition.

The Ethics Committee remained operationally available when Operation Talla considered an issue sufficiently significant to warrant independent scrutiny.

The Committee was therefore capable of being reactivated beyond its ordinary meeting programme.

Mandatory police vaccination was considered sufficiently important to justify that step.

10. The Present Documentary Gap

The existence of the December 2021 meeting is established.

Its underlying documentary record has not, however, been identified within the material examined for this report.

In particular, the following have not presently been located:

- the complete agenda;
- complete minutes;
- the full attendee list;
- papers submitted to the Committee;
- the request or referral which caused the extraordinary meeting to be convened;
- associated correspondence;
- recommendations made by the Committee; and
- any resulting Operation Talla decision or action.

That is an evidential gap. It must not be converted improperly into an evidential conclusion.

The absence of presently located documents does not establish that those documents do not exist.

It establishes that important records concerning a confirmed extraordinary meeting have not yet been identified within the publicly searchable material examined.

11. The Later National Non-Recording Issue

Separate documentary evidence subsequently identified in the wider examination of Operation Talla raises a different issue.

It concerns the national policing treatment of reports and allegations connected with Covid vaccination and associated matters.

The evidence includes material referring to guidance or an approach under which reports were not to be recorded, together with material concerning the rejection of certain reports presented to police.

The precise provenance, development, authorisation and dissemination of that approach remain matters requiring careful evidential reconstruction.

This report does not proceed upon the assumption that the Independent Ethics Committee approved it. Nor does it proceed upon the assumption that the Committee rejected it.

The problem is more fundamental.

No published evidence has presently been identified demonstrating that the question was put before the Committee at all.

12. Why That Absence Matters

By this stage, three propositions can be established independently.

- First, Operation Talla created an independent mechanism specifically to consider unprecedented ethical problems affecting Covid policing.
- Second, that mechanism was capable of examining concrete operational questions concerning when police should or should not exercise their powers.
- Third, it could be extraordinarily reconvened when a sufficiently pressing issue arose.

Against those established facts, the apparent absence of any published Committee consideration of a national rejection/non-recording approach becomes significant.

The issue potentially affected something elementary to policing:

What happens when a member of the public approaches the police alleging that a criminal offence has occurred?

Whether such a report should be recorded, rejected, treated as intelligence, assessed further or subjected to ordinary investigative processes is not an ethically neutral administrative question.

A national approach capable of altering that process potentially engages public confidence, equality of treatment, police independence, accountability and access to ordinary criminal-justice mechanisms.

Those subjects sit naturally alongside the very considerations which the Independent Ethics Committee existed to examine.

13. The Role of Owen Weatherill

ACC Owen Weatherill occupied a central position within Operation Talla.

The evidence presently available places him within the Committee structure itself.

He attended the documented October 2020 meeting.

More importantly, Hewitt's evidence identifies administrative machinery associated with Weatherill's office as the route through which matters and supporting material could reach the Independent Ethics Committee.

This makes Weatherill a potentially important evidential witness to the Committee's operation.

It does not establish that he personally determined whether every issue was referred. Nor should such a conclusion be inferred without evidence.

It does, however, make several factual matters capable of direct clarification.

Those include how issues were selected for referral, who submitted them, how the Committee's records were maintained, where its conclusions were sent and whether the later national non-recording issue ever entered that process.

14. The Position of Pete Healey

The documentary record also identifies an important administrative dimension.

The published October 2020 minutes identify their author as NPCC/NPoCC - PH.

Separate Operation Talla material has associated Inspector Pete Healey with the establishment and management of the Ethics Committee.

Read alongside Hewitt's evidence that Operation Talla staff provided administrative and secretarial support, this makes the documentary route itself capable of further investigation.

The important questions are practical rather than speculative:

- Who maintained the Committee's records?
- Where are those records now held?
- Who determined its agendas?
- Who retained referrals and supporting papers?
- Who received its recommendations?
- And where is the complete documentary record of the December 2021 extraordinary meeting?

15. The Central Evidential Question

The investigation has therefore reached a narrow and answerable question:

Was the national policing approach concerning the rejection or non-recording of Covid/vaccine-related allegations ever referred to the Operation Talla Independent Ethics Committee?

There are only two broad possibilities.

If the answer is yes

The evidential record should be capable of identifying, subject to any lawful restriction:

- the referral;
- the originating person or organisation;
- the question submitted;
- the supporting material;
- the date of consideration;
- those attending;
- the Committee's discussion;
- its advice or recommendation;
- and the resulting Operation Talla decision.

Those materials would be important evidence concerning the provenance and governance of the national approach.

If the answer is no

A further question necessarily arises:

- Why was independent ethical scrutiny not sought?

That question becomes particularly significant given the Committee's established willingness to consider operational questions concerning the lawful exercise of police powers and its extraordinary reconvening in December 2021 to consider mandatory vaccination within policing itself.

16. What the Evidence Does Not Establish

Precision is essential.

The evidence considered in this report does not presently establish that Government instructed Operation Talla to reject or not record Covid/vaccine-related criminal allegations.

It does not establish that David Walker or the Independent Ethics Committee knew of such an approach.

It does not establish that Owen Weatherill personally decided whether the matter should or should not be referred to the Committee.

It does not establish that the Committee approved the approach.

And the failure presently to locate Committee records dealing with the subject does not prove that no such records exist.

Those would all go beyond the available evidence.

What the evidence does establish is that an independent ethical mechanism existed; that there was an established route by which operational matters could reach it; that the Committee considered substantive questions about the legal and evidential foundation of police action; that it could be reconvened extraordinarily; and that no publicly

searchable evidence has yet been identified demonstrating its consideration of the later national rejection/non-recording issue.

That distinction is fundamental to this report.

17. A Constitutional Question, Not Merely an Historical One

The importance of the issue extends beyond reconstruction of pandemic policing.

Operational independence is one of the defining characteristics of policing by consent.

- Government creates legislation and determines policy.
- Police officers exercise powers conferred by law.

The two necessarily interact, but they are not the same function.

The evidence from both Hewitt and Walker demonstrates that Operation Talla operated in circumstances where the distinction could become strained.

Government announcements could move faster than legislation.

Guidance could be mistaken for law.

Ministers were under political pressure to act.

Chief constables were simultaneously responsible for ensuring that officers acted lawfully and proportionately.

Operation Talla's Independent Ethics Committee existed, at least in substantial part, because that boundary required protection.

That makes the provenance of any national approach affecting whether allegations of criminal conduct were recorded by police a legitimate matter of public interest.

18. The Evidential Sequence

The presently established sequence can be stated simply.

June 2020

Operation Talla establishes an Independent Ethics Committee because unprecedented policing circumstances are producing unprecedented ethical dilemmas.

July 2020

The Committee begins meeting under the chairmanship of David Walker.

October 2020

The Committee examines the legal and evidential basis for police enforcement and concludes that enforcement should not proceed until necessary safeguards are established.

During 2020 - 2021

Operation Talla operates in exceptionally close contact with Government while navigating recurring difficulties concerning the relationship between Government guidance, ministerial announcements and the law.

October 2021

Walker publicly describes his Committee as addressing the "*tensions and pressures*" placed upon policing during the pandemic.

December 2021

The Committee is extraordinarily reconvened at short notice, with a large attendance, to consider possible mandatory vaccination of the Police Service.

Thereafter

Evidence emerges concerning a national policing approach involving rejection or non-recording of certain Covid/vaccine-related allegations.

Present position

No published evidence has yet been identified demonstrating whether that approach was ever referred to the Independent Ethics Committee.

That final evidential gap is the subject of this report.

19. Matters Requiring Clarification

The evidence now justifies clarification of the following matters:

- Whether the national rejection/non-recording approach was ever referred to the Independent Ethics Committee.
- If so, when and by whom.
- What precise question was submitted.
- What documents or evidence accompanied the referral.
- Which Committee members considered it.
- What advice, recommendations or concerns were expressed.
- What action Operation Talla took following that consideration.
- If the matter was not referred, who determined that independent ethical consideration was unnecessary.
- What criteria governed the selection of matters for referral to the Committee.
- Whether the December 2021 extraordinary meeting considered any issue extending beyond mandatory vaccination of police personnel.
- Where the complete records of that extraordinary meeting are presently held.

- Where the complete archive of the Operation Talla Independent Ethics Committee is held.

These are questions of documentary fact.

They do not require speculation about motive.

20. Summary Conclusion

Operation Talla anticipated that pandemic policing would produce extraordinary ethical difficulties. It therefore established an Independent Ethics Committee.

That Committee was not ceremonial. It was capable of challenging proposed police action.

- It considered whether enforcement possessed the necessary legal and evidential foundation.
- It existed to provide independent advice and enhance public confidence.
- Its Chair later explained that chief constables needed independent support against ministerial pressure and what he described as "*ministerial overreach*."
- And when an important new question arose in December 2021 concerning mandatory vaccination of police officers, the Committee could be reconvened extraordinarily to consider it.

Against that institutional history, the unanswered question concerning the later national rejection/non-recording approach is unavoidable.

Was it independently scrutinised?

The presently available published record does not answer that question.

That absence should neither be exaggerated nor ignored.

It should be resolved.

If the matter went before the Independent Ethics Committee, the documentary record of that consideration would materially assist public understanding of how the national approach was reached.

If it did not, the reason why an issue of such potential significance to police recording, investigation, accountability, public confidence and access to justice was not referred requires explanation.

The issue can therefore be reduced to one proposition:

Operation Talla created an independent mechanism specifically to scrutinise difficult ethical questions arising from national Covid policing.

The outstanding question is whether that mechanism was used when policing determined how Covid/vaccine-

related allegations of criminal offending were to be received and recorded.

Until the documentary record answers that question, an important part of the governance history of Operation Talla remains incomplete.

Evidential Note

This report distinguishes deliberately between established evidence, reasonable evidential questions and matters which remain unproved.

The absence of a document from publicly searchable material is not treated as proof that the document does not exist.

Similarly, no conclusion is reached as to Government involvement in the provenance of the national non-recording approach without primary evidence establishing such involvement.

The purpose of the report is narrower: It is to identify the documented purpose, capability and referral machinery of the Operation Talla Independent Ethics Committee and to identify the presently unresolved question of whether the national rejection/non-recording approach was subjected to that independent mechanism.

That question is capable of being answered by those who operated Operation Talla and by the surviving documentary record.

Principal Source Record

UK Covid-19 Inquiry - INQ000651552

Witness Statement of Martin Hewitt on behalf of the National Police Chiefs' Council, dated 14 July 2025.

UK Covid-19 Inquiry - INQ000099806

Operation Talla Independent Ethics Committee, minutes of meeting dated 5 October 2020. Pages 1 to 3 were adduced by the Inquiry in Module 7 on 14 May 2025.

National Police Chiefs' Council - Module 2 Opening Submissions

Evidence concerning the establishment, purpose and operation of the Independent Ethics Committee, including confirmation of the extraordinary December 2021 meeting concerning possible mandatory vaccination of the Police Service.

UK Covid-19 Inquiry - Module 7 oral evidence of Martin Hewitt

Evidence concerning the Independent Ethics Committee, enforcement, the relationship between policing and Government, and difficulties arising from the distinction between Government guidance and law.

House of Lords - 20 October 2021

Contemporary statement by David Walker concerning his chairmanship of the Operation Talla Covid ethics committee and the tensions and pressures affecting policing during the pandemic.

House of Lords - 3 February 2026

Statement by David Walker concerning the establishment of the Operation Talla policing ethics committee, ministerial pressure upon chief constables and the need for independent support in the face of "*ministerial overreach*."