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# Policing the Pandemic in England and Wales: Police use of Fixed Penalty Notices from 27 March 2020 to 31 May 2021

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**Policing the pandemic in England and Wales:  
Police use of Fixed Penalty Notices from 27 March 2020 to 31 May 2021**

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Any views expressed in this report are those of the authors alone and do not necessarily reflect the opinions and beliefs of the NPCC or other policing organisations.

## Foreword

With new legislation being implemented at pace, and vaccination not available until early 2021 in meaningful quantities, policing's focus was to encourage the public to follow the regulations to save life and safeguard the vulnerable, where reasonably possible.

The policing approach nationally throughout the pandemic was therefore framed through the 4Es principle of engaging with individuals to explain the regulations and encourage compliance. If that was unsuccessful, only then would enforcement action take place.

During the early stages of the pandemic however, there were indications of disproportionality in the fines given across England and Wales and the NPCC decided to commission independent detailed analysis to understand the issue in more detail.

The first few months of the pandemic were exceptionally fast moving, with many iterations of regulations being issued. Accordingly, the data related to the fines issued, spans a range of regulations, and every police force in England and Wales.

As the restrictions changed in relation to travel, movement, and gatherings, the initial analysis enabled us to understand patterns of failure to follow regulations. Specifically, the analysis gave us greater insight into who was receiving fines, where and why they were issued, and how patterns of usage varied.

It is vital for the police to be open, transparent and share the data we have and have that independently analysed to find areas in which we can improve. We know that over time, frustration grew amongst the public and attitudes changed towards following the rules. It was important to capture this potential change in public attitude within the data analysis.

This further report therefore builds on the first report and examines how policing of the pandemic changed over time, with three time-periods analysed based on patterns of enforcement during the pandemic and related policy and legislative change.

Professor Susan McVie, Dr Kath Murray and Dr Victoria Gorton from the University of Edinburgh, alongside Dr Ben Matthews from the University of Stirling have great experience in this field. Having already analysed pandemic enforcement data for Police Scotland, they were a natural fit to undertake this further analysis for the NPCC.

The report produced by them provides the independent view of the data required, and enables the communities that policing serves to better understand and scrutinise the data and ask questions of their local police force.

**Assistant Chief Constable Owen Weatherill**

**National Police Chiefs' Council**

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## Abbreviations and definitions used in the report

ACRO	ACRO Criminal Records Office
APS	Annual Population Survey
FPN	Fixed Penalty Notice
IMD	Index of Multiple Deprivation
LSOA	Lower Layer Super Output Area
NPCC	National Police Chiefs Council
ONS	Office for National Statistics
PFA	Police Force Area
WIMD	Welsh Index of Multiple Deprivation

## Executive Summary

On 26 March 2020, the UK and devolved Governments introduced new Regulations in response to the serious imminent threat to public health posed by the Coronavirus pandemic. The Regulations provided the police with temporary powers to take action to enforce various restrictions, including the ability to issue Fixed Penalty Notices (FPNs) to those who breached the new Regulations.

This report examines data on FPNs issued in England and Wales between 27 March 2020 and 31 May 2021 in relation to illegal travel and movement, social gatherings, and failure to follow instructions. The report focuses on who received fines, where and why they were issued, and how patterns of usage varied over time as the restrictions changed. The report excludes data on FPNs issued in relation to businesses, organising large gatherings, international travel, and face-coverings.

To examine how policing changed over time, three time-periods were analysed based on patterns of enforcement during the pandemic and related policy and legislative change. Period one runs from 27 March to 3 July 2020, in which the level of enforcement was moderate. Period two runs from 4 July to 31 December 2020, during which the level of enforcement was low. Period three runs from 1 January to 31 May 2021, during which the level of enforcement was at its highest.

Analysis of data for England and Wales are presented together; however, it is important to note that there were key differences in the nature and timing of the Regulations that may have impacted differentially on police use of enforcement. Periods of restriction lasted longer in Wales than in England, while fine amounts were larger in England than in Wales. Observed differences in enforcement between the two countries may, therefore, reflect these and other factors.

Overall, the analysis in this report provides valuable insights into the profile and patterning of police enforcement during one of the most tumultuous periods in recent history. Policing and enforcement played a major role in the respective UK governments' response to the pandemic; however, it is difficult to assess the long-term impact and effectiveness of enforcement on public compliance. Patterns of policing response during the pandemic are likely to reflect a number of factors, including differences in non-compliance between groups, local policing demands and approaches, public reporting habits, and/or the nature, timing, and locality of restrictions. Regulatory differences and public confusion around these may well explain some of the variation in enforcement levels between England and Wales. Lower fine values may also have contributed to higher rates of enforcement in Wales, compared to England; and almost certainly resulted in higher payment of fines in Wales across all groups. Further research would be needed to explore these areas of complexity.

## Key findings

- Between 27 March 2020 and 31 May 2021 police officers in England and Wales issued 122,506 FPNs (110,502 in England and 12,004 in Wales) in relation to breaches of restrictions on movement, attending gatherings, and failure to comply with instructions.
- Around two thirds of all FPNs in both England and Wales were issued between January and May 2021.
- The rate of FPNs issued per 10,000 adults in Wales was 1.9 times higher than in England; however, the difference between the two countries declined over time.
- A far higher proportion of FPNs in England were issued in relation to attending illegal gatherings than travel/movement; whereas, around the same proportion were issued for attending gatherings and travel/movement in Wales.
- Less than one in twenty FPNs issued in England and Wales were recorded as being due to failure to comply with instructions or obstructing someone in their duty in respect of upholding the Regulations.

## Demographic profile of FPN recipients

### Sex

- Males were significantly more likely to be issued with FPNs than females in both England and Wales. The proportion of FPN recipients who were male was slightly, but significantly, higher in England (70.6%) than Wales (66.1%).
- Based on population size, the rate of FPNs issued to men was 2.4 times higher than that for women. This figure was higher in England (2.5) than in Wales (2.0).
- The ratio of FPNs issued to men compared to women was highest during period one in both England (4.5) and Wales (3.4). Over time, the male to female sex ratio increased over time in England but narrowed in Wales.

### Age

- Almost half of those who received FPNs were aged between 18 and 24, more than four times higher than their population share in both England and Wales.
- Just over one in 10 FPNs were issued to people aged 45 or over, who make up more than half of the population in both countries.
- In Wales, the rate of FPNs issued per 10,000 people aged 18 to 24 was almost double that for England, at 191.7 and 106.6 respectively.

- The proportion of all FPN recipients, in both England and Wales, who were aged 18 to 24 rose from around a third in period one, to around a half in periods two and three.

### Ethnicity

- The majority of individuals issued with FPNs for breaching the Regulations in England and Wales came from a white background (including white minorities), with one in five being issued to individuals from an ethnic minority background (excluding white minorities).
- Over a quarter (27.0%) of FPN recipients in England were from an ethnic minority background, which was around double their population share (13.7%). The equivalent figure for Wales was one in ten (10.7%), which was also double their population share (5.2%).<sup>1</sup>
- In England, the rate of FPNs per 10,000 people from an ethnic minority background was 46.1, compared to 19.9 for white individuals, reflecting an ethnic disparity rate of 2.3. The equivalent figures for Wales were 119.0 and 42.7, respectively, reflecting a higher ethnic disparity rate of 2.8.
- The ethnic disparity rate in England was highest for people from a black ethnic background, who were 3.2 times more likely to be issued with an FPN than those from a white background. The equivalent figure for Wales was 2.9.
- The ethnic disparity rate in Wales was highest for people from mixed or Asian ethnic backgrounds who were 3.5 and 3.1 times, respectively, more likely to be issued with an FPN than those from a white background. The equivalent figures for England were 2.8 and 2.1.
- Ethnic disparities in the use of FPNs were highest in Wales during period one but declined over time; while ethnic disparities in England increased between periods one and three.
- Males had a higher ethnic disparity rate than females across all three time periods in England and Wales.
- Overall, the ethnic disparity rate was highest among FPN recipients aged 45 years or over, at 2.8 in England and 3.5 in Wales; although, differences between age groups were more notable during periods two and three than in period one.

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<sup>1</sup> Particular caution should be exercised when interpreting rates in respect of Wales, where the total number of FPNs issued to people from an ethnic minority background over the 14-month period (n=1,255) was very small in absolute terms.

## Area deprivation

- FPN recipients were disproportionately likely to be living in LSOAs<sup>2</sup> that were ranked amongst the most deprived in England and Wales.
- In England, FPN recipients were 7.2 times more likely to be living in one of the 10% most deprived LSOAs than one of the 10% least deprived LSOAs during period one. This reduced to 3.9 in period two, before increasing again to 4.7 in period three. The equivalent figures were lower for Wales, at 4.3, 2.0 and 3.2, respectively.
- The reduction in the disparity between those living in the most and the least deprived areas of England and Wales suggests that there was a widening in the social spectrum of the population that the police were dealing with around compliance over time.
- Data was not available on the socio-economic background of the individuals who received fixed penalties.

## Police Force Area (PFA)

- The number of FPNs issued, and the rate per 10,000 resident population, varied widely across PFAs. There were also marked differences between the forces in England and Wales.
- The average rate of FPNs issued across English PFAs was 20.0 per 10,000 resident population. Rates were lowest in Humberside (7.1) and West Midlands (7.8); and highest in Northumbria (45.2), Merseyside (47.9) and North Yorkshire (49.4), all of which were more than double the English average.
- Amongst Welsh PFAs, the average rate per 10,000 resident population was almost twice that of the English average, at 38.6. Rates were lowest in Gwent (21.4), which was still above the average for England, and highest in North Wales (45.2).
- It is possible that longer periods of restriction in Wales and confusion about differences in rules between countries contributed to a greater degree of illegal travel within and into Wales, which may help to explain the higher rate of enforcement compared to England.
- The rate of issue at PFA level varied over time. Of the ten PFAs with the highest FPN rates per 10,000 resident population in period one, only four remained in the top ten by period three (North Yorkshire, North Wales, Lancashire, and Northamptonshire).

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<sup>2</sup> Lower Layer Super Output Areas (LSOAs): LSOAs are small geographies with an average population of 1,500 people or 650 households.

- The highest-ranking police forces during period one included several rural forces containing areas of outstanding natural beauty and national parks; however, by period three, there was an increase in forces covering large urban centres.
- People who were not living in the PFA in which they were fined ('non-residents') accounted for 22.0% of all FPNs. This was significantly more common in Wales (30.5%) than in England (21.1%).
- In Wales, three quarters of FPNs issued to non-residents of PFAs involved people who had travelled from England, whereas only 1% of fines issued to non-residents of English PFAs had travelled from Wales.
- Enforcement in relation to illegal travel and movement by non-residents within Welsh PFAs helps to account for the higher overall rate of FPN issue per capita in Wales compared to England.
- Across all PFAs, the rate of FPNs issued per 10,000 resident population was higher for those from ethnic minority backgrounds than for white people. The ethnic disparity rate ranged from 1.4 in Warwickshire to 8.4 in Cumbria.
- In many PFAs, the ethnic disparity rate reduced when non-residents were excluded. This was especially the case in Cumbria, North Wales and Dyfed-Powys, which had some of the highest ethnic disparity rates.
- The lower ethnic disparity rates based on residents only suggests that, within some PFAs, enforcement amongst those who were not normally resident in that area may have disproportionately involved people from ethnic minority backgrounds.
- Caution should be exercised when interpreting ethnic disparity rates as there is the unknown degree of error in the population data for ethnic groups.

### Repeat FPN recipients

- There were 116,107 individual FPN recipients in England and Wales, of which 5,111 (4.4%) were fined on more than one occasion.<sup>3</sup> Under the Coronavirus Regulations, the value of fines doubled for each subsequent FPN.
- The vast majority (83.7%) of repeat FPN recipients received two fines, over one in ten (11.2%) were fined three times, and one in twenty (5.0%) were fined on four or more occasions.
- Repeat FPN recipients in England were 1.7 times more likely than single recipients to be living in one of the top 10% deprived LSOAs. In Wales, the difference was narrower at 1.3, but still statistically significant.

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<sup>3</sup> The maximum FPN value varied between countries and over time.

## Cancellation of FPNs

- Review processes were in place which led to 6,423 FPNs issued in England and Wales being either cancelled by the issuing police force or withdrawn by ACRO. This represented 5.2% of all fines issued.
- A higher proportion of FPNs were cancelled in England (5.5%) than in Wales (3.0%), but there was considerable variation across PFAs.
- In England, the percentage of FPNs cancelled was lowest in Warwickshire (1.1%) and highest in the West Midlands (23.5%). In Wales, cancellation was less common than English PFAs on average, ranging from 1.5% in Gwent, to 5.2% in Dyfed-Powys.
- A fifth of all FPNs issued to individuals who were not resident within the issuing PFA were cancelled, compared to only 1.4% of FPNs issued to residents.
- Cancellation of FPNs reduced over time, suggesting that police officer practice was increasingly in line with the legislation and policing policy as time went on. The proportion of cancelled FPNs remained consistently higher in England than Wales, however.
- FPN recipients aged 18-24 were least likely to have their tickets cancelled (4.6%), while those aged between 35 and 44 years (5.5%) were most likely. Prevalence of cancellation did not vary by sex.
- FPNs issued to people from an ethnic minority background were more likely to be cancelled (5.9%) than those for white recipients (4.8%), with people from a black ethnic background being most likely to have a fine cancelled (7.3%).
- FPN recipients in England who were living in the most deprived areas were most likely to have their FPN cancelled, while those living in least deprived deciles were least likely. Area deprivation differences were not significant for FPN recipients in Wales.
- Repeat FPN recipients were significantly more likely to have an FPN cancelled than those who received only one.

## Payment of FPNs

- More than half of FPNs were paid within the statutory payment period, but payment levels were consistently higher in Wales than England.
- Payment varied from only 30.5% of all FPNs issued in Cleveland to 70.6% of FPNs issued in Warwickshire; however, there was no clear relationship between payment rate and rate of issue within PFAs.

- In most PFAs, FPNs issued to non-residents were more likely to be paid; however, some areas had no significant difference, and a few had higher payment rates amongst residents.
- Payment of FPNs was highest in England and Wales during period two (July to December 2020), when the rate of issue was at its lowest overall.
- Female FPN recipients were more likely to pay than males, and those in the oldest age group were most likely to pay overall; although, 18-24 year olds were more likely to pay than some other age groups.
- In Wales, FPN recipients from any ethnic minority background were more likely to pay than those from white backgrounds; although, there was no difference between white and ethnic minority recipients in England. There were, however, considerable differences in payment between ethnic minority groups.
- There was a clear payment gradient by area deprivation, with those living in the most deprived areas of England and Wales being least likely to pay and those living in the least deprived areas being most likely to pay.
- Those who received more than one FPN were substantially less likely to pay at least one of their fines compared to single recipients, especially in England.
- Likelihood of payment varied by reason for issue of the FPN, but it was higher for movement or travel and attending gatherings than general failure to comply.
- Payment levels were consistently higher in Wales than England across time and between groups, which suggests a systematic difference between countries. The most likely explanation for higher payment levels in Wales is the much lower value of FPNs than those issued in England.



# 1. Introduction

## 1.1. Purpose of the report

This report provides detailed analysis of Fixed Penalty Notices (FPNs) issued under the Coronavirus Regulations in England and Wales between 27 March 2020 and 31 May 2021. The report was commissioned by the National Police Chiefs' Council (NPCC) to provide an overview of police use of enforcement in respect of the Regulations.

The report offers a comprehensive picture of: the number and rate of FPNs issued in England and Wales; the reasons for which FPNs were issued; the demographic profile of those who received FPNs (including age, sex, ethnicity, and area deprivation); the number and rate of FPNs issued across different police force areas; and the profile of repeat FPN recipients. The report also looks at the outcomes of FPNs, in terms of cancelled or withdrawn fines, and patterns of payment. Building on an earlier report published by the NPCC,<sup>4</sup> the analysis also tracks changes in the use of enforcement over three distinct periods of the pandemic.

## 1.2. The Coronavirus Regulations

On 26 March 2020, under public health protection powers contained in the Public Health (Control of Disease) Act 1984, the UK and Welsh Governments, respectively, introduced the Health Protection (Coronavirus, Restrictions) (England) Regulations 2020<sup>5</sup> and Health Protection (Coronavirus Restrictions) (Wales) Regulations 2020<sup>6</sup> ('the Regulations') in response to the serious imminent threat to public health posed by the Coronavirus pandemic.

In both countries (as well as Scotland and Northern Ireland) the Regulations set out similar restrictions relating to movement (for example, prohibiting people from leaving home without a 'reasonable excuse', and travelling outside their local area), attending gatherings (for example, limiting the number of people who could socialise together, particularly in high-risk indoor settings), and business/hospitality (requiring certain businesses to close or operate under restrictions). Subsequent laws also introduced requirements relating to face-coverings, self-isolation, local lockdowns, organising large gatherings, and international travel.

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<sup>4</sup> Currenti, R. and Flatley, J. (2020) [Policing the Pandemic](#) NPCC.

<sup>5</sup> See: [The Health Protection \(Coronavirus, Restrictions\) \(England\) Regulations 2020](#)

<sup>6</sup> See: [The Health Protection \(Coronavirus Restrictions\) \(Wales\) Regulations 2020](#)

### 1.3. Fixed Penalty Notices

The Regulations introduced temporary powers of enforcement for the police, to help reduce the spread of the Coronavirus. Police officers were given the power to issue Fixed Penalty Notices (FPNs) to, or in extreme cases to arrest, those found to be non-compliant with the restrictions.<sup>7</sup> An FPN is an enforcement tool, commonly used for motoring offences and a range of low-level offences, which allows a person to pay a penalty instead of being prosecuted. Paying the penalty amount is not an admission of guilt, and payment does not result in a criminal record.

#### Variation in FPN payment structures

Initially, there were fairly minor differences between the four UK countries in terms of the legislation relating to FPNs, as shown in Table 1. The age limit for FPNs was set at 18 or over, except in Scotland where a lower age limit of 16 was set (although this was increased to 18 in May 2020 after concerns were raised by children’s rights organisations).<sup>8</sup> In all four countries a first FPN incurred a penalty of £60, which was reduced to £30 if paid within either 14 days (England, Wales, Northern Ireland) or 28 days (Scotland). Unusually, the Regulations also introduced an incremental fining structure, whereby the value of the fine doubled for each subsequent offence. To begin with a maximum of five FPNs were permitted, up to a value of £960, except in Wales where the maximum was set at £120.

**Table 1. The Health Protection (Coronavirus) (Restrictions) Regulations 2020: fine values in original legislation for England, Wales, Scotland, Northern Ireland (26 March 2020)**

Country	Legislation	First penalty	Further penalties	Minimum age
England	<a href="#">Regulation 10</a>	£60 reduced to £30 if paid in 14 days	Doubling each time to a £960 maximum	18
Wales	<a href="#">Regulation 13</a>	£60 reduced to £30 if paid in 14 days	£120 maximum	18
Scotland	<a href="#">Regulation 9</a>	£60 reduced to £30 if paid in 28 days	Doubling each time to a £960 maximum	16
Northern Ireland	<a href="#">Regulation 9</a>	£60 reduced to £30 if paid in 14 days	Doubling each time to a £960 maximum	18

Over time, the value of FPNs that could be issued diverged between the four countries. In May 2020, the minimum fine value in England increased from £60 to £100 (reducing to £50 if paid within 14 days) and the upper limit for fines increased from £960 to £3,200.<sup>9</sup> In September 2020, the minimum fine value in England increased again, to £200, (reducing to £100 if paid within 14 days) and the maximum

<sup>7</sup> FPNs could also be issued by Police Community Safety Officers in England and Wales.

<sup>8</sup> See [Independent Children’s Rights Impact Assessment on the Response to Covid-19 in Scotland](#)

<sup>9</sup> See: NPCC (29 May 2020) [Statistical update on number of lockdown fines given by police](#)

value increased to £6,400.<sup>10</sup> In Wales, the value of a first fine remained at £60 throughout the pandemic; however, in May 2020, the maximum fine value increased from £120 to £1,960, in response to evidence from the four police forces in Wales and the Police and Crime Commissioners.<sup>11</sup> Whereas, in Scotland, the maximum fine value was reduced to £480 under guidance from the Lord Advocate.<sup>12</sup>

Overall, therefore, the fine amounts were much larger in England than Wales for the majority of the pandemic. It is not known whether the different fine values and structures impacted on public behaviour, or on the approach of police forces in different parts of the UK.

#### 1.4. The ‘4Es’ approach

In March 2020, the National Police Chief’s Council (NPCC) and College of Policing issued joint strategic guidance on the implementation of the Regulations, setting out a ‘4Es’ approach.<sup>13</sup> This advised police officers to first ‘Engage’ with people in conversation, then ‘Explain’ the importance of following the Regulations in relation to the spread of the Coronavirus before ‘Encouraging’ those who were not adhering to the legislation to do so. Only where the first 3Es were unsuccessful should officers move to ‘Enforcement’ by issuing a Fixed Penalty Notices (FPN) or, in extreme cases, make an arrest.

The UK and devolved governments subsequently made hundreds of laws in response to the pandemic. A report published by Her Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) in April 2021 found that this rapidly changing legislative landscape impacted on the policing response and that, although all forces had adopted the 4Es approach, officers ‘weren’t always clear about what applied in their local areas’ and ‘found it difficult to explain, engage and encourage when faced with the large number of changes’.<sup>14</sup>

Throughout the pandemic individual police forces remained responsible for operational decisions about how the powers should be used locally, with officers having significant discretion about whether a person breaching the restrictions should be given advice, warned, or issued with an FPN. Within individual police

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<sup>10</sup> Crown Prosecution Service (updated 2022) [Coronavirus: Health Protection \(Coronavirus, Restrictions\) \(No.2\) \(England\) Regulations 2020](#). See ‘Amendments to Regulation 9 from 24 September 2020’.

<sup>11</sup> Welsh Government (20 May 2020) [Fines increased for repeat coronavirus lockdown breaches in Wales](#)

<sup>12</sup> See: McVie (2022) [Payment Outcomes of Police Fixed Penalty Notices registered by the Scottish Courts and Tribunal Service during the Coronavirus Pandemic](#).

<sup>13</sup> Police Federation (26 March 2020) [Guidance issued on new police powers](#)

<sup>14</sup> HMICFRS (2021) [Policing in the pandemic – The police response to the coronavirus pandemic during 2020](#) (p. 37)

forces, senior officers conducted monitoring of FPNs, and some fines were later cancelled, as discussed in part seven.

## 1.5. Disproportionality in the use of FPNs

A review of the use of FPNs by the UK Parliament Joint Committee on Human Rights<sup>15</sup> concluded that some groups within the population seemed more likely to be fined than others, but not enough was known about why this was the case. The Committee report stated that the Government must commission research and analysis ‘on the reasons behind such variable rates of enforcement amongst different groups’ (2021: 33). Highlighting concerns about wrongly issued FPNs, an inadequate review and appeal process, and concerns about the size of the penalties issued in some circumstances, the Committee called for a comprehensive review of all FPNs issued and stated that consideration should be given to removing any convictions received under the Coronavirus Regulations from criminal records.

An earlier report published by the NPCC<sup>16</sup>, which reviewed police use of FPNs from 27 March to 25 May 2020, found a complex picture, with considerable variation in the rate of FPNs issued between Police Forces. This was partially explained by differences in the use of fines for people who had travelled between Police Force Areas. The report also found ethnic disproportionality, with those from ethnic minority groups issued with FPNs at a rate 1.6 times higher than for white ethnicities. Young people, and particularly young males, were also found to be over-represented amongst those who received FPNs, and this was the case for all ethnic groups.

In Scotland, similar research over the same period using Police Scotland data found that FPNs were significantly more likely to be issued to younger people (particularly males), those living in more deprived areas, and people with a prior criminal history.<sup>17</sup> Disproportionality in the use of FPNs (by age, sex, ethnicity and area deprivation) over the course of the pandemic is considered in this report; however, it is important to note that disproportionality does not necessarily infer unfair or discriminatory policing practices. To ascertain this, much more information would be needed about the behaviour of the population during the pandemic, how this changed over time and differences between groups in terms of regulatory breaches.

## 1.6. Periods covered by the report

Trends in police enforcement changed significantly between March 2020 and May 2021. To examine these changes, some of the analysis has been broken down into

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<sup>15</sup> House of Commons and House of Lords Joint Committee on Human Rights (2021) [The Government response to covid-19: fixed penalty notices](#)

<sup>16</sup> Currenti, R. and Flatley, J. (2020) [Policing the Pandemic](#) NPCC.

<sup>17</sup> McVie, S. (2021) [Second data report on Police Use of Fixed Penalty Notices under the Coronavirus Regulations in Scotland](#)

three distinct time-periods, which are based on changing patterns of police enforcement and related policy and legislative changes. The three periods are summarised below and described in more detail in Annex 1, which sets out the key legislative and policy changes that occurred in England and Wales.

**Period 1:** The first period runs from 27 March to 3 July 2020. This covers the first national lockdown and the period during which restrictions were eased in England and Wales. In relative terms, levels of enforcement during this period can be characterised as ‘moderate’.

**Period 2:** The second period runs from 4 July 2020 to 31 December 2020. This covers the period of summer easing, which ran from July to August, followed by the increased use of restrictions from September onwards. It includes the firebreak period in Wales and second national lockdown in England. Relatively speaking, levels of police enforcement during this period can be characterised as ‘low’.

**Period 3:** The third period runs from 1 January to 31 May 2021. This includes the second national lockdown for Wales, and the third lockdown for England, and runs until most of the restrictions had been eased at the end of May 2021. During this period, the level of enforcement was at its highest, in relative terms.

## 1.7. Data and analysis

The analysis in this report is based on de-identified individual level data about FPNs issued in England and Wales. The data were provided by the ACRO Criminal Records office under a data sharing agreement. Further information about the data and methodology used in the report is provided in Annex 2.

The report includes FPNs issued by police officers in relation to breaches of restrictions on movement and travel, attending gatherings, and failure to comply with or follow instructions. The specific regulations and offences under which FPNs included in the analysis were issued are listed in Annex 3. The report does not include FPNs issued in relation to local lockdowns, businesses and hospitality, organisation of large gatherings, international travel, and face coverings. It also excludes FPNs issued by the British Transport Police. Details of why these FPNs were excluded are included in Annex 2.

Some of the analysis involved counting fines, while some involved counting people. Analysis that examines the number or rate of FPNs was based on the total number of fines issued, no matter who received them. Analysis that examined the profile of FPN recipients (e.g., by age, sex, ethnicity, and area deprivation) was based on the number of people who were fined. Further details on this are included in Annex 2.

Population data were used to calculate FPN rates, to allow for comparison across countries and police force areas, and to compare the profile of FPNs issued by age, sex, and ethnicity. For most of the analysis, population rates were calculated using

the 2020 Annual Population Survey (APS) data. However, population-based analysis in relation to ethnicity across police forces was based on data from the 2016 ONS ethnic group mid-year population estimates, consistent with the previous NPCC report (APS data on ethnicity is not available at a PFA level). More detail on population rates is included in Annex 2.

Statistical tests, with a 95% confidence threshold, were used to identify any significant differences between groups. Further details of the analytical approach (including calculating disproportionality, measuring statistical significance, and data limitations) are contained in Annex 2.

The report uses Office for National Statistics (ONS) recommended terminology<sup>18</sup> for describing people from different ethnic groups. The two aggregate categories in the report are 'white (including white minorities)' and 'ethnic minorities (excluding white minorities)'. For brevity, when reporting aggregate ethnic categories the terms 'white' and 'ethnic minority' are used in tables and figures. Due to small numbers, five broad categories are reported: white, Asian, black, mixed, and other. Further details on how data on ethnicity was defined and examined are included in Annex 2.

Data for England are presented alongside equivalent data for Wales throughout the report. However, due to the differences in regulatory provisions, lockdown timings, and payment structures between the two countries (discussed in Section 1.2), comparisons should be treated with caution.

It is impossible from the analysis to identify the extent to which any disproportionality in the issuing of FPNs resulted from patterns of public behaviour, differential patterns of reporting breaches to the police, or unfair or discriminatory policing practices. Further research would be needed to fully explain these patterns. Nevertheless, this report will be of value in any further review of policing activity during the pandemic.

## 1.8. Report structure

The report is structured as follows. Part two provides a high-level overview of the number and rate of FPNs issued and how this changed during the pandemic. Part three presents data on the demographic profile of individuals issued with FPNs in relation to age, sex, and ethnicity, and how these varied between different groups. Part four looks the geographic profile of those issued with FPNs and differences in the profile of fine recipients based on area deprivation. Part five examines variation in police use of FPNs across the 43 territorial Police Force Areas covering England and Wales. Part six compares the profile of those people who were issued repeat FPNs with those who received only one. Part seven looks at the outcome of FPNs, including the profile of those that were cancelled and those that were paid, and how

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<sup>18</sup> Office for National Statistics (2021) [Writing about ethnicity](#)

this varied across PFAs and by demographic characteristics. Concluding comments are presented in part eight.

## 2. Overview of FPNs issued in England and Wales

This part of the report provides an overview of all FPNs issued in England and Wales, including trend data over time, and the reasons for issuing tickets. Note that the analysis in this section is based on fines issued, not individuals who were fined, and, as such, does not account for the issue of repeat FPNs to individuals.

### 2.1. Number and rate of FPNs issued

Between 27 March 2020 and 31 May 2021, a total of 122,506 FPNs were issued in England (110,502) and Wales (12,004) in relation to breaches of the Regulations on movement and travel, attending gatherings, and failure to comply with or follow instructions. In absolute terms, this is far lower than the number of FPNs typically issued for motoring offences: in 2019, police forces in England and Wales recorded over one million motoring offences which resulted in an FPN.<sup>19</sup> It is, however, much higher than the number of Penalty Notices for Disorder (a type of FPN for low-level offences) typically issued: in 2021 around 13,000 of these notices were issued.<sup>20</sup>

Taking population size into account (see Annexes 2 and 4), the rate of FPNs issued per 10,000 population aged 18 or over was 25.3 in England and 48.3 in Wales. As a ratio, this means that the rate of FPNs issued in Wales was 1.9 times greater than in England, a difference that is statistically significant. Table 2 provides a more detailed breakdown of the number, proportion, and rates of FPNs issued within each of the three time periods.

**Table 2. Number, percentage, and rate of FPNs issue by country and period, and ratio of rates between England and Wales by period, 27 March 2020 and 31 May 2021**

Time Period*	Number of FPNs issued**		Percent of FPNs issued		Rate of FPNs issued per 10,000 population age 18+		Ratio of rates Wales: England***
	England	Wales	England	Wales	England	Wales	
Period 1	16,818	2,762	15.2%	23.0%	3.8	10.9	<b>2.9</b>
Period 2	18,117	1,516	16.4%	12.6%	4.1	6.0	<b>1.5</b>
Period 3	75,413	7,712	68.3%	64.3%	17.0	30.4	<b>1.8</b>

Notes:

\*Period 1: 27 March - 3 July 2020; Period 2: 4 July - 31 December 2020; Period 3: 1 January - 31 May 31 2021.

\*\*Number of FPNs issued does not total 122,506 as date of issue was not recorded for 168 FPNs.

\*\*\*The ratio of rates was calculated by dividing the rate for Wales by the rate for England. Statistically significant ratios are shown in bold.

<sup>19</sup> Home Office (2020) [Police powers and procedures, England and Wales, year ending 31 March 2020. Second Edition](#) (para. 6.2)

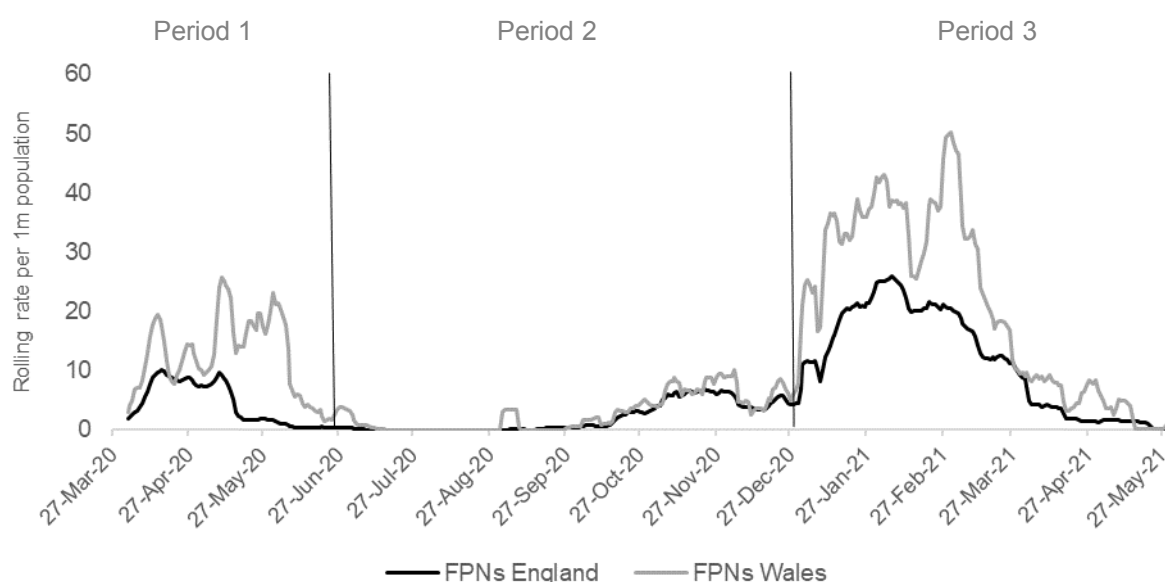
<sup>20</sup> Ministry of Justice (2022) [Criminal Justice Statistics quarterly, England and Wales, year ending December 2021 \(annual\)](#) (Figure 2)



According to Table 2, around two thirds of FPNs in both England and Wales were issued during period three (covering January to May 2021). In England, the proportion of FPNs issued during periods one and two was broadly equal (at around 15% to 16%), whereas in Wales almost twice as many FPNs were issued in period one (23.0%) compared to period two (12.6%). This suggests a greater emphasis on enforcement during the first lockdown period in Wales, compared to the rest of 2020, and more balanced levels of enforcement over the first two periods in England.

The 'ratio of rates' in Table 2 shows that, when taking account of population size, the rate of FPNs issued per 10,000 adults living in Wales was higher than that for England across each of the three periods. The gap in rates between Wales and England was greatest during period 1 (a ratio of 2.9) and smallest during period 2 (a ratio of 1.5); however, these differences were statistically significant at all three periods. Note that differences in the nature and timing of restrictions, and patterns of illegal travel, may have contributed to these differences in rates between countries. This is discussed further in later sections of the report.

Temporal change in the rate of FPNs issued is shown in more detail in Figure 1, which compares the seven-day rolling average rate of FPNs per 1m population for England and Wales over the whole period. The rolling average helps to iron out daily fluctuations in numbers and shows very clearly that the rate of FPNs issued in Wales was considerably higher than England during periods one and three.



**Figure 1. Seven day rolling average rate of FPNs issued per 1 million population by period\*, 27 March 2020 to 31 May 2021, England and Wales**

\*Period 1: 27 March - 3 July 2020; Period 2: 4 July - 31 December 2020; Period 3: 1 January - 31 May 2021.

In England, the rate of enforcement was fairly stable during April 2020, and tailed off during May; whereas, in Wales, the rate rose steadily throughout April and May, with some large spikes in activity, before falling sharply in June 2020. In part, this difference is likely to reflect legislative differences and the earlier easing of restrictions in England.

Figure 1 shows that in period two the patterning of FPNs was largely consistent in England and Wales, with increasing but relatively low levels of enforcement from September 2020 onwards which reflect the tightening of restrictions (including the firebreak in Wales and the second national lockdown in England). In period three, the use of FPNs rose sharply in early 2021 in both countries, although the rate of issue is noticeably higher in Wales from the start of the year. In England, the rate of FPNs peaked in early February and fell consistently thereafter; whilst, in Wales, the rate of FPNs continued to increase until early March before falling sharply. Restrictions were still in place in both countries at this time.

## 2.2. Reasons for issuing FPNs

Police officers were required to record the reason for issuing an FPN under the Regulations. In most cases, officers also recorded some information about where the encounter took place (such as whether it involved an indoor or outdoor locus). This information is useful as it helps to identify whether the nature of demand for policing differed between England and Wales.

Table 3 shows the number and proportion of fines issued by reason. In England, two thirds (66.5%) of FPNs were issued for involvement in illegal gatherings, while less than a third related to travel or movement (28.9%). A different pattern is evident in Wales, where almost half (48.8%) of FPNs were issued for involvement in illegal gatherings and around the same proportion (47.1%) were issued in relation to travel or movement. Less than one in twenty FPNs issued in both countries were recorded as being due to failure to comply with instructions, or obstructing someone in their duty in respect of upholding the Regulations.

**Table 3. Number and proportion of FPNs issued by reason for issue, 27 March to 31 May 2021, England and Wales**

Reason for FPN issue	Number of FPNs by offence type		Percentage of FPNs by offence type	
	England	Wales	England	Wales
Failure to follow instruction/obstruction	5,033	477	4.6%	4.1%
Movement or travel	31,683	5,506	28.9%	47.1%
Attending an illegal gathering	72,847	5,699	66.5%	48.8%
<b>Total</b>	<b>109,563</b>	<b>11,682</b>	<b>100.0%</b>	<b>100.0%</b>

Note: Number of FPNs issued does not total 122,506 as reason for issue was not recorded for 1,261 FPNs.

Looking in more detail at the locus of illegal gatherings, Table 4 shows that (where specified) the proportion of all gatherings that involved indoor events (for example, people’s houses or private venues) was higher in Wales (85.9%) than England (71.1%). Correspondingly, the proportion of FPNs issued due to outdoor gatherings (for example, in parks, gardens or scenic beauty spots) was twice as high in England (27.5%) as Wales (13.1%).

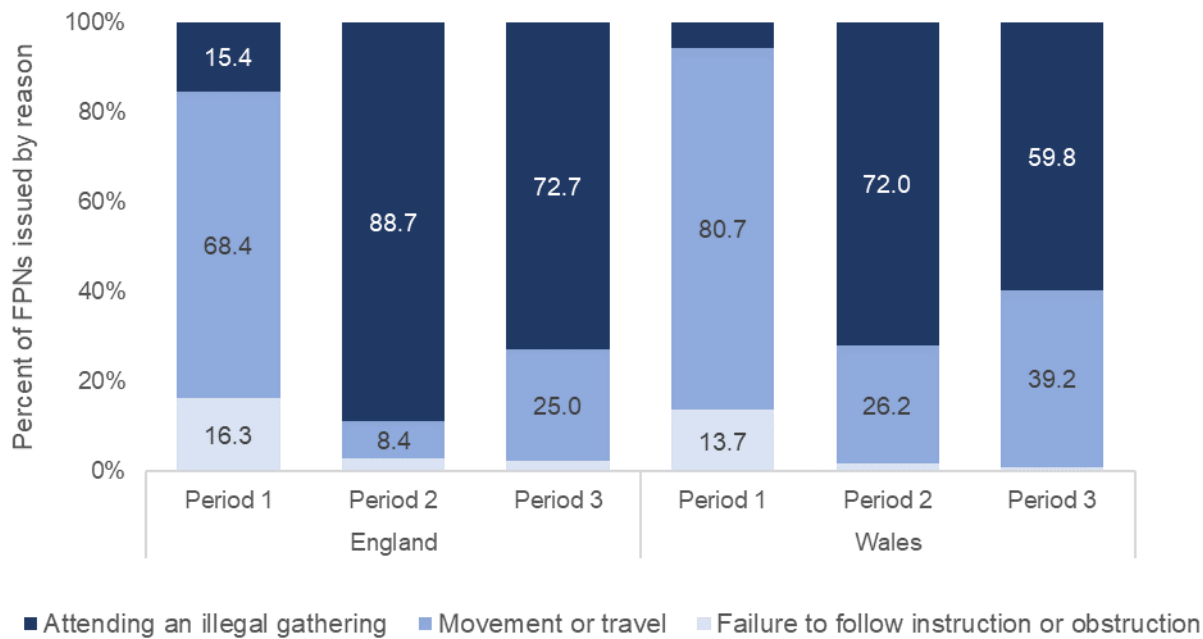
**Table 4. Number and proportion of FPNs issued for illegal gatherings by locus, 27 March to 31 May 2021, England and Wales**

	Number of FPNs by locus of gathering		Percentage of FPNs by locus of gathering	
	England	Wales	England	Wales
Not specified	989	61	1.4%	1.1%
Indoor gathering	51,809	4,894	71.1%	85.9%
Outdoor gathering	20,049	744	27.5%	13.1%
<b>Total</b>	<b>72,847</b>	<b>5,699</b>	<b>100%</b>	<b>100.0%</b>

Note: Percentage totals may not equal 100% due to rounding.

### 2.3. Reasons for issuing FPNs and change over time

Figure 2 compares the proportion of all FPNs issued within each period by reason, for England and Wales. While the overall pattern of change across the three periods was fairly similar for both countries (i.e., a shift from predominantly movement/travel to attending illegal gatherings), it is notable that the percentage of FPNs issued for movement and travel was consistently larger in Wales during each period.



**Figure 2. Proportion of FPNs by reason for issue by period, 27 March 2020 to 31 May 2021, England and Wales**

It is possible that the higher proportion of FPNs issued for illegal movement and travel in Wales resulted from individuals visiting from other parts of the UK. For example, on 8 May 2020 the Welsh Government extended its lockdown for three weeks, with a ‘stay at home’ message in place until 1 June 2020.<sup>21</sup> Conversely, on 10 May the UK Government changed its key message on social distancing from ‘stay at home’ to a more ambiguous ‘stay alert’ for people in England and started to ease restrictions from 11 May.<sup>22</sup> As such, it is possible that confusion around differences in legislative regimes may have contributed to an increase in illegal travel into Wales prior to the restrictions being lifted. The issue of FPNs being issued to non-residents of police force areas is discussed in Part Five.

<sup>21</sup> Welsh Government. 8 March 2020. [Wales extends coronavirus lockdown](#)

<sup>22</sup> UK Government. 10 May 2020. [Prime Minister's statement on coronavirus \(COVID-19\)](#)

### 3. Demographic profile of FPN recipients

This part of the report examines the profile of the people who received FPNs between 27 March 2020 and 31 May 2021 using individual level data. Note that the number of people who received an FPN (n=116,107) is smaller than the total number of FPNs issued (n=122,506) as some individuals received more than one fine under the Regulations.

#### 3.1. Sex profile of FPN recipients

The number and overall percentage of FPNs issued to men and women within England and Wales is shown in Table 5. In both countries, males accounted for a significantly higher proportion of all FPNs compared to their relative share of the population (49% in both England and Wales).<sup>23</sup> The proportion of male FPN recipients was slightly, but significantly, higher in England (70.6%) than Wales (66.1%).

Table 5 also shows the rate per 10,000 males and females aged 18 or over who received at least one FPN, and the ratio between the rates for males and females, in each country. Overall, the rate per capita for males was 2.4 times that for females; however, this was higher in England (2.5) than Wales (2.0).

**Table 5. Number, percentage, and rate of FPN recipients by sex, and sex ratio between males and females, 27 March 2020 and 31 May 2021, England and Wales**

	Number of FPN recipients*		Percentage of FPN recipients within country		Rate of FPN recipients per 10,000 population		Sex ratio male: Female**
	Male	Female	Male	Female	Male	Female	
<b>England</b>	73,224	30,565	70.6%	29.4%	34.2	13.7	<b>2.5</b>
<b>Wales</b>	7,579	3,886	66.1%	33.9%	62.2	30.6	<b>2.0</b>
<b>Total</b>	80,803	34,451	70.9%	29.1%	35.7	14.6	<b>2.4</b>

Notes:

\* Number of FPN recipients does not total 116,107 as sex was not recorded for 853 individuals..

\*\*The sex ratio was calculated by dividing the rate for males by the rate for females. Ratios that were statistically significant are shown in bold.

Survey data for the UK suggest ‘complete compliance’ with the Regulations was higher amongst females than males throughout the pandemic, although ‘majority compliance’ was virtually identical.<sup>24</sup> The disproportionality between males and

<sup>23</sup> Based on 2020 Annual Population Survey data

<sup>24</sup> See Figures 2i and 2u in Fancourt, D. et al. (2021) [Covid-19 Social Study: Results Release 33](#)

females in the extent of enforcement may well reflect disparities in self-reported compliance to some extent. However, it is likely that factors other than the person's sex contributed to the patterning of enforcement in both countries.

### 3.2. Sex and change over time

The sex profile of FPN recipients changed over the three periods and varied between England and Wales. Table 6 shows that males received FPNs for breaching the Regulations at a significantly higher rate than females across all three periods in both countries.

The male to female sex ratio was highest during period one in England (4.5) and Wales (3.4). During period two, the proportion of FPNs issued to females increased to around a third in both England and Wales, and the sex ratio was virtually identical in both countries (1.9 and 2.0, respectively). However, during period three, the proportion of FPNs issued to females increased in Wales but reduced in England. This led to a widening of the sex ratio in England (to 2.4) but a narrowing of the ratio in Wales (to 1.7). These diverging trends suggest that there may have been underlying sex differences in changing patterns of public behaviour and/or enforcement in England and Wales as the pandemic wore on.

**Table 6. Number, percentage and rate of FPN recipients by sex and period, and sex ratio between males and females, 27 March 2020 to 31 May 2021, England and Wales**

	Number of FPN recipients*		Percentage of FPN recipients		Rate of FPN recipients per 10,000 population		Sex ratio Male: Female**
	Male	Female	Male	Female	Male	Female	
<b>England</b>							
Period 1	12,660	2,935	81.2%	18.8%	5.9	1.3	<b>4.5</b>
Period 2	11,358	6,123	65.0%	35.0%	5.3	2.7	<b>1.9</b>
Period 3	50,160	21,753	69.8%	30.2%	23.4	9.8	<b>2.4</b>
<b>Wales</b>							
Period 1	2,033	618	76.7%	23.3%	16.7	4.9	<b>3.4</b>
Period 2	965	512	65.3%	34.7%	7.9	4.0	<b>2.0</b>
Period 3	4,639	2,790	62.4%	37.6%	38.1	22.0	<b>1.7</b>

Notes:

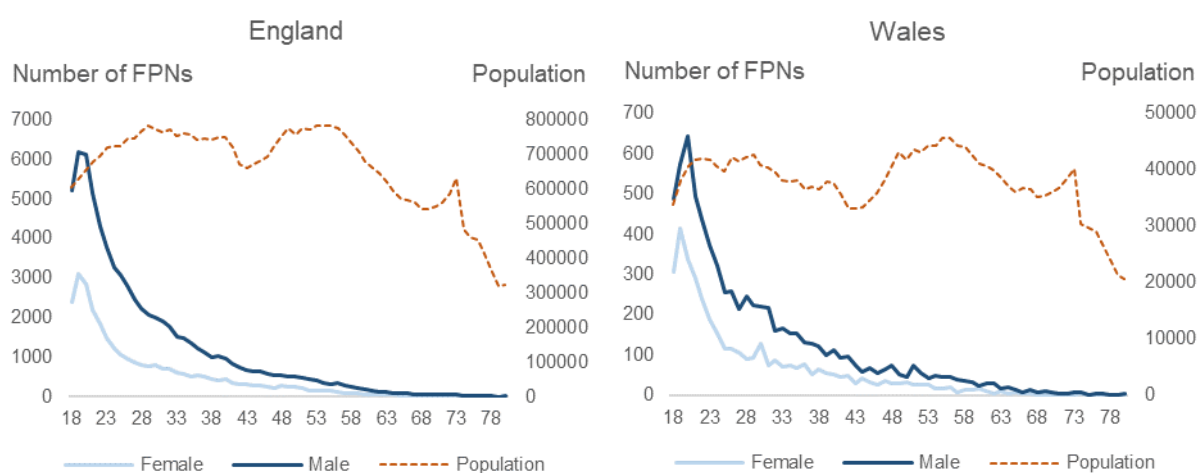
\* Number of FPN recipients totals more than 116,107 as some individuals who received fines in more than one period were counted more than once. Sex was not recorded for 853 individuals.

\*\*The sex ratio was calculated by dividing the rate for males by the rate for females. Ratios that were statistically significant are shown in bold.

### 3.3. Age profile of FPN recipients

Figure 3 compares the age profile of male and female FPN recipients to the national population for England and Wales. It shows that FPN recipients in both countries were much younger than the overall population profile, reflective of an ‘age-crime curve’ typically found in offending data.

As discussed above, the sex gap in the number of FPNs issued to men and women was significantly narrower for Wales than for England. This is evident in Figure 3, especially amongst those at the youngest end of the age spectrum. Nevertheless, the overall age profile for male and female FPN recipients was very similar in England and Wales.



**Figure 3. Age profile of FPN recipients and population aged 18+, 27 March 2020 to 31 May 2021, England and Wales**

Table 7 groups the FPN recipients into six age bands and examines the number, percentage, and rate per 10,000 population. As demonstrated in Figure 3, in both countries younger people were over-represented, compared to their population share, while older people were under-represented in both countries. Almost half of those who received FPNs were aged between 18 and 24, more than four times higher than their respective population share. Conversely, just over 1 in 10 FPNs in both countries were issued to people aged 45 or over, who make up more than half of the population.

The rate of FPN recipients by age group emphasises the much greater likelihood of receiving an FPN for breaching the Regulations amongst younger people. Table 7 also shows that, although the degree of over-representation among people aged 18-24 in England and Wales was very similar, the recipient rate per 10,000 people in Wales was almost double that for England, at 191.7 and 106.6 respectively. Indeed, the rate of individuals issued with an FPN was higher across all age bands in Wales, compared to England. Further breakdowns by age and sex are provided in Annex 5.

**Table 7. Number, percentage (compared to population share) and rate of FPN recipients by age group, 27 March 2020 to 31 May 2021, England and Wales**

Age band	Number of FPN recipients*	Percent of FPN recipients **	Population share	Recipient rate per 10,000 population
<b>England</b>				
18-24	49,144	47.7%	10.6%	106.6
25-34	29,230	28.4%	17.4%	38.5
35-44	13,672	13.3%	16.3%	19.2
45-54	7,261	7.0%	17.3%	9.6
55-64	2,898	2.8%	15.5%	4.3
65+	861	0.8%	23.0%	0.9
Total	103,066	100.0%	100.1%	23.6
<b>Wales</b>				
18-24	5,256	46.1%	11.0	191.7
25-34	3,078	27.0%	14.9	82.9
35-44	1,614	14.2%	14.2	45.8
45-54	868	7.6%	16.8	20.8
55-64	447	3.9%	16.8	10.7
65+	143	1.3%	26.2	2.2
Total	11,406	100.1%	99.9%	45.9

Notes:

\* Number of FPN recipients does not total 116,107 as age and/or sex was not recorded for 1,635 individuals.

\*\*Percentage totals may not sum to 100% due to rounding.

Survey data shows that younger people were less likely to comply with the Regulations – especially as the pandemic wore on.<sup>25</sup> A greater tendency to break the rules by young people may have been related to lower perceptions of, or less concern about, the risk of the disease, compared to people in older age-groups.

Higher levels of enforcement may also be because younger people were more likely to come to the attention of the police, especially in relation to large gatherings and noisy parties. This was proposed as a potential reason for age disproportionality in policing by the Joint Committee on Human Rights, which noted that young people: *“...may be more likely to socialise outside as they have less private space of their own—potentially sharing homes with families, friends or near-strangers in shared accommodation—or living in very small, cramped accommodation. As such, socialising would be more noticeable to police. In contrast, those with their own*

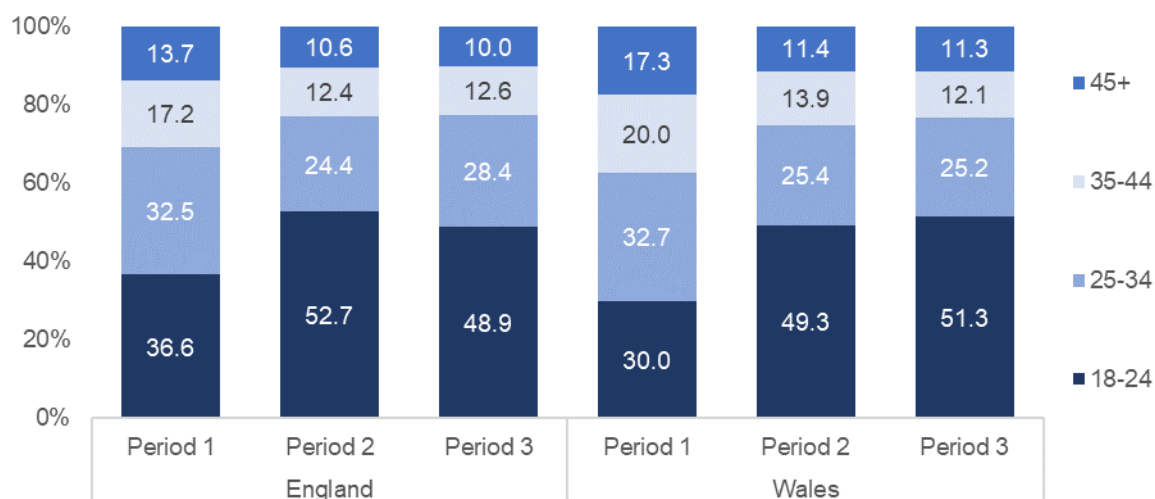
<sup>25</sup> See Figures 2a and 2m in Fancourt, D. et al. (2021) [Covid-19 Social Study: Results Release 33](#)



homes might be more likely to break the rules in a much less visible way” (2021: para. 42).<sup>26</sup>

### 3.4. Age and change over time

As discussed earlier, the number of FPNs issued in England and Wales varied across the three time periods. Figure 4 shows how the overall age profile of FPN recipients changed across these periods. There was a marked increase in the proportion of people aged 18-24 who received FPNs between periods one and two in both England and Wales. People in this age category rose from representing around a third of all recipients, to around a half in both countries. This was accompanied by relative declines in all of the other three age categories. The age profile during period three remained fairly consistent with that for period two. More detailed information on the number and rate of people in each age group by period can be found in Table A5 in Annex 5.



**Figure 4. Change in age profile of FPN recipients by period, 27 March 2020 to 31 May 2021, England and Wales**

### 3.5. Ethnic profile of FPN recipients

The majority of individuals issued with FPNs for breaching the Regulations in England and Wales came from a white background (including white minorities), with one in five issued to individuals from an ethnic minority background (excluding white minorities). However, as shown below, the difference in the absolute numbers conceals a relative over-representation of those from ethnic minorities (who make up only 13.7% of the population in England and 5.2% in Wales).

<sup>26</sup> House of Commons and House of Lords Joint Committee on Human Rights (2021) [The Government response to covid-19: fixed penalty notices](#)

Table 8 shows the number and proportion of FPN recipients by ethnic group, the respective population share, the FPN recipient rate per 10,000 population, and the disparity rate between FPN recipients from different ethnic minorities, compared to white recipients. In England, over a quarter (27.0%) of individuals issued with FPNs were from an ethnic minority background (excluding white minorities), which is around double the population share (13.7%). Translating these figures into rates per 10,000 people aged 18 or over, Table 8 shows that the rate of FPNs issued to people from an ethnic minority background was in England was 46.1, compared to 19.9 for white individuals, reflecting an overall ethnic disparity rate of 2.3.<sup>27</sup>

**Table 8. Number, percentage (compared to population share) and rate of FPN recipients by ethnic group, 27 March 2020 to 31 May 2021, England and Wales**

Ethnic group	No. of FPN recipients*	Percent of FPN recipients**	Population share	FPN recipient rate per 10,000 pop.	Disparity rate EM:W***
<b>England</b>					
White	74,983	73.0%	86.3%	19.9	
Ethnic minority	27,687	27.0%	13.7%	46.1	<b>2.3</b>
<i>Asian</i>	13,395	13.0%	7.5%	41.1	<b>2.1</b>
<i>Black</i>	9,189	8.9%	3.3%	63.8	<b>3.2</b>
<i>Mixed</i>	2,741	2.7%	1.1%	55.3	<b>2.8</b>
<i>Other</i>	2,362	2.3%	1.9%	29.2	<b>1.5</b>
<b>Wales</b>					
White	10,181	89.3%	95.2%	42.7	
Ethnic minority	1,224	10.7%	5.2%	119.0	<b>2.8</b>
<i>Asian</i>	685	6.0%	2.1%	133.0	<b>3.1</b>
<i>Black</i>	218	1.9%	0.7%	122.8	<b>2.9</b>
<i>Mixed</i>	231	2.0%	0.6%	150.7	<b>3.5</b>
<i>Other</i>	90	0.8%	0.7%	49.2	1.2

Notes:

\* Number of FPN recipients does not total 116,107 as ethnicity and/or age was not recorded for 2,032 individuals.

\*\* Percentage totals may not sum to 100% due to rounding.

\*\*\* Ethnic disparity was calculated by dividing the rates for each of the ethnic minority groups by the rate for the white group. Statistically significant disparity rates are shown in bold.

<sup>27</sup> A disparity rate of 1 would mean that FPNs were issued to ethnic minority people at the same rate as white people; a value over 1 would mean that FPNs were issued at a higher rate for those from ethnic minority groups than those from the white population; and a value below 1 would mean that FPNs were issued to those in the white population at a higher rate than those from ethnic minority groups.

Table 8 also shows the rate of individuals issued with FPNs in specific ethnic minority groups. Although the number of FPNs issued to people from ethnic minorities was much smaller than the number issued to white people in absolute terms, individuals from all ethnic minority groups in England were relatively more likely than white people to receive an FPN, based on their population share.

When comparing population rates, people from black backgrounds in England were 3.2 times more likely to have been issued an FPN than those from white backgrounds, while those from Asian, mixed, and other ethnic minority backgrounds had equivalent disparity rates of 2.1, 2.8, and 1.5 respectively. All the disparity rates shown in Table 8 were statistically significant, with the single exception of the difference between the other ethnic minority group and the white group in Wales.

The overall degree of ethnic disproportionality in Wales was higher, compared to England. In absolute terms, only one in ten (10.7%) FPN recipients in Wales were from an ethnic minority; however, this was twice the number expected based on population share. When taking population size into account, the FPN recipient rate per 10,000 people living in Wales was 119.0 for people from an ethnic minority group, compared to 42.7 for white individuals, reflecting an ethnic disparity rate of 2.8.

In Wales, disparity rates were largest for those from mixed (3.5) and Asian backgrounds (3.1) when compared to those from white backgrounds. Those from black backgrounds were 2.9 times more likely to have been issued with an FPN than those from white backgrounds. Of the different ethnic groups, those from other ethnic minority backgrounds had the lowest disparity rate, at 1.2, compared to those from white backgrounds.

As noted in part two, caution should be exercised when interpreting these rates given the unknown degree of error in the population data for ethnic groups. This is particularly important in respect of Wales, where the total number of FPNs issued to people from an ethnic minority background over the 14-month period (n=1,255) was very small in absolute terms. The degree of uncertainty around the population estimates for ethnic groups means that no robust conclusions can be drawn from these figures about biased or unfair policing practices.

In addition, it is important to note that a large proportion of FPNs in Wales were issued to individuals who did not live in the issuing police force or, indeed, in Wales. Therefore, it is important to take account of the proportion of FPNs issued to non-residents. Data presented in Part Five suggest that the higher level of ethnic disproportionality in Wales was at least partially accounted for individuals from ethnic minority backgrounds (excluding White minorities) travelling into the country while the restrictions were still in place.

### 3.6. Ethnicity and change over time

Table 9 shows how the distribution of FPNs issued to people from different ethnic groups in England and Wales changed over the three periods. Figures for individual ethnic groups in Wales are not shown due to small numbers.

During all three periods, the proportion of FPNs issued to people from ethnic minority groups in England and Wales was higher than expected based on population share. The degree of ethnic disproportionality was smallest during period two, when the level of enforcement was at its lowest; nevertheless, people from an ethnic minority background were still more likely to receive an FPN than those from a white background during this period.

**Table 9. Number and percentage of FPNs recipients by ethnic group and disparity rate, by lockdown period, England and Wales**

Ethnic group	Period 1		Period 2		Period 3		Population share**
	Number*	%**	Number*	%**	Number*	%**	
<b>England</b>							
White	11,733	76.8%	13,726	78.7%	50,900	70.9%	86.3%
Ethnic minority	3,539	23.2%	3,710	21.3%	20,878	29.1%	13.7%
<i>Asian</i>	2,010	13.2%	1,727	9.9%	9,878	13.8%	7.5%
<i>Black</i>	960	6.3%	1,337	7.7%	7,053	9.8%	3.3%
<i>Mixed</i>	302	2.0%	373	2.1%	2,096	2.9%	1.1%
<i>Other</i>	267	1.7%	273	1.6%	1,851	2.6%	1.9%
<b>Wales</b>							
White	2,227	84.2%	1,357	91.6%	6,733	90.6%	95.9%
Ethnic minority	417	15.8%	124	8.4%	696	9.4%	4.1%

Notes:

\* Number of FPN recipients totals more than 116,107 as some individuals who received fines in more than one period were counted more than once. Ethnicity and/or age was not recorded for 853 individuals.

\*\*Percentage totals may not sum to 100% due to rounding.

The percentage of all FPNs issued to individuals from an ethnic minority background in England fell slightly between periods one and two (from 23.2% to 21.3%, respectively); however, it increased to higher than its original level during period three (to 29.1%). By contrast, in Wales the percentage of all FPNs issued to individuals from an ethnic minority background fell by around half between periods one and two (from 15.8% to 8.4%, respectively), and then increased only marginally during period three (to 9.4%). As with the sex patterns in the data, this suggests that change over time in patterns of enforcement in England and Wales may have been influenced by different underlying factors or circumstances.

Importantly, the overall figures for ethnic minorities in England conceal underlying differences between specific groups which are worthy of note. For example, the proportion of FPNs issued to people from black backgrounds increased consecutively across the three periods, including between periods one and two which was not evident for other groups. As such, further investigation into the reasons for such differences between ethnic groups may be warranted.

### 3.7. Disparity rates and change over time

Table 10 shows the degree of disparity between the FPN rate per 10,000 population issued to people from ethnic minority backgrounds compared to the rate of FPNs per 10,000 people issued to those from white backgrounds, for each of the three periods. Note that only aggregate ethnic minority data are shown for Wales, due to small numbers. All the disparity in rates between white and ethnic minority groups were statistically significant except for the other ethnic group in England during periods one and two.

**Table 10. Disparity between FPN recipient rates per 10,000 population by ethnic group (compared to the white group), 27 March 2020 to 31 May 2021, England and Wales**

	Period 1	Period 2	Period 3
<b>England</b>			
Ethnic minority	<b>1.9</b>	<b>1.7</b>	<b>2.6</b>
<i>Asian</i>	<b>2.0</b>	<b>1.5</b>	<b>2.2</b>
<i>Black</i>	<b>2.1</b>	<b>2.5</b>	<b>3.6</b>
<i>Mixed</i>	<b>2.0</b>	<b>2.1</b>	<b>3.1</b>
<i>Other</i>	1.1	0.9	<b>1.7</b>
<b>Wales</b>			
Ethnic minority	<b>4.3</b>	<b>2.1</b>	<b>2.4</b>

Note: Disparity rates that were statistically significant are shown in bold.

In England and Wales, the rate of FPNs issued to people in each ethnic minority group was higher than that for people in the white group, except for people from other ethnic groups in England during period two. The overall disparity rate for both countries was lowest during period two, when enforcement levels were at their lowest generally.

The disparity rate was highest in Wales during period one (4.3), and in England during period three (2.6), which suggests that the factors responsible for differences in the ethnic profile in enforcement varied over time between the two countries. In addition, it is notable that while the disparity rate in Wales was consistently higher during each period than that in England, the degree of difference between the two countries reduced during period three such that they were almost the same. So, in

overall terms, ethnic disparity increased over time in England but reduced over time in Wales.

Looking at the disparity rates for specific ethnic minority groups in England, there appears to be no consistent pattern over time. During period one, the disparity rate was around two for all groups, except for those from other ethnic backgrounds. This increased to 2.5 for those from black backgrounds, but decreased to 1.5 for those from Asian backgrounds during period two (while remaining broadly similar for the other two groups). In period three, the disparity rate increased in all four groups.

### 3.8. Ethnicity, sex and change over time

Table 11 shows the disparity in rates of FPNs issued to men and women from ethnic minority backgrounds (compared to those from white backgrounds) for each of the three periods and by country. Note that due to small numbers at this level of disaggregation, these data are presented for all ethnic minorities compared to white only. All the differences in rates between men and women were found to be statistically significant, with the exception for those for women during period two which were non-significant for both England and Wales.

The data presented in Table 11 show that ethnic disparities in the use of FPNs were higher for males than females during all three time periods, and in both England and Wales. Like the analysis discussed above, ethnic disparities were generally lowest during period two; although, interestingly, women from ethnic minority backgrounds were less likely than white women to receive FPNs in England during period one. Like the earlier analysis, ethnic disparities increased between periods one and three for both men and women in England, whereas they decreased for both men and women in Wales. As a result, by period three, the ethnic disparities for men in England were slightly higher than those for men in Wales, although the ethnic disparities for women remained slightly higher in Wales than in England.

**Table 11. Disparity in FPN recipient rates per 10,000 population by ethnic group (compared to the white group), by sex and period, 27 March 2020 to 31 May 2021, England and Wales**

		Disparity rate Ethnic minority: White			
	Sex	Period 1	Period 2	Period 3	Total
England	Male	<b>2.2</b>	<b>2.1</b>	<b>3.1</b>	<b>2.8</b>
	Female	<b>0.8</b>	1.1	<b>1.6</b>	<b>1.4</b>
Wales	Male	<b>4.6</b>	<b>2.5</b>	<b>2.8</b>	<b>3.2</b>
	Female	<b>3.2</b>	1.4	<b>1.8</b>	<b>1.9</b>

Note: Disparity rates that were statistically significant are shown in bold.

### 3.9. Ethnicity, age and change over time

The disparity in rates of FPNs issued to people of different age groups from ethnic minority backgrounds (compared to those from white backgrounds) for each of the three periods and by country are shown in Table 12. Again, due to small numbers at this level of disaggregation, these data are only presented for all ethnic minorities compared to the white category. Almost all differences in rates were found to be statistically significant, with the exception of those for 18-24 year olds in England, and for 18-24 and 35-44 year olds in Wales, during period two.

Table 12 presents a variable picture of ethnic disparity by age group, both over time and by country. In England, disparity rates were highest for ethnic minorities aged 45 or over during periods two and three, although the disparity rates for this group were similar to those for other age groups during period one. There was an increase in ethnic disparity over time for those in the 25-34 and 35-44 age groups, whereas for those aged 18-24 the level of ethnic disparity remained the same at periods one and three, with no disparity in period two.

In Wales, ethnic disparity rates were higher for those aged 45 or over than for other age groups during all three periods, and were at their highest during period two, during which disparity rates for all other age-groups fell. Otherwise, ethnic disparities for all other age groups fell to around half of their original level between periods one and three.

**Table 12. Disparity in FPN recipient rates per 10,000 population by ethnic group (compared to the white group), sex and period, 27 March 2020 to 31 May 2021, England and Wales**

		Disparity rate Ethnic minority: White			
	Age-group	Period 1	Period 2	Period 3	Total
England	18-24	<b>1.6</b>	1.0	<b>1.7</b>	<b>1.5</b>
	25-34	<b>1.4</b>	<b>1.5</b>	<b>2.0</b>	<b>1.8</b>
	35-44	<b>0.9</b>	<b>1.2</b>	<b>1.4</b>	<b>1.2</b>
	45+	<b>1.4</b>	<b>2.5</b>	<b>3.3</b>	<b>2.8</b>
Wales	18-24	<b>2.5</b>	0.9	<b>1.3</b>	<b>1.4</b>
	25-34	<b>3.3</b>	<b>2.1</b>	<b>1.7</b>	<b>2.2</b>
	35-44	<b>3.0</b>	0.6	<b>1.5</b>	<b>1.8</b>
	45+	<b>3.5</b>	<b>4.2</b>	<b>3.4</b>	<b>3.5</b>

Note: Statistically significant disparity rates are shown in bold.

Generally speaking, these findings suggest that ethnic disparities increased over time for all those aged 25 or over in England; but reduced for all age-groups in Wales, bar those aged 45 or over. There also seems to be unusual ethnic differences at the top and bottom end of the age spectrum that may be worthy of further investigation. Note that the total number of FPNs issued to people from ethnic minority backgrounds aged 45 and over was small, especially in Wales, compared to other age groups so caution should be exercised in drawing any conclusions from these findings.



## 4. Area deprivation profile of FPN recipients

This part of the report examines the level of deprivation in the areas where FPN recipients were living at the time of the offence, for England and Wales. The Joint Committee on Human Rights (2021) noted that those living in the most socially deprived areas were most likely to have received an FPN under the Coronavirus Regulations; however, this evidence was based solely on research conducted in Scotland.<sup>28</sup>

Using the Scottish Index of Multiple Deprivation (SIMD) to examine all FPNs issued between 27 March 2020 and 31 May 2021, Gorton et al (2022) found that around one in five (22.2%) FPNs were issued to people living in the 10% most deprived datazones of Scotland, while less than one in ten (8.6%) were issued to those living in the 10% least deprived datazones.<sup>29</sup> This represents a disparity of 2.6 in the likelihood of receiving an FPN between those living in areas at the top and bottom of the deprivation scale. However, this disparity changed substantially over time, reducing from 12.6 during the first Scottish lockdown (broadly comparable to period one of this report) to 2.5 during the second (broadly comparable to period three of this report). To date, no research has been conducted on the socio-economic profile of those to whom FPNs were issued in England or Wales.

### 4.1. Data used in the analysis

Official measures of deprivation are calculated separately for England and Wales. The Index of Multiple Deprivation (IMD) is the official measure of relative deprivation in England, comprising information from seven domains.<sup>30</sup> The Welsh Index of Multiple Deprivation is the official measure for Wales, comprising information from eight domains.<sup>31</sup> Both measures are generated for small areas known as 'Lower Layer Super Output Areas' (LSOAs) in each country. LSOAs have an average population of around 1,500 people, as such they encompass larger population areas than Scotland's datazones.

Note that the analysis in this report differs from that conducted in Scotland in two main ways. Firstly, the Scottish research was based on all FPNs and so the degree of disparity between the most and least deprived areas may have been artificially

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<sup>28</sup> Reference to McVie, S. (2021) in House of Commons and House of Lords Joint Committee on Human Rights (2021) [The Government response to covid-19: fixed penalty notices](#).

<sup>29</sup> See Section 5 of Gorton et al (2022) [Police Use of Covid-19 Fixed Penalty Notices in Scotland](#). Datazones are small geographical area units used to calculate neighbourhood statistics in Scotland (they are roughly equivalent to Lower Super Output Areas in England and Wales). Each datazone contains around 500-1000 people.

<sup>30</sup> For more information on the IMD, see: [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](#)

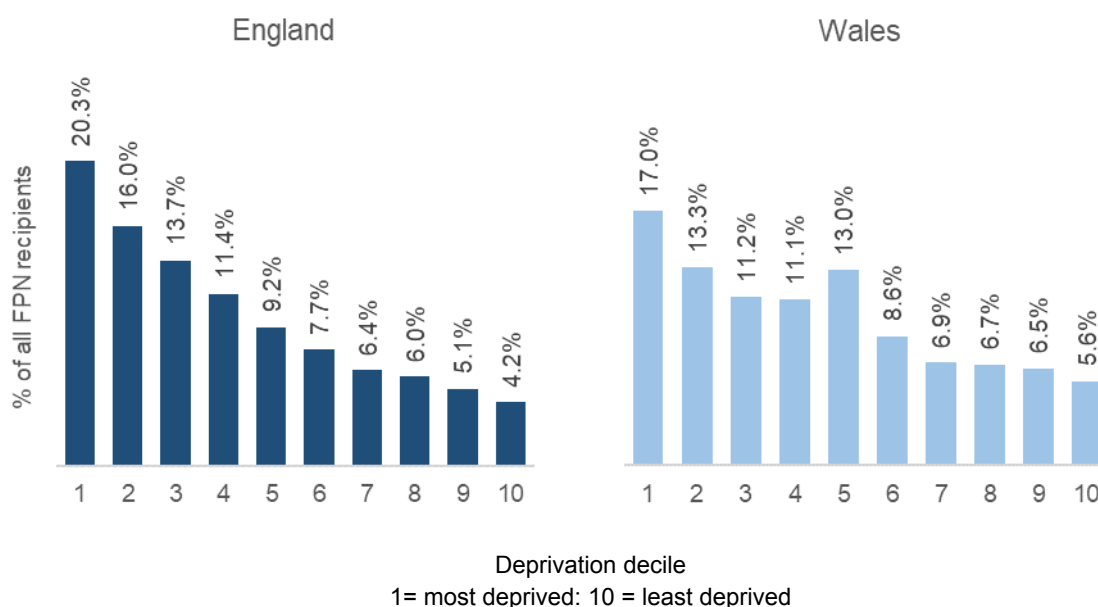
<sup>31</sup> For more information on the WIMD, see: [Welsh Index of Multiple Deprivation: index guidance | GOV.WALES](#)

inflated by individuals who received more than one FPN (who may have been more likely to be living in areas of high deprivation). The analysis of the data for England and Wales focuses on individual FPN recipients, so avoids this problem of over-inflation. Secondly, the Scottish study focused only on those individuals who were resident in Scotland (and took no account of people who travelled from other parts of the UK). As there was a fair degree of cross-over between England and Wales, the analysis in this report examines the deprivation level in the home area of FPN recipients for either England or Wales (regardless of where they received the FPN).

Figure 5 shows that, between March 2020 and May 2021, one in five (20.3%) people who received an FPN in England were living in one of the 10% most deprived LSOAs in either England or Wales. This means that FPN recipients were twice as likely to be living in an area of high deprivation as the population average.

Meanwhile, less than one in twenty (4.2%) were living in one of the 10% least deprived LSOAs. This represents a disparity of 4.8 in the likelihood of receiving an FPN between those living in the most and least deprived areas of either England or Wales.

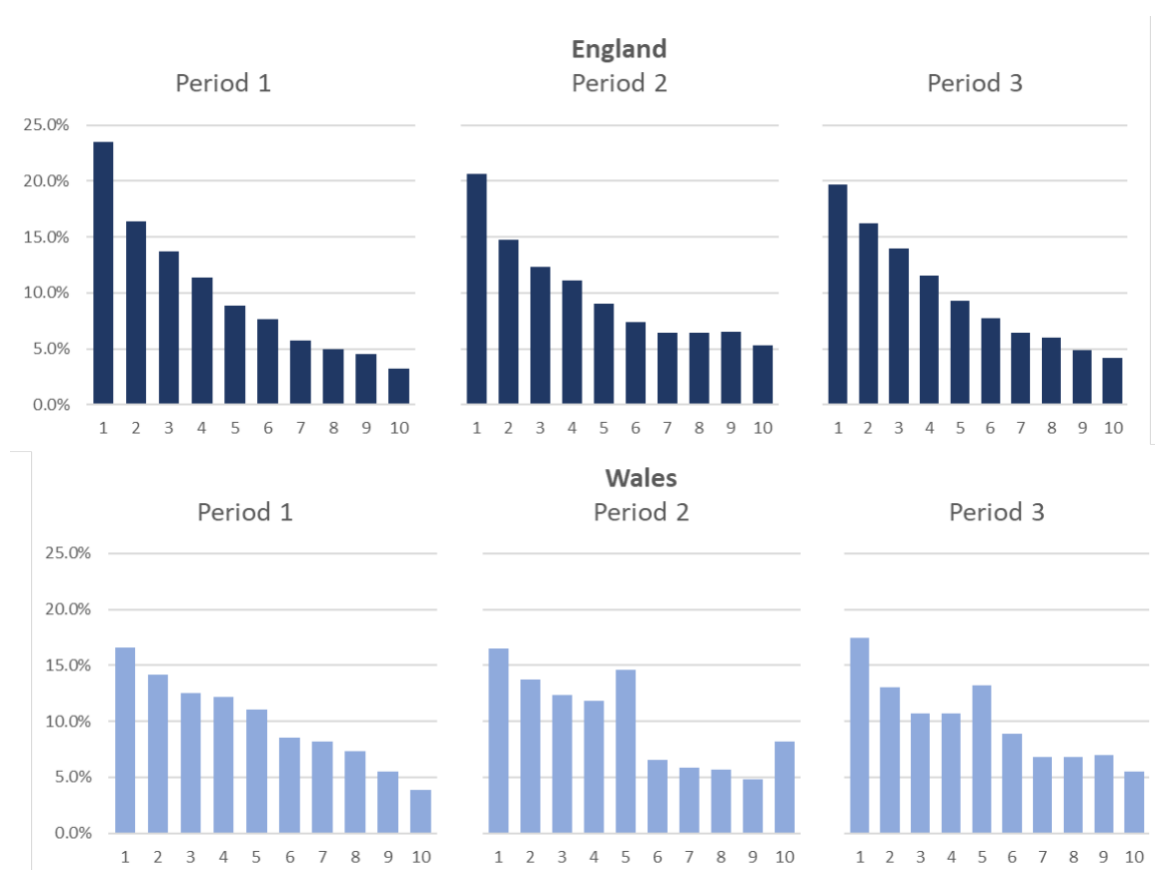
The equivalent data for Wales, also shown in Figure 5, shows a similar pattern; however, the degree of disparity is smaller. Just under one in five (17.0%) FPN recipients in Wales were living in one of the 10% most deprived LSOAs in Wales or England, whereas 5.6% were living in one of the 10% least deprived LSOAs. This represents a disparity of 3.0 between those living in the most and least deprived areas of either England or Wales.



**Figure 5. Percentage of people who received an FPN by IMD or WIMD decile, 27 March 2020 to 31 May 2021, England and Wales**

Like the Scottish research, there was some change over time in the deprivation profile of people issued with FPNs in England and Wales, although it was not as extreme as the changes observed in Scotland. Figure 6 shows that the social gradient of FPN recipients in England remained very similar across all three periods, although the disparity between those living in the most and least deprived LSOAs did decrease from 7.2 in period one to 3.9 in period two, before increasing again to 4.7 in period three. This suggests less inequality of enforcement between people living in high and low deprivation areas during periods two and three, compared to the first lockdown.

For people issued with FPNs in Wales, the social gradient changed more distinctively over time, with some levelling off at both the top and bottom ends of the deprivation spectrum during periods two and three. The disparity between those living in the top and bottom deprivation deciles was lower than for England across all three periods, ranging from 4.3 in period one, to 2.0 in period two, and 3.2 in period three. However, the overall pattern of change was the same. For further information on the deprivation data, see Annexes 2 and 5.



**Figure 6. Percentage of people who received an FPN in England and Wales by IMD or WIMD decile by period, 27 March 2020 to 31 May 2021**

While these results provide some indicative evidence of disproportionality in the extent to which people issued with FPNs for breaching the Coronavirus Regulations were living in more deprived areas, it is not possible say anything about the socio-economic circumstances of individual FPN recipients (e.g., whether they were on low incomes, living in poor housing conditions, or were experiencing poverty). Nor is it possible to conclude that policing practices were biased, disproportionate, or targeted at people living in poor areas.

To understand more about these patterns of area deprivation would require detailed information about the nature and extent of breaches within areas across England and Wales. It is interesting that the results are broadly in keeping with the Scottish data, which suggests that the reasons for this pattern are likely to be more general rather than restricted to specific jurisdictions. Gorton et al. (2022)<sup>32</sup> concluded that the reduction in disparity over time between those living in the top and bottom deprivation deciles in Scotland may well be due to increasing levels of non-compliance across the whole population. It is plausible that this was also the case in England and Wales, which meant that police officers were increasingly dealing with a wider cross-section of society.

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<sup>32</sup> Gorton et al (2022) [Police Use of Covid-19 Fixed Penalty Notices in Scotland](#)

## 5. Police Force Area profile of FPNs

### 5.1. Overview of variation between Police Forces Areas (PFA)

This section examines differences in the use of FPNs at a PFA level. For the most part, the analysis is based on the number of FPNs issued rather than the number of people to whom FPNs were issued; however, analysis of variation in ethnic disparity is based on individuals rather than fines. As noted earlier, comparisons between PFAs need to be made with caution, given significant differences in population size and structure, geography, and policing demands. Nevertheless, it is important to establish where, and how, policing practices differed across England and Wales, and whether there may be plausible explanations for such variation.

The total number and rates of FPNs issued at PFA level varied widely (see Table A1 in Annex 5). Based on resident population within each PFA,<sup>33</sup> Figure 7 shows the rate of FPNs issued per 10,000 people across the 43 force areas.

The average rate of FPNs issued across English police forces was 20.0 per 10,000 people.<sup>34</sup> PFAs with the highest rates included North Yorkshire (49.4), Merseyside (47.9) and Northumbria (45.2), all of which were more than double the average for English forces. This contrasted with rates in Humberside (7.1), West Midlands (7.8), Essex (8.3), Hertfordshire (9.8) and Cleveland (9.9) which were all well below average.

In Wales, the average rate of FPNs issued across police forces was almost twice that for England, at 38.6 per 10,000 people.<sup>35</sup> Rates were lowest in Gwent (21.4), which was still above the average for the English forces, and highest in North Wales (45.2). The difference from average in the rates for Dyfed-Powys and North Wales was not statistically significant.

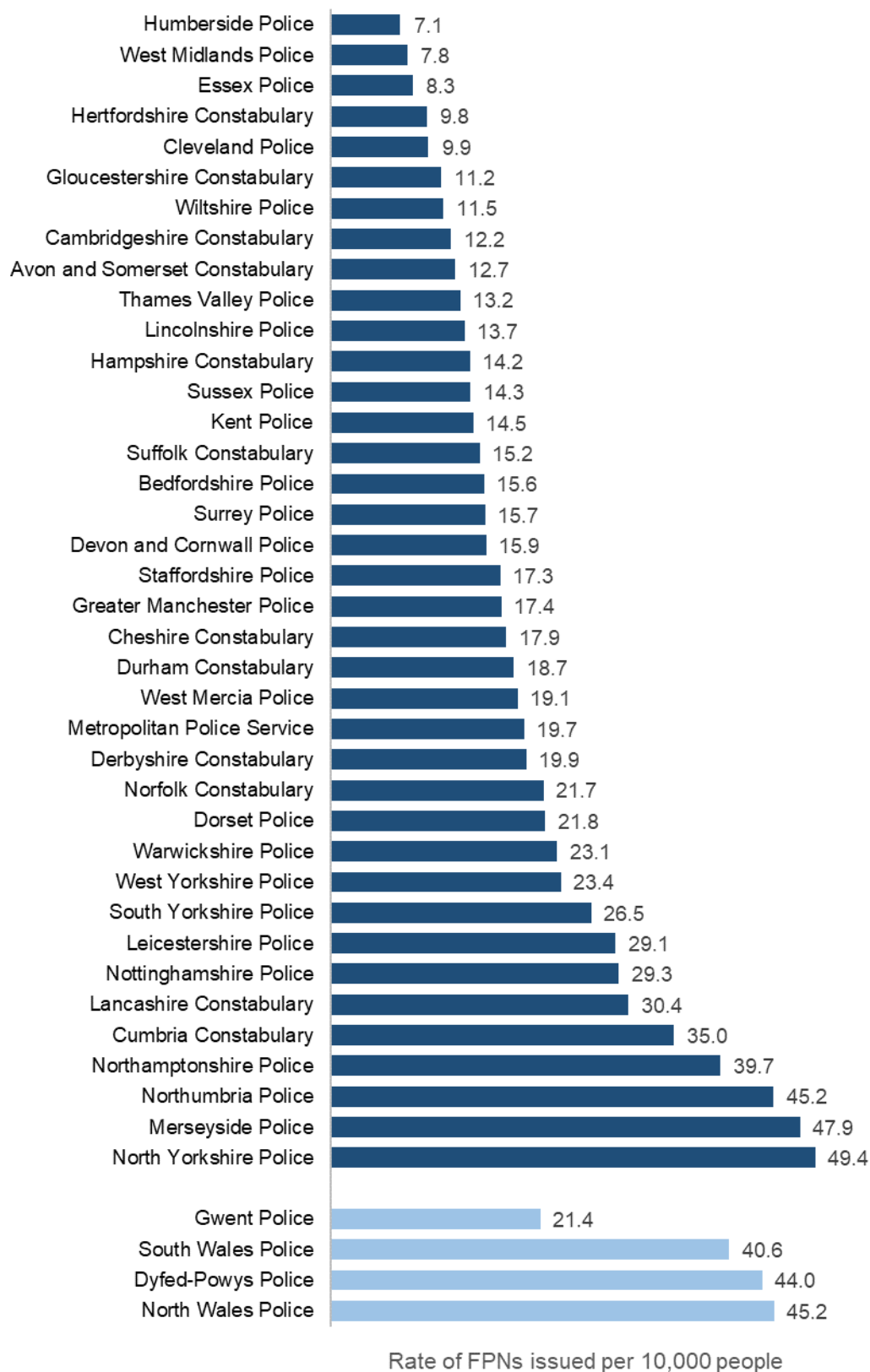
To provide geographical context, Figure 8 maps the distribution of FPN rates across the 43 police force areas in England and Wales. There is clear spatial clustering, with rates being noticeably higher in Wales, Northern England, and the Midlands, and lowest in the South and East of England. For further reference, a labelled map of the individual police force areas can be found in Annex 6.

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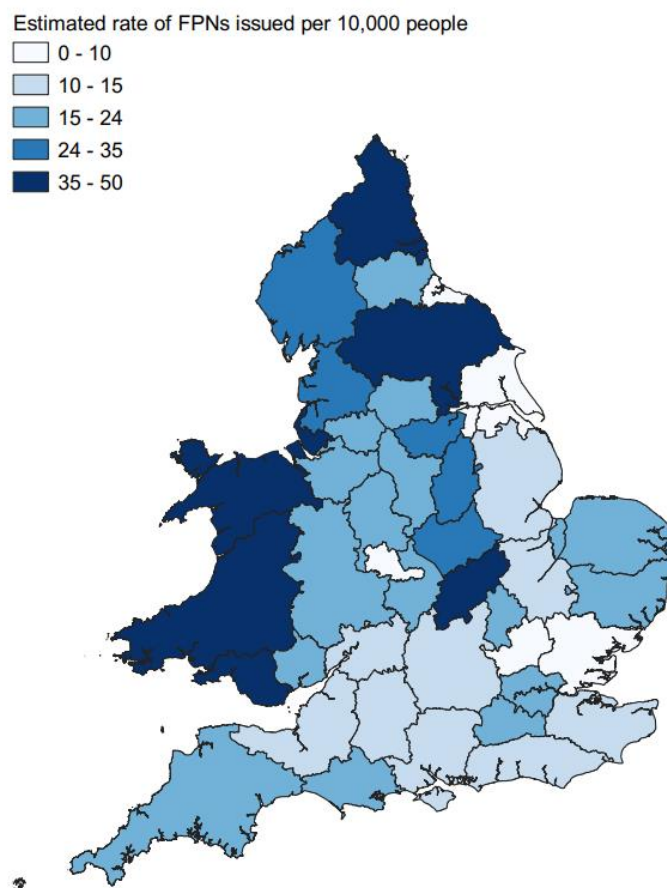
<sup>33</sup> Population rates in this section of the report are based on ONS 2016 Mid-Year Population Estimates. See section 1.6 and Annex 2.

<sup>34</sup> Note that the average rate for English police forces is different to the total rate for England, presented in section 2.1, due to the use of different population data and because data for the City of London is excluded.

<sup>35</sup> Note that the average rate for Welsh police forces is different to the total rate for Wales, presented in section 2.1, due to the use of different population data.



**Figure 7. Rate of FPNs issued per 10,000 population by issuing Police Force Area, 27 March 2020 to 31 May 2021, England and Wales**

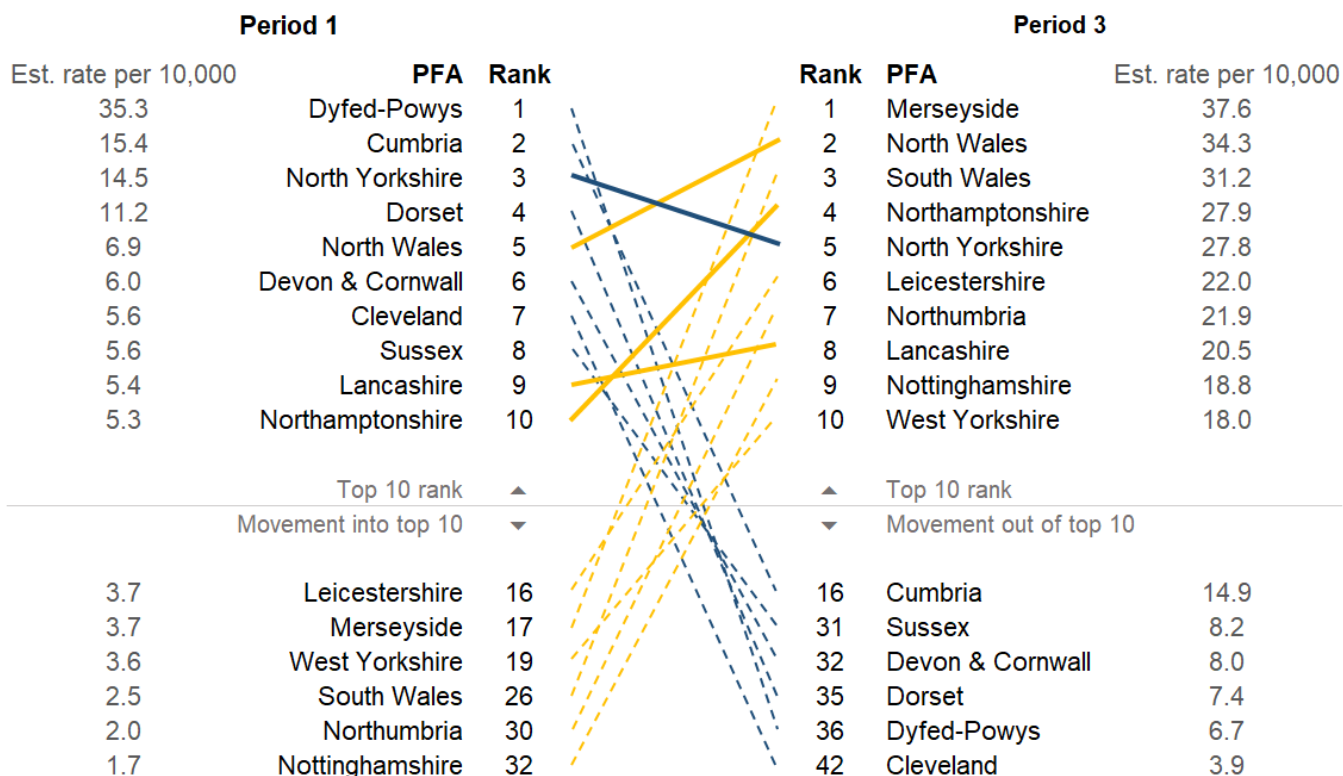


**Figure 8. Estimated rate of FPNs issued by Police Force Area, 27 March 2020 to 31 May 2021, England and Wales**

## 5.2. Police force area and change over time

Rates also varied considerably over the three periods (see Table A2 in Annex 5). Of the ten PFAs with the highest FPN rates per 10,000 residents in period one, only four were still in the top ten by period three (North Yorkshire, North Wales, Lancashire, and Northamptonshire). The remaining six PFAs had moved down considerably in the rankings, especially Cleveland which moved from 7th to 42nd.

Change in the relative ranking of PFAs by estimated FPN rates per 10,000 residents between periods one and three is illustrated in Figure 9. The yellow dotted lines indicate an increase (towards 1) in the relative position between periods one and three, while the blue dotted lines indicate a fall (towards 43) in relative position. The lines in bold highlight the four forces that remained within the highest ten ranking forces during both periods. Please note that, as discussed in Annex 2, population rates are subject to some uncertainty, and patterns of enforcement are likely to be influenced by a wide range of factors, so rankings should be interpreted with a degree of caution.

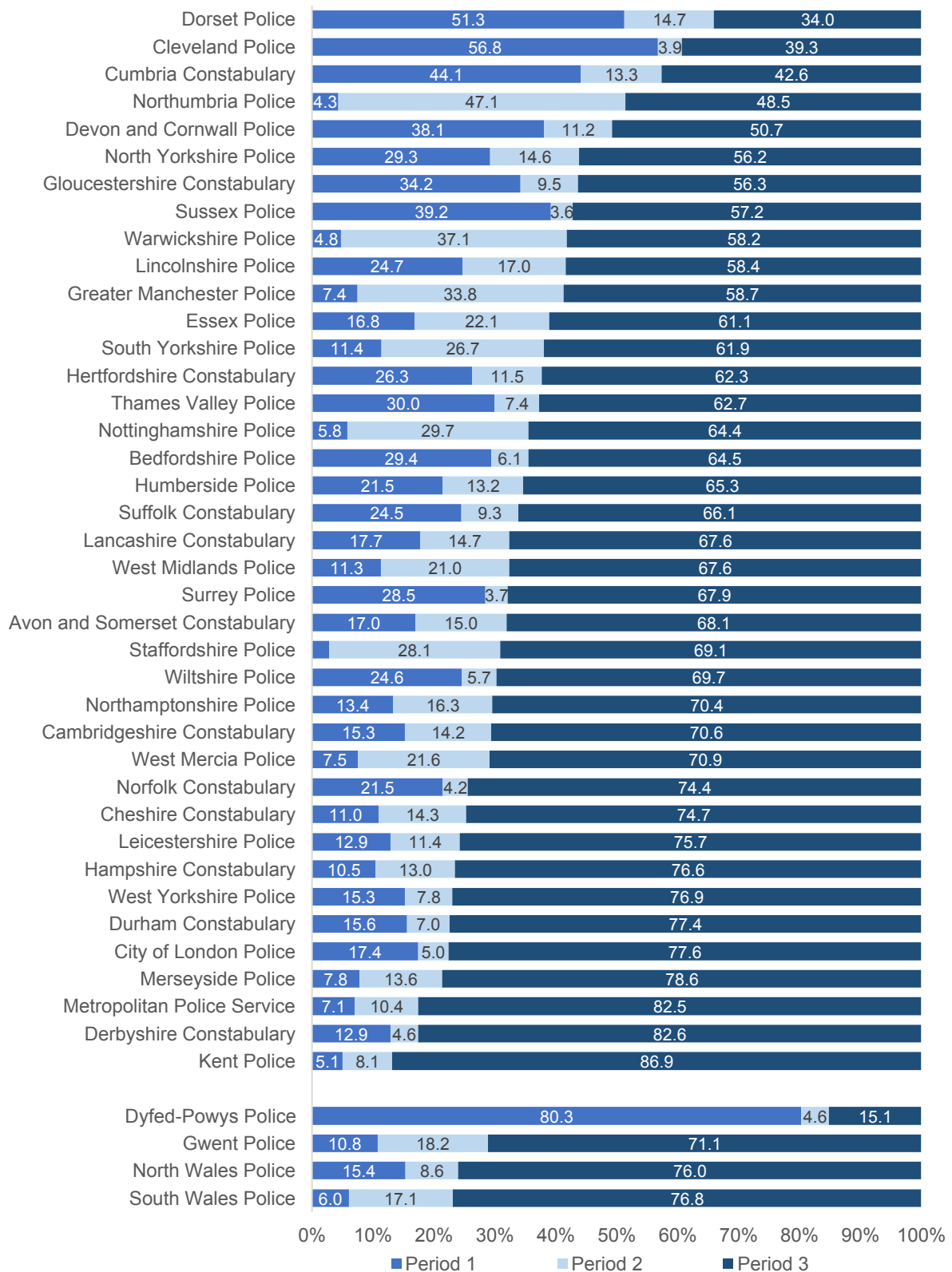


**Figure 9. Change between periods one and three in the rank of Police Force Areas by rate of FPNs issued per 10,000 resident population**

Several of the highest-ranking police forces during period one contain areas of outstanding natural beauty and national parks (for example, Cumbria, North Wales, Devon and Cornwall, Dyfed-Powys, and North Yorkshire). In period three, the highest-ranking police forces also included several covering large urban centres (such as Merseyside, Nottinghamshire, and parts of West Yorkshire), as well as more rural PFAs.

Overall, the analysis highlights a relative shift from ‘rural’ to ‘urban’ policing as the pandemic wore on. This can be further observed in Figure 10, which shows the relative proportion of FPNs issued by each PFA in the three periods. While most PFAs issued the majority of FPNs during period three, it shows that some forces were more active in enforcement during the first and second periods, including Dorset, Cleveland, and Cumbria. At the other end of the spectrum, forces such as Kent, Derbyshire, the Metropolitan Police Service, and Merseyside used relatively more enforcement during the third period. Interestingly, in Wales, the pattern of enforcement in Dyfed-Powys contrasts starkly with that of the other three Welsh forces and suggests that there was comparatively more demand for policing during the first period than the third.





**Figure 10. Percentage of all FPNs issued by Police Force Areas across the three periods, 27 March 2020 to 31 May 2021, England and Wales**

### 5.3. FPNs issued to non-residents

As noted in Part 2.2, over a quarter of all FPNs issued in England, and almost half of those issued in Wales, were in respect of illegal movement or travel. It is therefore important to take account of the number of non-residents subject to enforcement under these Regulations when examining policing activity at a PFA level.

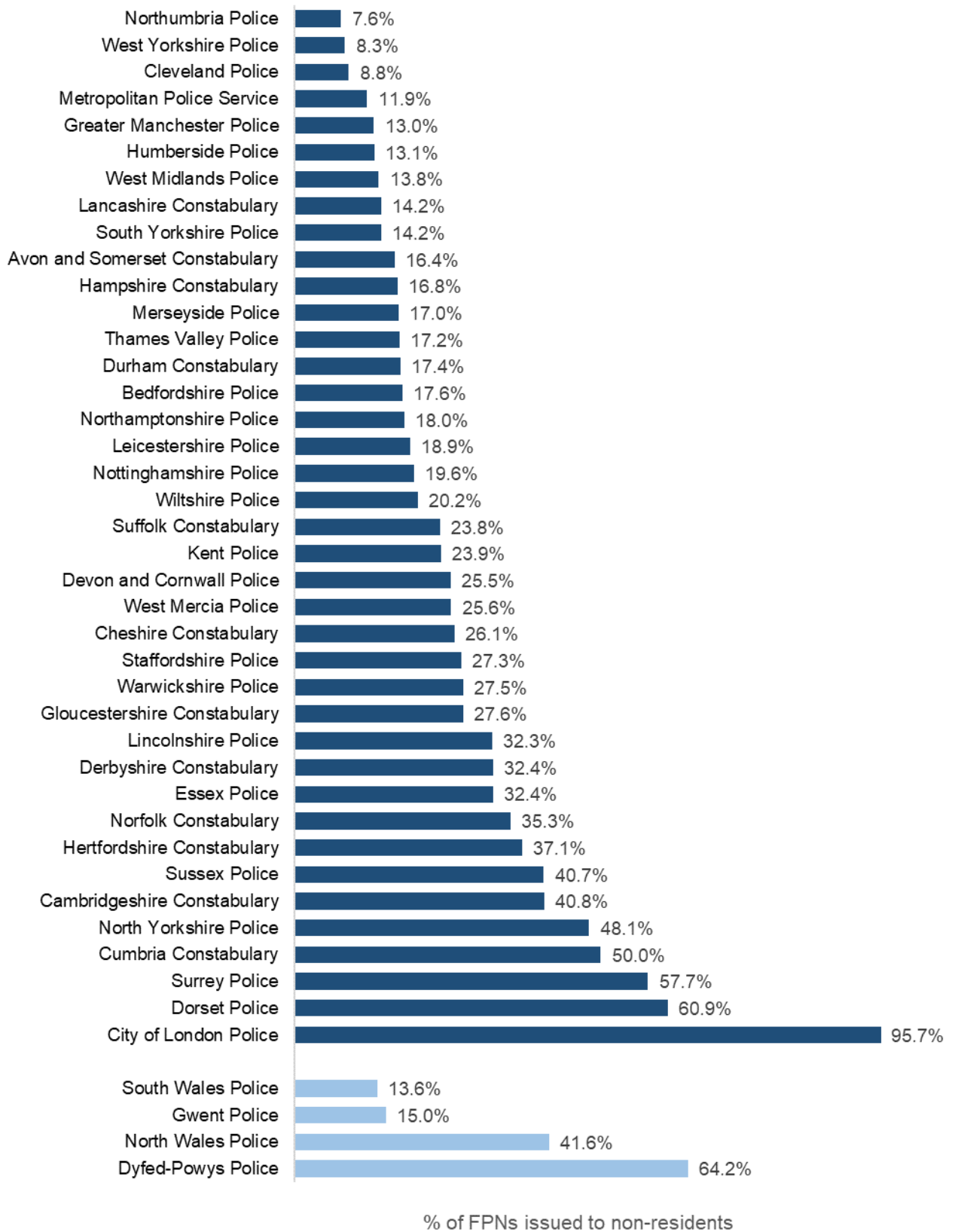
Just over one in five (22.0%, n=26,385) FPNs issued between March 2020 and May 2021 were issued in PFAs where the recipient did not permanently reside. As expected, based on the reasons for issue, this figure was considerably higher in Wales (30.5%) than in England (21.1%). Again, however, there was considerable variation by PFA.

Figure 11 shows that the vast majority (95.7%) of FPNs issued by the City of London police were given to non-residents, which is not surprising given that the force covers a very small central area of London with a low resident population. The next nearest forces were Dyfed-Powys, Dorset, Surrey, and Cumbria, which issued at least half of all their FPNs to people not resident in these areas. At the other end of the spectrum, Northumbria, West Yorkshire, and Cleveland police forces issued less than 10% of all FPNs to non-residents.

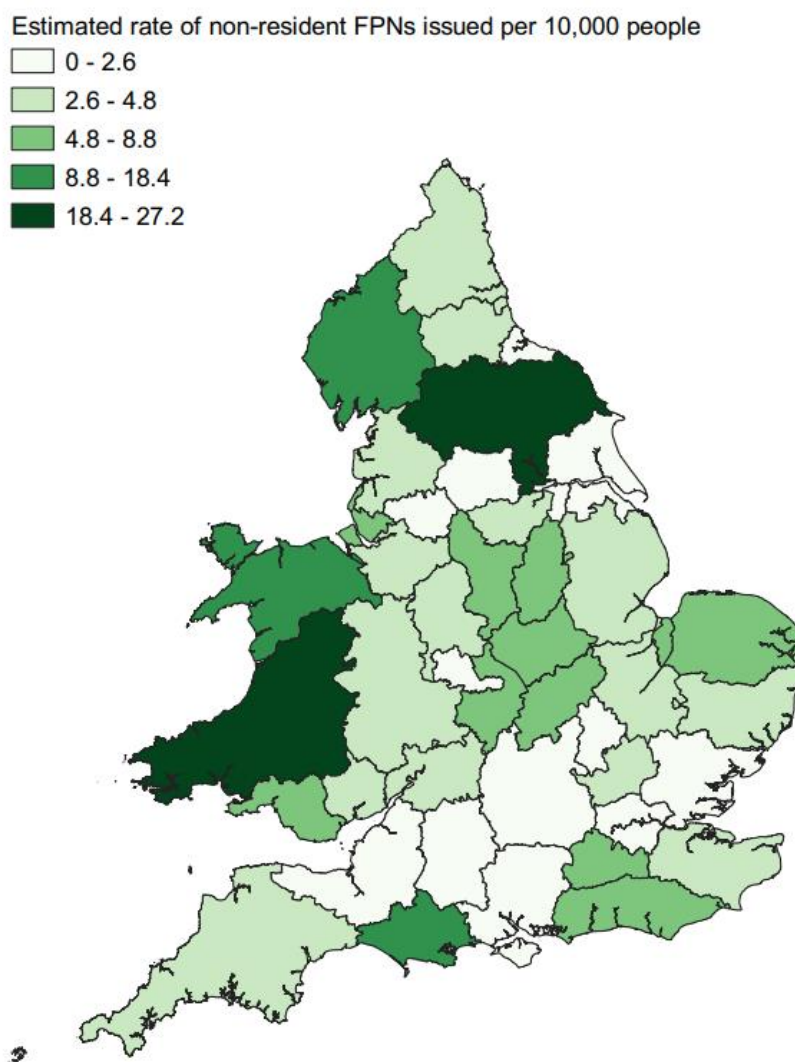
Except for the City of London, the police forces issuing the highest proportion of FPNs to non-residents tended to include some of the more remote, rural and/or coastal parts of England and Wales. This indicates that the level of policing demand in these areas was driven, to a large extent, by illegal travel into these areas, and helps to explain the higher than average rate of enforcement in some of these PFAs (such as North Yorkshire and Cumbria).

Nevertheless, some PFAs that issued a higher-than-average rate of FPNs overall, issued a lower-than-average proportion of FPNs to non-residents. For example, Northumbria issued 45.2 FPNs per 10,000 people, which was more than double the national average rate; but issued the lowest percentage of FPNs to non-residents. Similarly, Merseyside, Northamptonshire and Lancashire forces had higher than average enforcement rates but issued a lower than average proportion of FPNs to non-residents. This indicates that local factors other than illegal travel were responsible for driving up enforcement in some PFAs.

The degree of variation across PFAs in the rate of FPNs issued to non-residents is visually mapped in Figure 12. This shows far higher rates of enforcement in relation to travel into Dyfed-Powys and North Yorkshire, as well as North Wales, Cumbria, and Dorset. For reference, Annex 6 provides a labelled map of the PFAs in England and Wales.



**Figure 11. Percentage of FPNs issued to non-residents, by issuing PFA, 27 March 2020 to 31 May 2021, England and Wales**



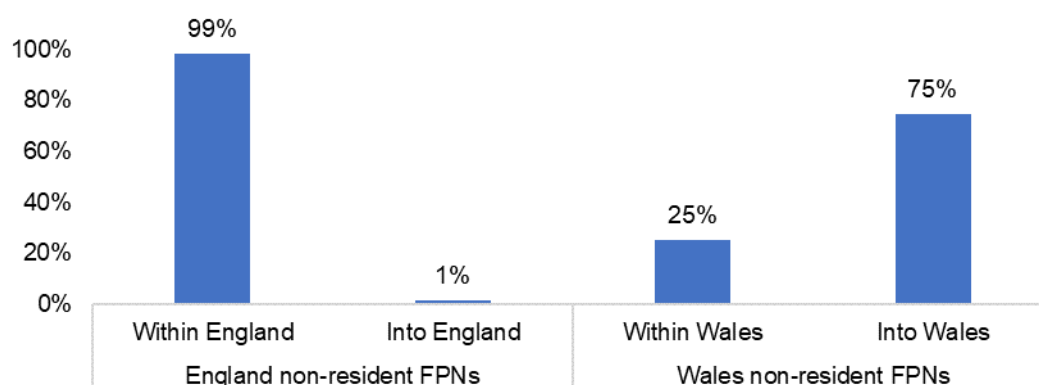
**Figure 12. Rate of FPNs issued to non-residents by Police Force Area, 27 March 2020 to 31 May 2021, England and Wales**

#### 5.4. Non-resident travel movements

Given differences in the percentage of tickets issued to non-residents by police forces in England and Wales, this section looks in more detail at the extent of travel *within* and *between* the two countries that accounted for non-resident FPNs.

The majority (88.6%) of all non-resident FPNs were issued for travel within the country of residence, while the remaining 11.4% were issued following travel across the English-Welsh border. However, cross-border travel made up a considerably larger proportion of non-resident FPNs issued by Welsh police forces. Figure 13 shows that 75% of non-resident fines issued by Welsh police forces were given to individuals that were resident in England but had travelled to Wales. This compares

to only 1% of non-resident fines that were issued in England to people who had travelled from Wales.



**Figure 13. Percentage of FPNs issued for cross-border travel by type within country, 27 March 2020 to 31 May 2021, England and Wales**

Note: Percentages are calculated within country of issue

Seven PFAs are located along the English-Welsh border,<sup>36</sup> which means that cross-border travel can involve relatively small distances to neighbouring police divisions. Table 13 shows that just over half (56.1%) of non-resident FPNs issued by English police forces involved travel across neighbouring police divisions; however, this was the case for only around a third (38.1%) of non-resident FPNs issued by Welsh police forces. Overall, this suggests that Welsh forces were dealing with different (and potentially more serious) travel-related breaches than English forces.

**Table 13. Percentage of non-resident FPNs issued by travel type, 27 March 2020 to 31 May 2021, England and Wales**

Type of non-resident travel	Percent of all non-resident tickets	Percentage of non-resident FPNs issued by English PFAs	Percentage of non-resident FPNs issued by Welsh PFAs
Travel to a neighbouring PFA	54.1%	56.1%	38.1%
Travel to a non-neighbouring PFA	45.8%	43.9%	61.9%
Total non-resident tickets	26,320	22,733	3,587

Note: There were 65 FPNs issued to non-residents for which data on travel could not be ascertained.

<sup>36</sup> For the purposes of this analysis, Avon and Somerset PFA have been classified as being on the English-Welsh border due to the connection via the road bridges across the Severn Estuary.

## 5.5. Variation in ethnic disparity between Police Force Areas

To estimate ethnic disparities, the analysis in this section uses data on the number of FPN recipients from white (including white minorities) and ethnic minority (excluding white minorities) backgrounds in each PFA. Due to the very small number of people in specific ethnic groups within some PFAs, the analysis is restricted to comparing people from all ethnic minority groups with white people (including white minorities). Population rates were calculated using 2016 ONS data;<sup>37</sup> however, this is somewhat out of date and data were aggregated to the nearest thousand, which means there is likely to be some degree of error in the rates. Differences between PFAs should, therefore, be interpreted with caution.

Of all those issued with an FPN in England and Wales whose ethnic group was known, a quarter (25.4%) were from an ethnic minority background.<sup>38</sup> The equivalent population figures for England and Wales are 27.0% and 10.7%, respectively.

The analysis in this section focuses on the degree of disparity in the rate of FPNs issued to people from ethnic minority backgrounds, compared to the rate issued to white people within each PFA.<sup>39</sup> Given the high degree of travel across PFA boundaries, the analysis also examines the degree of ethnic disparity in FPNs issued to residents only. Figure 14 shows the disparity in rates across PFAs, ordered from largest to smallest for *all* FPN recipients (on the left) and the disparity in rates when taking account only of those who were resident within that PFA (on the right).

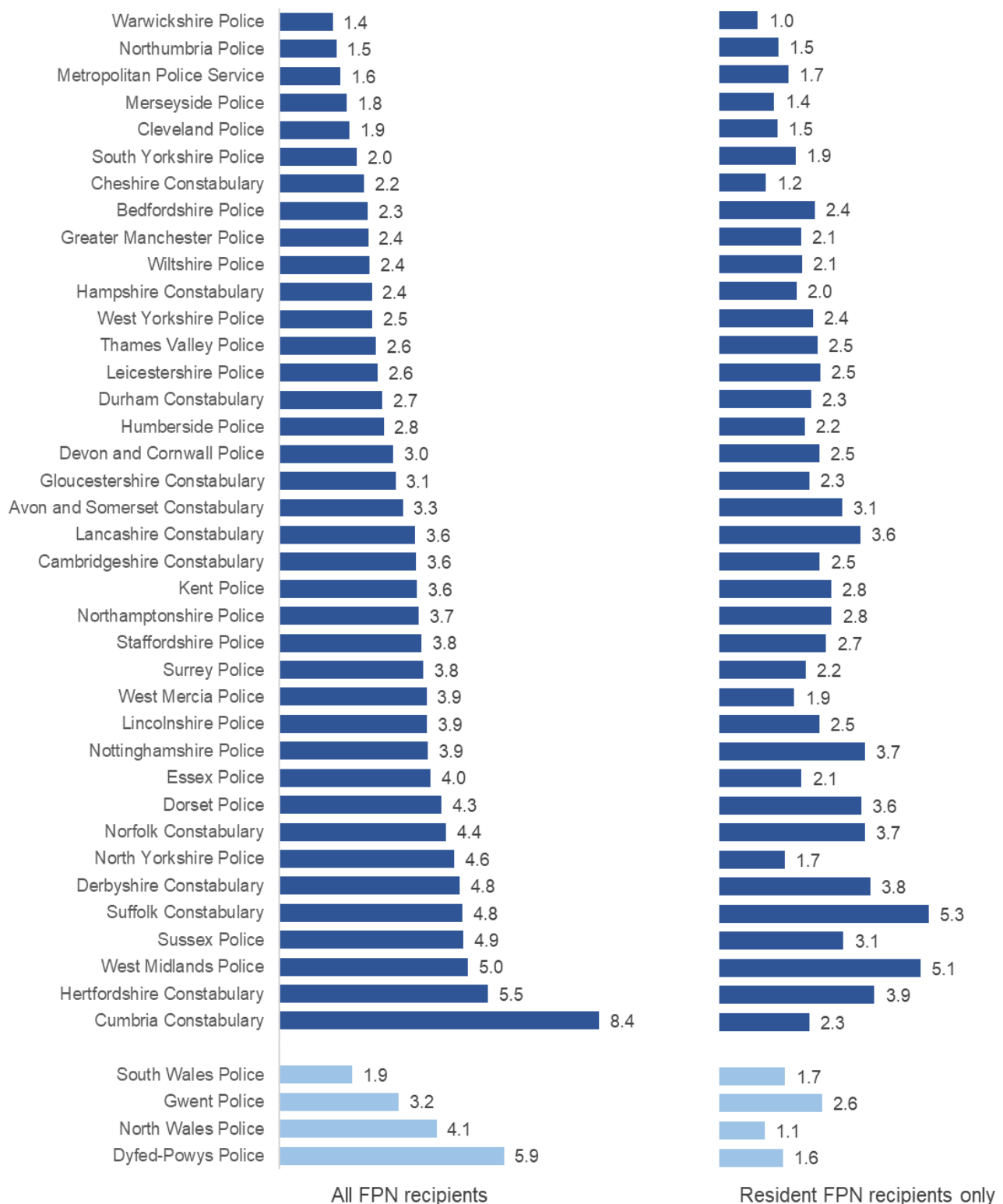
Looking first at the ethnic disparity rates for all FPN recipients, the values for all PFAs are greater than 1 which indicates that a higher rate of people from ethnic minority backgrounds than white people were issued FPNs in all police force areas within England and Wales. The average for England was 2.1, and the average for Wales was 2.7. This suggests that some degree of ethnic disproportionality in enforcement was evident across all PFAs in England and Wales during the pandemic.

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<sup>37</sup> Note that the disparity rates for PFAs were calculated using a different population denominator to those presented in Section 4, so they are not directly comparable (see section 1.6 and Annex 2).

<sup>38</sup> Information about the ethnic background of 1,355 individuals was not recorded.

<sup>39</sup> As the analysis is based on individuals, it reduces any bias that might have been caused by the same person being fined multiple times within each PFA. Disparity rates are calculated by dividing the rate of issue for ethnic minority individuals by the rate of issue for white people.



**Figure 14. Disparity in rate of ethnic minorities issued with an FPN (compared to white) by Police Force Area, for all FPN recipients and resident FPN recipients only, 27 March 2020 to 31 May 2021, England and Wales**

Some PFAs were well above average in terms of ethnic disparity. Cumbria had the highest disparity rate, with a rate of issue for people from ethnic minority backgrounds that was 8.4 times higher than the rate for people from white backgrounds. This was something of an outlier as the next nearest disparity rate in England was 5.5 for Hertfordshire. At the lower end of the spectrum, Warwickshire, Northumbria, the Metropolitan Police Service, Merseyside, Cleveland, and South Yorkshire police forces all had disparity rates well below the average for England. In Wales disparity rates were highest for Dyfed-Powys and lowest for South Wales, with substantial variation across the four Welsh forces.

Looking next at only those FPN recipients who were resident within the PFA in which the fine was issued, the ethnic disparity rate was much narrower in many PFAs. In Cumbria, for example, where the overall ethnic disparity rate was highest, this reduced to just 2.3 when taking account of residents only. There were also sizeable reductions in the disparity rate in Hertfordshire, Sussex, North Yorkshire, Essex, and West Mercia, amongst others. The reduction in disparity rates is particularly evident in Wales, especially in North Wales and Dyfed-Powys. Indeed, there was almost no disparity in the rate of issue of FPNs to people from ethnic minority backgrounds compared to white people in North Wales when looking at residents within that PFA only. Nevertheless, some PFAs saw little or no reduction in the ethnic disparity rate when taking account of residents only, while a few saw a slight increase.

The results presented in Figure 14 suggest that, within some PFAs, enforcement amongst those who were not normally resident in that area may have disproportionately involved people from ethnic minority backgrounds. It is not however, possible from these data to determine whether those from minority ethnic backgrounds were more likely than those from white backgrounds to be involved in illegal travel, or whether those from minority ethnic backgrounds were more likely than white people to be subject to policing due to illegal travel, during the pandemic.

Figure 14 should not be interpreted as a 'league table' of PFAs based on the ethnic disparity rates. Differences between many PFAs may not be statistically significant and, as noted earlier, the age and level of aggregation for ethnicity data mean that there is an unknown degree of uncertainty around these disparity rates. The limitations of this analysis are discussed further in the Annex 2.



## 6. Profile of repeat FPN recipients

### 6.1. Issue of repeat FPNs

This part of the report provides an overview of individuals who received multiple FPNs under the Regulations. As noted in part one, it was permissible across all countries to issue multiple fines and double the size of the fine each time, to a specified maximum value, which varied by country and over time. In England, the upper limit for fines in England increased from £960 to £3,200 in May 2020, and again, to £6,400.<sup>40</sup> In Wales, the maximum fine value increased from £120 to £1,960 in May 2020.<sup>41</sup>

The incremental fine structure introduced by the Regulations was very different to the normal system for issuing fines for motoring offences or public disorder, which remain at the same level no matter how many are issued to individuals. It meant that people who were in breach of the Regulations on more than one occasion could potentially face heavy financial penalties. Analysis conducted in Scotland suggested that repeat FPN recipients were likely to be older on average, to be living in more deprived areas, and to have a prior criminal history, but did not find any relationship in terms of sex or ethnicity.<sup>42</sup>

### 6.2. Number and rate of repeat FPN recipients

Overall, out of 116,107 individual FPN recipients in England and Wales, 5,111 (or 4.4%) were fined on more than one occasion. The vast majority (83.7%) of repeat FPN recipients were fined twice; however, just over one in ten (11.3%) were fined three times and one in twenty (5.0%) were fined on four or more occasions. The largest number of fines recorded for one individual was twelve; however, it is unlikely that these were all payable tickets as rates of fine cancellation were higher amongst repeat FPN recipients (see Part Seven).

People who were fined in England were slightly (although significantly) more likely to receive two or more FPNs than those who were fined in Wales (4.5% versus 3.7%, respectively). Note that no individual was fined in both England and Wales.

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<sup>40</sup> Crown Prosecution Service (updated 2022) [Coronavirus: Health Protection \(Coronavirus, Restrictions\) \(No.2\) \(England\) Regulations 2020](#)

<sup>41</sup> Welsh Government (20 May 2020) [Fines increased for repeat coronavirus lockdown breaches in Wales](#)

<sup>42</sup> See McVie (2021) [Second data report on Police Use of Fixed Penalty Notices under the Coronavirus Regulations in Scotland](#)

### 6.3. Value of fines issued to FPN recipients

As noted in Part One, the value of fines issued under the Coronavirus Regulations varied depending on the country of issue, the period of time during which people were fined, and the number of FPNs received. Overall, the majority of people received a fine of £100 (38.8%) or £200 (32.5%). However, some people received much higher fines and, for those who were fined multiple times, the costs could run into many thousands of pounds.

For people fined in England, the median fine amount for single FPN recipients was £100; whereas, for repeat FPN recipients, the median amount was £500.<sup>43</sup> For individuals fined in Wales, the median fine amount for single recipients was much lower at £30; while the median amount for repeat recipients was £180.

The lower fine value in Wales may have had some impact on the higher rate at which FPNs were issued. For example, it may have contributed to a higher prevalence of breaching the Regulations (if people felt it was worth it for the small fine amount); or it may have influenced police use of FPNs (if officers were more willing to use fines of a lower value). However, it is not possible to draw conclusions on this from the analysis presented here.

### 6.4. Repeat FPN recipients and change over time

In England, the issuing of repeat FPNs was most common during period one. Table 14 shows that 7.8% of people who received an FPN during this period were fined at least twice. This reduced to 6.3% by period two, and again to 5.0% during period three.

In Wales, 6.8% of those who breached the Regulations during period two were repeat FPN recipients, compared to around 4% of those fined during the other two periods. The differences between England and Wales are significant in periods one and three, but not in period two.

**Table 14. Percentage of single and repeat FPN recipients by period, 27 March 2020 to 31 May 2021, England and Wales**

	England		Wales	
	Single	Repeat	Single	Repeat
Period 1	92.2%	7.8%	96.1%	3.9%
Period 2	93.7%	6.3%	93.2%	6.8%
Period 3	95.0%	5.0%	95.7%	4.3%

<sup>43</sup> Medians are reported rather than means due to the degree of skew in the total amount of fines. Total fine values reflect the sum of all fines issued per individual.

## 6.5. Profile of repeat FPN recipients

Table 15 provides an overview of the demographic profile of single and repeat FPN recipients for England and Wales. Those who received FPNs were predominantly male; however, repeat FPN recipients in England were even more likely to be male than single FPN recipients. As noted in part three, a lower proportion of FPN recipients in Wales were male compared to England; however, there was no sex difference in the profile of single and repeat FPN recipients in Wales.

There was no difference in the median age of repeat or single FPN recipients in England; however, repeat FPN recipients in Wales were, on average, three years younger than single FPN recipients. Repeat FPN recipients were significantly less likely to be from an ethnic minority background in both England and Wales.

The most significant difference between single and repeat FPN recipients in England and, to a lesser extent, Wales, was the percentage of people living in one of the 10% most deprived LSOAs. Repeat FPN recipients in England were three times more likely than the population average to be living in the top 10% of deprived areas, while single FPN recipients were twice as likely. In Wales, these differences were smaller but still statistically significant.

**Table 15. Percentage of single and repeat FPN recipients by demographic characteristics, 27 March 2020 to 31 May 2021, England and Wales**

	England		Wales	
	Single	Repeat	Single	Repeat
% male	70.2%	77.4%	66.1%	65.2%
Median age	25	25	26	23
% ethnic minority	27.1%	24.8%	10.9%	7.1%
% living in the 10% most deprived LSOA	19.6%	31.9%	18.1%	23.2%

These findings suggest that socio-economic circumstances may have been a contributory factor for repeated breaches of the Regulations and/or patterns of enforcement. As noted above, this will have had a disproportionate financial impact on these individuals due to the much larger subsequent fines that they incurred in Wales and, especially, England.

## 7. Outcomes of FPNs

### 7.1. Possible outcomes

The data provided by ACRO included details of three possible outcomes for FPNs issued under the Coronavirus Regulations: payment; cancellation or withdrawal; and 'non-compliant'. Fines marked as 'non-compliant' were not paid within the statutory payment period, but were also not cancelled or withdrawn, and so would have been referred to the Courts for consideration. There is no further information on the longer-term outcome of these fines (e.g. in terms of whether they were ever paid, resulted in a court appearance, or were later rescinded), and as such are not included in the analysis. Instead, this part of the report provides further analysis of cancelled or withdrawn fines, and paid fines.

### 7.2. Cancelled or withdrawn FPNs

The Coronavirus Regulations did not provide a process for reviewing or appealing FPNs at the request of the recipient. As the Joint Committee on Human Rights noted, *'for most people, the main way of arguing that an FPN was wrongly issued is to be prosecuted in court for that offence and to mount a defence during that criminal prosecution'* (2021: para. 76).<sup>44</sup> Nevertheless, review processes were in place which led to some fines being rejected by ACRO or cancelled by individual police forces. In the majority of cases, the cancellation or withdrawal of fines was due to: lack of, or incorrect, information provided on the actual ticket; lack of sufficient evidence that an offence had been committed; or failure of officers to follow the 4Es.<sup>45</sup>

Analysis was conducted to determine whether cancelled or withdrawn FPNs (hereafter referred to as 'cancelled') were different from other FPNs based on where, when, why, and to whom they were issued. Information on cancelled FPNs is not routinely published, so it is not possible to say whether the results presented in this report are different to what might normally be expected. It is plausible that rapid and frequent changes to the Regulations and restrictions during the pandemic may have resulted in greater potential for errors of judgement and good faith mistakes while implementing the new policing powers. However, more information on the internal

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<sup>44</sup> House of Commons and House of Lords Joint Committee on Human Rights (2021) [The Government response to covid-19: fixed penalty notices](#).

<sup>45</sup> Based on police force responses to a formal request for information by the NPCC.

review process and the role of informal interventions by legal professionals<sup>46</sup> would be required to better understand the pattern of cancelled FPNs discussed below.<sup>47</sup>

### 7.2.1. Cancellation by police force area

A total of 6,423 FPNs in England and Wales were cancelled, representing 5.2% of all fines issued. Overall, FPNs were more likely to be cancelled within police forces in England (5.5%) than in Wales (3.0%), but there was considerable variation across PFAs in both countries.

Figure 15 shows that, in England, the percentage of FPNs cancelled was lowest in Warwickshire (1.1%) and highest in the West Midlands (23.5%). West Midlands was a substantial outlier compared to other PFAs, which means that more than half of all forces sit below the average for England and Wales (5.2%). In Wales, the prevalence of cancellation ranged from 1.5% in Gwent, to 5.2% in Dyfed-Powys. Note that cancellation was not strongly associated with the total number of FPNs issued, nor population size within PFAs. Moreover, there was very little change in the ordering of PFAs by rate of FPNs issued (shown in Figure 7) when taking cancelled fines into account.

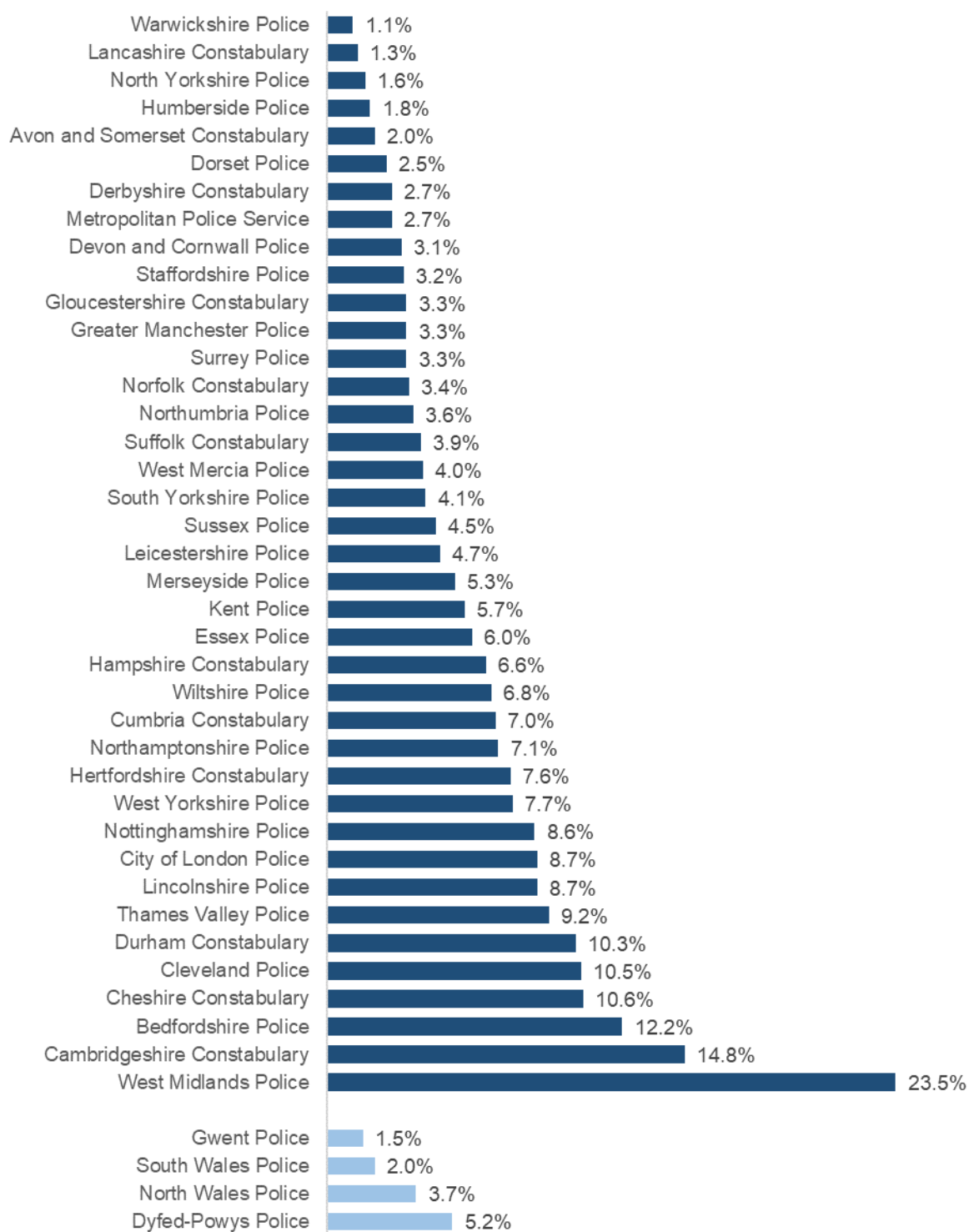
It is notable that a fifth (20.9%) of all FPNs issued to individuals who were not resident within the issuing PFA were cancelled, compared to only 1.4% of FPNs issued to residents. This could be because decisions were taken to issue FPNs in relation to people travelling outside the recommended distance from their home address (e.g., to take exercise), especially during the first lockdown period, in circumstances that were later concluded to have been errors of judgement.

West Midlands issued a higher than average proportion of FPNs to non-residents (43.9% compared to a mean of 32.3%); however, this does not fully explain the distribution of cancellation shown in Figure 15, as Dorset and North Wales issued a far higher proportion of FPNs to non-residents, but were amongst the lowest in terms of their cancellation rates. It is likely that other local factors explain the differences observed across PFAs.

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<sup>46</sup> The House of Commons and House of Lords Joint Committee on Human Rights heard evidence of informal approaches by lawyers leading to police forces dropping FPNs in some instances. See [paragraph 79](#).

<sup>47</sup> The House of Commons and House of Lords Joint Committee on Human Rights stated: '*Whilst the police told us that there is some form of internal review that takes place before the fine is issued, this process is not clear or transparent, and incorrect penalty notices get through*'. (2021: page 3).



Percentage of FPNs cancelled or withdrawn

**Figure 15. Percentage of FPNs cancelled by Police Force Area, 27 March 2020 to 31 May 2021, England and Wales**

### 7.2.2. Change in FPN cancellation over time

Table 16 shows the percentage of FPNs cancelled in England and Wales during each of the three periods of the pandemic. In England, cancellation was higher in periods one and two, compared to period three; while, in Wales, it was higher in period one, compared to periods two and three. Again, this suggests differences in terms of either behavioural patterns or policing practices across the two countries at different points in the pandemic. However, the reduction in cancellation over time suggests that police officer practice was increasingly in line with the legislation and policing policy as time went on.

**Table 16. Percentage of cancelled FPNs by lockdown period, 27 March 2020 to 31 May 2021, England and Wales**

Lockdown stage	England	Wales	Total
Period 1	7.0%	4.7%	6.6%
Period 2	7.1%	2.2%	6.7%
Period 3	4.6%	2.4%	4.4%
Total	5.4%	2.9%	5.1%

The percentage of cancelled FPNs varied by police force area over time but was consistently highest across all three periods in the West Midlands, at 27.9%, 38.7% and 17.6% respectively (see Table A1 Annex 5).

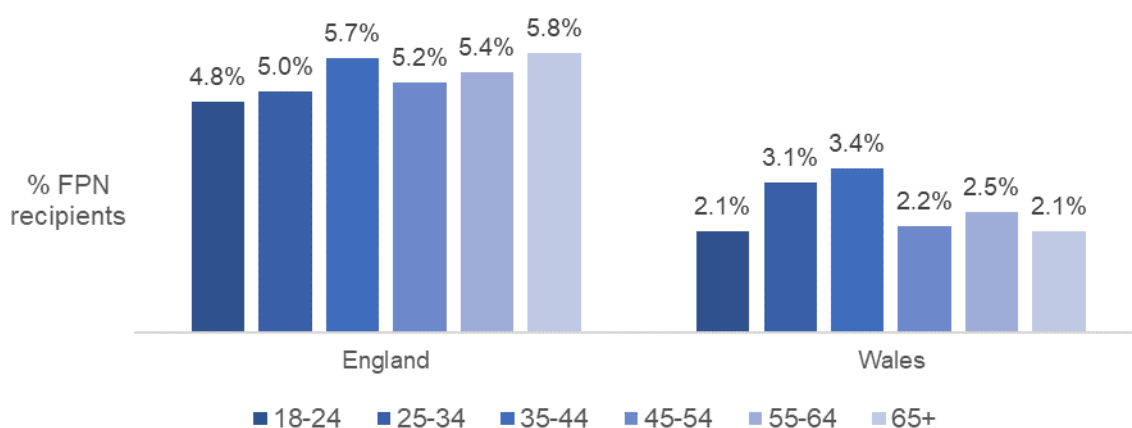
### 7.2.3. Cancellation by demographic profile

This section of the report looks at the demographic profile of those whose tickets were cancelled in England and Wales. As such, the analysis is based on the number of individual FPN recipients, and not the number of FPNs issued.

#### Sex and age

Both male and female FPN recipients in England were more likely to have FPNs cancelled than those in Wales. Nevertheless, there was no significant difference in the percentage of males and females who had tickets cancelled within England (5.5% versus 5.3%, respectively) nor within Wales (3.2% versus 2.7% respectively).

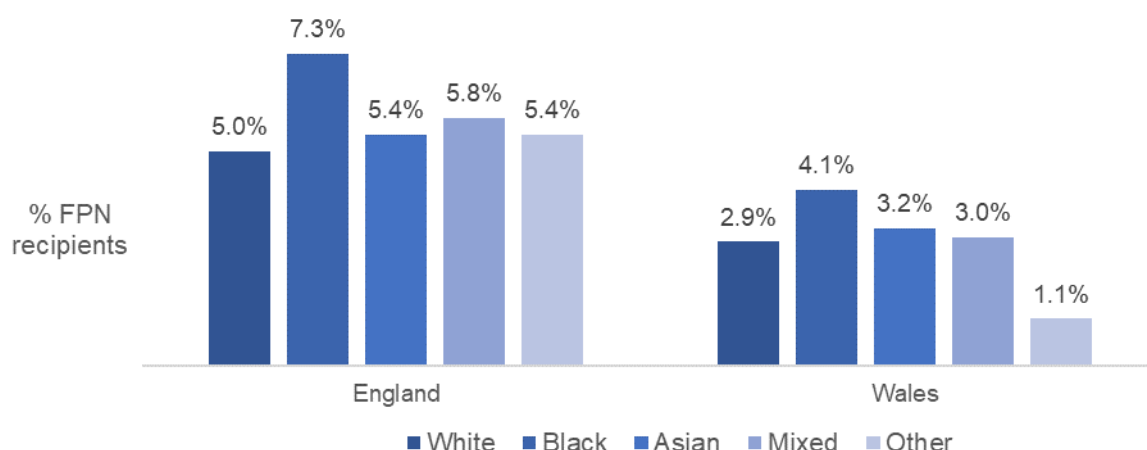
Figure 16 shows that cancellation was higher amongst all age groups in England compared to Wales. There was also a different age pattern between the two countries. Cancellation appeared to increase gradually by age group in England; whereas, in Wales, it was highest for those aged between 25 and 44, but around the same level for all other age groups. Differences by age group were significant for both countries.



**Figure 16. Percentage of FPN recipients with at least one cancelled ticket by age-band, 27 March 2020 to 31 May 2021, England and Wales**

### Ethnicity

The percentage of FPN recipients who had at least one fine cancelled varied significantly by ethnic group. FPN recipients from all ethnic groups in England were more likely to have a fine cancelled, compared to those in Wales. However, in England, recipients from any ethnic minority background were significantly more likely to have an FPN cancelled than those from white backgrounds (6.1% compared to 5.0%, respectively). In Wales, this difference was much smaller and not statistically significant (3.2% compared to 2.9%, respectively). Looking at these differences by ethnic group, Figure 17 shows that those from a black ethnic group were more likely to have FPNs cancelled (which means that the inflated rates presented earlier in this report may be lower if cancelled FPNs were to be excluded from the analysis). However, this was only significant in England, not in Wales.



**Figure 17. Percentage of FPN recipients with at least one cancelled fine by ethnic group, 27 March 2020 to 31 May 2021, England and Wales**

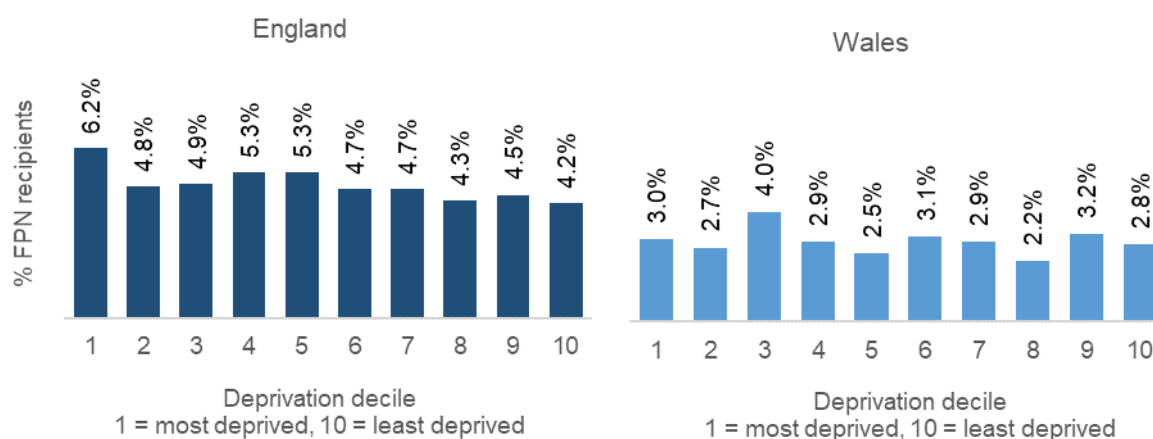


The higher prevalence of cancellation amongst FPN recipients from ethnic minority backgrounds was not simply because fines were issued at a higher overall rate for these groups. These findings indicate that there was a genuinely higher likelihood that ethnic minority FPN recipients, in particular those from a black background, would have a fine cancelled, regardless of how many were issued.

This is the first time that data on the cancellation of fines in England and Wales has been published, so there are no baseline data to say whether the rates are higher or lower than expected. In addition, it is not possible from these data to explain the differences in the rates of cancellation between groups or over time. As noted earlier, detailed information on the internal review processes introduced by police forces is also limited.

### Area deprivation

Figure 18 shows the percentage of FPN recipients in England and Wales with at least one cancelled FPN by deprivation decile. FPN recipients in England who were living in one of the 10% most deprived LSOAs were most likely to have an FPN cancelled (6.2%), while those living in the 10% least deprived LSOAs were least likely (4.2%). These differences between recipients living in different deprivation deciles were statistically significant. However, amongst those issued with FPNs in Wales, there was no distinct pattern or significant difference in the likelihood of having an FPN cancelled according to deprivation decile.



**Figure 18. Percentage of FPN recipients with at least one cancelled FPN by deprivation decile, 27 March 2020 to 31 May 2021, England and Wales**

#### 7.2.4. Cancellation by repeat FPNs

In both England and Wales, those issued with repeat FPNs were three times more likely to have at least one fine cancelled, compared to those issued with just one FPN. Table 17 shows that in England, 19.2% of those issued with repeat FPNs had at least one fine cancelled, compared to 5.0% of those issued with a single FPN. Similarly, in Wales, 9.9% of those issued with more than one FPN had at least one fine cancelled, compared to 2.8% of those issued with a single FPN. This suggests that, amongst those who were subject to repeated enforcement, it was more common for concerns to be raised about the issuing of the fine than amongst those who only received one.

**Table 17. Number and percentage of FPN recipients with cancelled fines, by number of FPNs received, 27 March 2020 to 27 May 2021, England and Wales**

Single or repeat FPNs	England		Wales	
	Number	%	Number	%
One FPN	4,966	5.0%	311	2.8%
More than one FPN	900	19.2%	42	9.9%
Total	5,866	5.6%	353	3.1%

#### 7.2.5. Cancellation by reason for issuing FPN

The likelihood of a having an FPN cancelled varied by reason for issue in both countries. Table 18 shows that in England, those fined for general failure to comply with instructions were most likely (10.7%) to have a FPN cancelled, while the prevalence of cancellation was about half (5.5%) for illegal movement/travel or attending an illegal gathering. The equivalent percentages for cancellation by offence type for Wales were far smaller; however, the general pattern was the same as that for England.

**Table 18. Number and percentage of FPN recipients with cancelled fines by alleged offence type, 27 March 2020 to 27 May 2021, England and Wales**

Alleged offence type	England		Wales	
	Number	%	Number	%
Fined for failure to comply with instructions	519	10.7%	16	3.5%
Fined for illegal movement/travel	1,678	5.5%	155	2.9%
Fined for attending an illegal gathering	3,445	4.9%	125	2.3%

### 7.3. Payment of FPNs

As with other types of FPN issued in England and Wales, fines issued under the Coronavirus Regulations had a statutory 28-day payment period (although, given the circumstances, a further 5-day grace period was given during the pandemic). Unlike other types of FPN, the Regulations also offered a 50% reduction in the face value of the fine if it was paid within 14 days. It is possible that this type of payment incentive may have encouraged people to pay their Covid fines and to do so quickly, although published data on the payment of FPNs does not provide this information.<sup>48</sup>

Data published for Scotland shows that Covid FPNs were significantly more likely to be paid than FPNs issued in relation to anti-social behaviour; however, there were differences in the likelihood of payment by different groups in the population.<sup>49</sup> In particular, those issued with multiple FPNs (which incurred incrementally increasing costs) were less likely to pay than those issued a single fine. This section of the report examines the profile of FPNs that were paid within the statutory period as recorded by ACRO and compares it to those fines that were recorded as non-compliant. Note, however, that some FPNs recorded as non-compliant by ACRO were likely to have been paid after referral to the Courts.

#### 7.3.1. Payment by police force area

A total of 66,493 FPNs in England and Wales were paid within the statutory period, representing 57.3% of all fines issued that were not subsequently cancelled. Even though FPNs were issued at a much higher rate in Wales, they were also significantly more likely to be paid than those issued in England (65.5% versus 56.4%, respectively). It is possible that the much lower value of the fine in Wales contributed to a higher likelihood of payment.

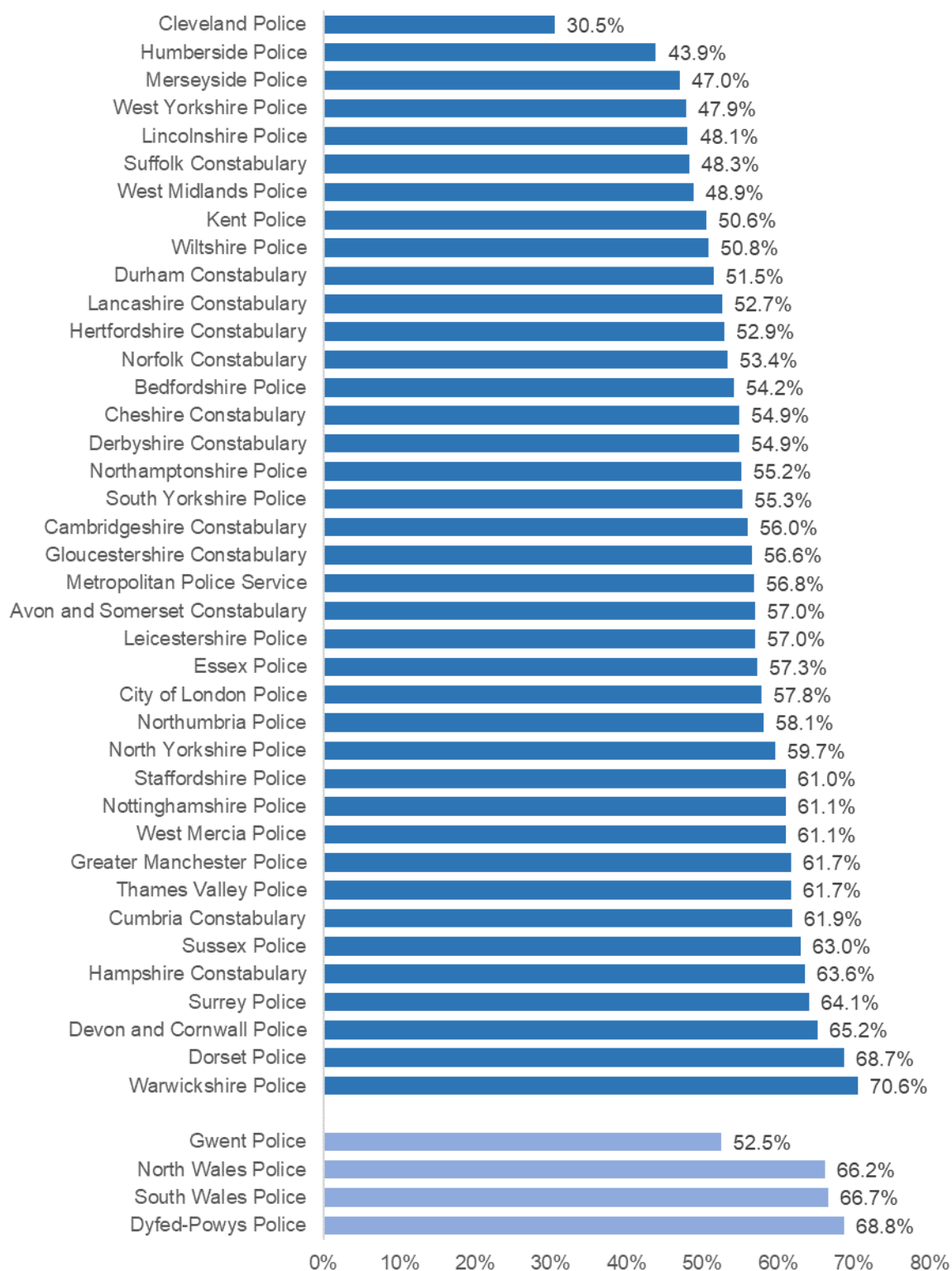
As with previous geographical analysis in this report, there was considerable variation across PFAs in the percentage of FPNs that were paid. Figure 19 shows that payment varied from only 30.5% of all FPNs issued in Cleveland (which issued a far lower than average rate of FPNs overall but was an outlier in terms of payment level), to 70.6% of FPNs issued in Warwickshire (which was around average in terms of its rate of FPNs). Three of the four Welsh PFAs had a higher than average payment level, at upwards of 66%. Gwent however, was much lower at only 52.5% (albeit Gwent also had the lowest rate of issue in Wales). Looking across the PFAs,

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<sup>48</sup> Payment of FPNs within the 28-day statutory payment period in England and Wales up to 27 February 2022 is reported in an NPCC report published on 16 March 2022: <https://news.npcc.police.uk/releases/update-on-coronavirus-fpns-issued-by-forces-in-england-and-wales-and-the-payment-of-fpns>

<sup>49</sup> See McVie (2022). [Payment outcomes of police Fixed Penalty Notices registered by the Scottish Courts and Tribunal Service during the Coronavirus Pandemic](#).

there does not appear to be any clear relationship between payment rate and rate of issue, however.



**Figure 19. Percentage of FPNs paid within statutory period by issuing Police Force Area, 27 March 2020 to 31 May 2021, England and Wales**

Interestingly, FPNs issued to individuals who were not resident within the issuing PFA were significantly more likely to be paid than those issued to residents (63.3% compared to 55.6%, respectively). Over seven in ten (72.7%) FPNs issued to non-residents in Wales (which had a higher proportion of enforcement in relation to illegal travel overall) were paid compared to around six in ten (61.8%) in England. Again, there was substantial variation across PFAs, however.

In thirteen PFAs, there was no significant difference between residents and non-residents in the likelihood of payment. These were Bedfordshire, Cambridgeshire, Cheshire, City of London, Essex, Gloucestershire, Hampshire, Hertfordshire, Kent, Leicestershire, Lincolnshire, and Warwickshire in England, and Gwent in Wales. In the other PFAs there was a significant difference, with non-residents being more likely to pay their FPNs in most areas, except those in the Metropolitan Police Service, Northamptonshire, and Surrey where residents were more likely to pay their fines. As with other parts of this report, it is likely that local factors and the specific circumstances in which FPNs were issued would explain at least some of the differences between PFAs.

### 7.3.2 Change in FPN payment over time

Likelihood of payment changed over the course of the pandemic, although FPNs issued in Wales were consistently more likely to be paid than those issued in England. Table 19 shows that FPNs issued in England during the first lockdown period were significantly less likely to be paid than those issued during the subsequent two periods of restrictions, although payment was highest during the second period when levels of enforcement were lowest overall.

In Wales, the level of payment was also highest during period two; however, there was virtually no difference in the likelihood of payment for those FPNs issued during periods one and three. Again, the consistent difference between England and Wales suggests that the lower value of fines in Wales may have incentivized more people to pay.

**Table 19. Percentage of FPNs paid by lockdown period, 27 March 2020 to 31 May 2021, England and Wales**

Lockdown stage	England	Wales	Total
Period 1	48.6%	65.1%	51.0%
Period 2	63.2%	72.8%	64.0%
Period 3	56.5%	64.2%	57.2%
Total	56.4%	65.5%	57.3%

### 7.3.3. Payment by demographic profile

This section examines the demographic profile of those who paid their FPNs within the statutory period. As such, the analysis is based on the number of individual FPN recipients, and not the number of FPNs issued.

#### Sex and age

Both male and female FPN recipients in Wales were more likely to pay their FPNs than those who received FPNs in England. However, there was a significant sex difference in both countries, as females issued with an FPN in England were more likely to pay than males (60.2% versus 53.7%, respectively). The same was also true within Wales (67.5% versus 64.1% respectively).

There were also age differences in likelihood of payment in England and Wales. Figure 20 shows that those in the oldest age group were most likely to pay, while those aged between 25 and 44 were least likely to pay, in both countries. Interestingly, those in the youngest age category (18-24) had a higher likelihood of payment than expected based on the trend across other age groups. This may be because parents were more likely to assist younger people to pay (since, unlike other forms of punishment, it is not required that the person who commits the offence pays the financial penalty). It is also possible that the higher level of payment amongst those in the youngest age group could be accounted for by socio-economic differences rather than age, which McVie (2022) found in analysis of Scottish data. Differences by age group were significant for both countries, but payment continued to be consistently higher for each age group in Wales.

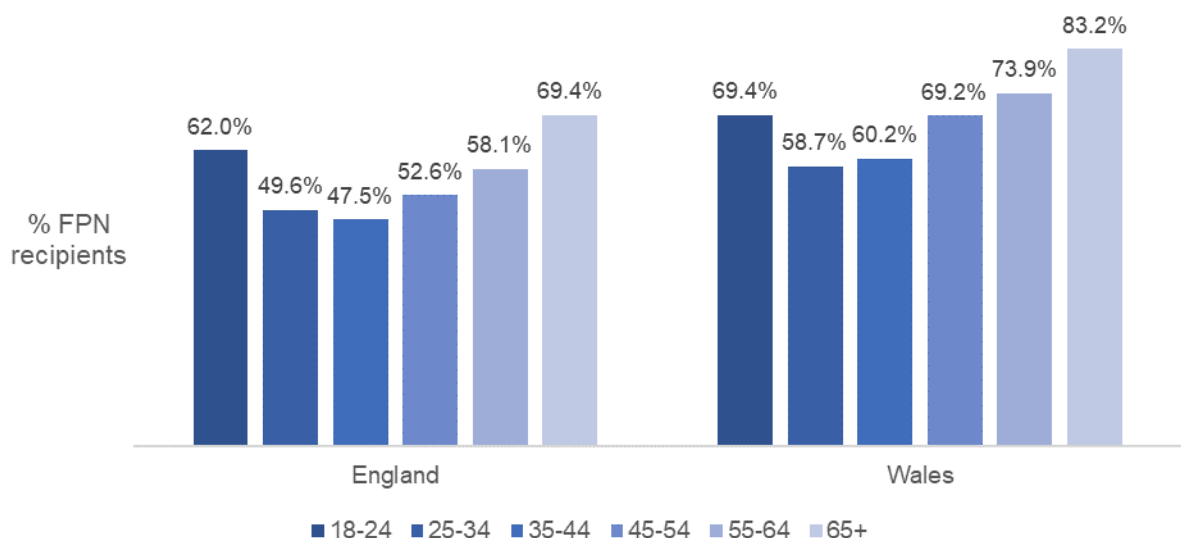
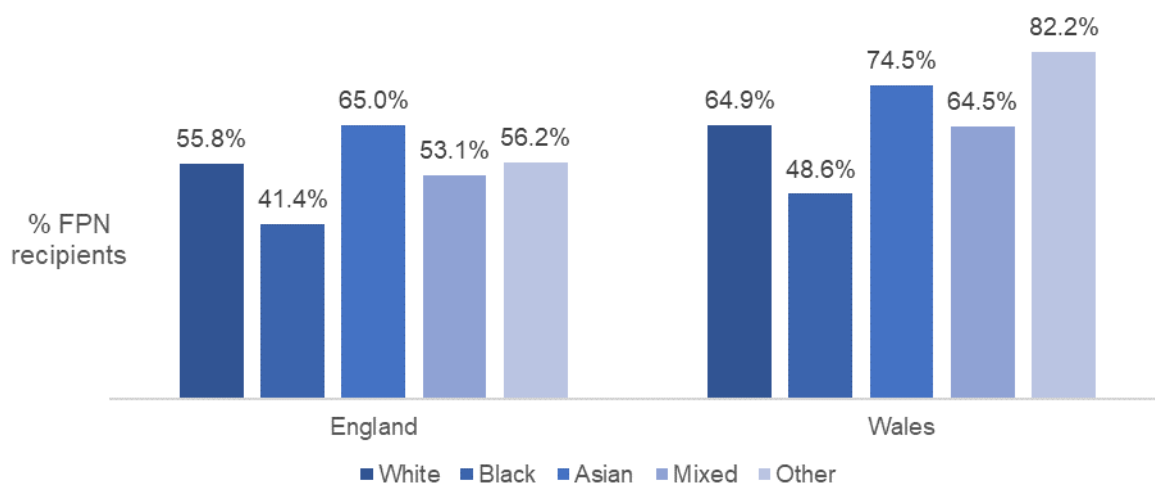


Figure 20. Percentage of FPN recipients who paid fines by age-band, 27 March 2020 to 31 May 2021, England and Wales

## Ethnicity

Amongst those issued with FPNs in England, there was no difference in the likelihood of payment between people from white backgrounds (including white minorities) and those from an ethnic minority background (55.8% and 55.2%, respectively). There was a difference amongst those issued with FPNs in Wales, with those from ethnic minority backgrounds being more likely to pay (68.5%) than those from white backgrounds (64.9%).

There were some differences between specific ethnic minority groups in terms of likelihood of payment which cancelled each other out to some extent, as shown in Figure 21. For example, in England, FPN recipients from Asian backgrounds were the most likely to pay while those from black backgrounds were least likely to pay. Those from mixed or other backgrounds were similar to the white groups in terms of likelihood of payment. Similarly in Wales, those from Asian backgrounds were far more likely to pay than those from black backgrounds, albeit those from an other ethnic minority background were most likely to pay. Despite differences between groups within countries, however, those issued with FPNs in Wales were more likely to pay than those in their equivalent group in England. Again, this points to a systematic difference between the two countries, which may well be the value of the fines.

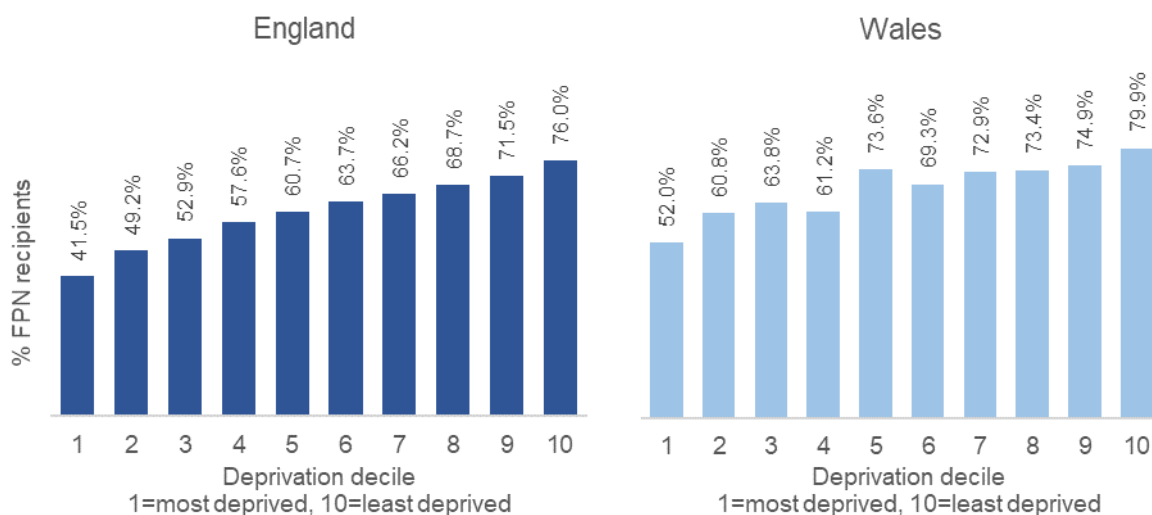


**Figure 21. Percentage of FPN recipients who paid fines by ethnic group, 27 March 2020 to 31 May 2021, England and Wales**

## Area deprivation

There was clear variation in the likelihood of FPN payment according to the level of deprivation in the recipient's area of residence. Figure 21 shows that FPN recipients living in one of the 10% most deprived LSOAs were least likely to pay their fine within the statutory time period, while those living in the 10% least deprived LSOAs were most likely to pay. This was the case in England and Wales, although the

gradient is clearer in the figure for England. The differences between deprivation deciles were however statistically significant for both countries. Again, likelihood of payment was consistently higher across deprivation deciles for FPNs issued in Wales compared to England, which suggests that underlying socio-economic circumstance was not the reason for the higher payment level.



**Figure 22. Percentage of FPN recipients who paid fines by deprivation decile, 27 March 2020 to 31 May 2021, England and Wales**

### 7.3.4. Payment by repeat FPNs

Previous research in Scotland suggested that payment was lowest by far amongst those who were issued with more than one FPN.<sup>50</sup> Analysis of the data for England and Wales also found this to be the case. As shown in Table 20, 56.4% of those who were issued with one FPN in England paid their fine; however, only 37.2% of those issued with more than one FPN in England paid at least one of their fines. In Wales, the equivalent figures were 65.8% and 50.1%, respectively.

**Table 20. Number and percentage of FPN recipients who paid fines, by number of FPNs received, 27 March 2020 to 27 May 2021, England and Wales**

Single or repeat FPNs	England		Wales	
	Number	%	Number	%
One FPN	56325	56.4%	7292	65.8%
More than one FPN	1742	37.2%	212	50.1%
Total	58067	55.5%	7504	65.2%

<sup>50</sup> McVie, S. (2022) Op. Cit.



Looking at the overall prevalence of payment, the gap between single and repeat FPN recipients in England was 1.5 times compared to 1.3 times in Wales. So, while there was a significant difference between single and repeat FPN recipients in both countries, this was more acute in England. This difference between countries may well be explained by the fact that the base value of fines in England was far higher than in Wales, and the value of subsequent fines doubled each time, meaning that the financial impact of being a repeat offender in England was substantially greater than in Wales.

### 7.3.5. Payment by reason for issue

The reason for issuing the FPN may have played an important role in determining payment, especially amongst those who felt that the reason was not justified. Table 21 shows that those issued with FPNs for a general failure to comply with instructions were least likely to pay in both countries, although the payment rate was substantially lower in England (39.9%) than Wales (58.1%). Prevalence of payment was highest in England amongst those issued with FPNs for attending illegal gatherings (59.2%) and highest in Wales amongst those issued with FPNs for illegal movement or travel (67.9%).

**Table 21, Number and percentage of FPN recipients who paid fines by alleged offence type, 27 March 2020 to 27 May 2021, England and Wales**

Alleged offence type	England		Wales	
	Number	%	Number	%
Fined for failure to comply with instructions	1,812	39.9%	269	58.1%
Fined for illegal movement/travel	15,738	52.3%	3,638	67.9%
Fined for attending an illegal gathering	41,084	59.2%	3,567	63.9%

Note that payment levels were higher amongst those issued with fines in Wales for all reasons, although the gap was narrowest for those attending illegal gatherings. Again, this could well suggest that the lower level of payment in Wales encouraged more people to pay their fines regardless of the reason for issue.

## 8. Conclusion

The Regulations issued by the UK and devolved Governments in response to the public health risks of the Coronavirus pandemic placed unprecedented restrictions on all members of society. Extraordinary new powers of enforcement enabled police officers to issue Fixed Penalty Notices (FPNs) for behaviours and activities that would, under normal circumstances, have been completely law abiding. This report provides a descriptive overview of all FPNs issued in England and Wales in relation to travel and movement, attending illegal gatherings, and failure to follow instructions between 27 March 2020 and 31 May 2021. It has certain limitations in terms of explaining patterns within the data and cannot address core questions about compliance within the population; nevertheless, it offers useful insights into the use and outcomes of these extraordinary new policing powers as the pandemic progressed.

The four UK nations started from a similar position with respect to the initial Regulations (which placed the population under 'lockdown') and the value and structure of the FPNs that could be issued by the police. As the pandemic progressed, however, a convoluted legislative landscape evolved, with different rules covering different places at different times. The value of FPNs also increasingly diverged between countries, with larger fines issued in England compared to the devolved nations. For people fined in England, the median cost for people in receipt of a single FPN was £100, compared to £30 in Wales. Unlike other monetary penalties in the UK, FPNs issued under the Coronavirus Regulations also doubled in value for each subsequent offence, which increased the median cost for repeat FPN recipients to £500 in England and £180 in Wales.

The rate of FPNs issued per 10,000 population was 1.9 times higher in Wales than in England. The rate of enforcement was higher in Wales during all three periods of the pandemic, but the difference to England was greatest during the first lockdown. Nevertheless, the bulk of all enforcement activity within both countries took place during the period from January to May 2021, during which Wales was in its second national lockdown (excluding the 'firebreak' in late 2020) and England was in its third. It is not possible to offer a definitive explanation for the higher rate of enforcement in Wales; however, differences in the nature and timing of the restrictions may have impacted differentially on police use of enforcement. It is also possible that the much higher value of fines in England could have acted as a greater deterrent to members of the public (in terms of non-compliance) or may have influenced the enforcement activities of the police (by raising the threshold of tolerance amongst officers). Distinct differences in the profile of offences and offenders also suggest that police officers in Wales experienced a higher level of

demand in terms of non-residents making illegal cross-border trips, especially along the border with England.

Rates of enforcement varied substantially by Police Force Area (PFA), although they were consistently higher in the four Welsh forces (all of which had an enforcement rate above the English PFA average). During the first lockdown, PFAs covering more remote and rural localities with areas of natural beauty and tourist destinations had amongst the highest rates of enforcement; whereas rates increased relatively more within PFAs with larger urban populations as the pandemic progressed. This reflects a shift in emphasis away from policing public spaces towards policing illegal gatherings and parties. Demand on policing resources due to illegal travel and movement also became more problematic as the pandemic wore on, which impacted on some PFAs more than others. In Cumbria, Surrey, and Dorset, for example, half or more of all FPNs were issued to non-residents. As noted above, enforcement in Wales reflected far greater levels of cross-border travel, with three quarters of all FPNs issued to non-residents involving people travelling from England into Wales. Confusion about the different restrictions in place in England and Wales, and the earlier easing of restrictions in England (especially after the first lockdown), may have contributed to the elevated level of enforcement in Wales.

There were differences between demographic groups in the likelihood of receiving an FPN under the Coronavirus Regulations which were not entirely unexpected. FPNs were far more likely to be issued to younger people, especially young men. The age-sex profile of FPN recipients was very similar to the 'age crime curve' typically observed within policing data; however, there was a notable increase in the relative use of enforcement towards those aged 18 to 24 between the first lockdown and subsequent periods of the pandemic, which is consistent with wider evidence that compliance levels fell most amongst those in the youngest age groups, and that officers were increasingly being called to deal with illegal social gatherings. Nevertheless, it is difficult to be certain that the police data on FPNs accurately reflects patterns of compliance, as it is plausible that younger people were more likely than other age groups to be reported to, or come to the attention of, police officers during the pandemic (especially in relation to encounters involving larger groups and noisy parties). The data presented here cannot answer this question.

FPNs were overwhelmingly issued to people from white backgrounds (including white minorities); however, taking population size into account, there was evidence of ethnic disproportionality in the use of enforcement. Compared to those from white backgrounds, FPNs were issued to people from ethnic minority backgrounds at a rate that was 2.3 times higher in England and 2.8 times higher in Wales. The highest disparity rate in England was amongst people from black backgrounds (3.2), while the highest in Wales was amongst people from mixed (3.5) or Asian (3.1) backgrounds. Ethnic disparities were consistently higher for men than women and

were highest overall amongst those in the oldest age group (45+). The disparity in enforcement rates between white and minority ethnic groups declined over time in Wales, but increased in England. Therefore, whatever factors were underpinning ethnic disparities, they may not have been the same in England and Wales.

There was ethnic disparity in the use of enforcement across all PFAs in England and Wales. This ranged from 1.4 in Warwickshire to 8.4 in Cumbria. However, after excluding those who were not resident within the issuing PFA (i.e., those likely to have been involved in illegal travel across local authority borders), the rate of ethnic disparity reduced substantially across many PFAs, especially in Wales. For example, the ethnic disparity rate in Cumbria reduced from 8.4 to 2.3; while in North Wales it reduced from 4.1 to 1.1. This reduction in ethnic disparity rates suggests that, within some PFAs, enforcement amongst those who were not normally resident in that area may have disproportionately involved people from ethnic minority backgrounds.

Ethnic disproportionality within England and Wales is not uncommon, especially in relation to ‘street-based’ policing practices such as stop and search;<sup>51</sup> therefore, given the significant focus on public policing during the pandemic, it might reasonably have been expected that some ethnic disproportionality would have occurred. Research with police officers has suggested that those from minority ethnic backgrounds were not necessarily more likely to break the rules, but may have been “more likely to do so in circumstances that make them visible to the police and thus available for intervention”.<sup>52</sup> It is possible that this increase in visibility was greater within some police force areas than others, especially during periods of restriction when far fewer people than usual were travelling. However, it is also possible that the Coronavirus Regulations impacted differentially on the behaviours or travel patterns of different groups in the population for other reasons. Uncertainty about different patterns of compliance within the population makes it difficult to draw any conclusions about ethnic disproportionality in policing practice in this report.

Like Scotland, the data showed that FPN recipients in England and Wales were disproportionately likely to be living in areas of high deprivation. In England, fines were 4.8 times more likely to be issued to people living in the 10% most deprived communities of either England or Wales than those in the 10% least deprived areas, while the equivalent figure for Wales was 3.0. The disparity in likelihood of enforcement between those in the most and least deprived areas declined over the course of the pandemic, which suggests some widening of the social spectrum amongst those who the police were encountering in breach of the Regulations.

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<sup>51</sup> See UK Government Report on Stop and Search published 27 May 2022. <https://www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law/policing/stop-and-search/latest#by-ethnicity>

<sup>52</sup> See Turner, Rowe and Redman (2022: v) Every ticket tells a story. <https://www.n8prp.org.uk/wp-content/uploads/sites/315/2022/08/Every-Ticket-Tells-a-Story-Full-Report-10.05.2022.pdf>

However, a deprivation gap persisted in both England and Wales which supports wider evidence that those living in deprived areas were disproportionately impacted by the restrictions throughout the pandemic.<sup>53</sup>

It is unclear why an incremental fining structure was introduced under the Coronavirus Regulations, but this report found heightened inequalities amongst those who received two or more FPNs. The majority of FPN recipients in England and Wales received only one; however, those issued with multiple FPNs were significantly more likely to be living in areas of high deprivation. Moreover, repeat recipients were significantly less likely to have paid their FPNs within the statutory period. Repeat recipients were also more likely to have had FPNs cancelled, suggesting they may have been issued incorrectly or unfairly. Given the much higher median value of fines incurred amongst those subject to repeat enforcement (especially in England), the lower payment rate is not surprising as repeat fines would have placed additional financial stress on those who were least able to afford it, especially if this exacerbated other economic problems caused by pandemic. This suggests that the incremental fining structure introduced under the Regulations added an additional level of inequality amongst those who were unable or unwilling to comply.

Internal processes were put in place to review whether FPNs under the new Regulations were issued in accordance with the law and guidance issued by the College of Policing and NPCC. Overall, around 1 in 20 FPNs issued in England and Wales were cancelled; although this rose to 1 in 5 for FPNs issued to those who were not resident within the PFA of issue, suggesting that more errors may have been made in relation to illegal travel and movement than other forms of non-compliance. In England, FPN recipients from an ethnic minority background were slightly more likely to have a fine cancelled than those from a white background, and those living in more deprived areas were slightly more likely to have an FPN cancelled than those living in less deprived areas; however, there was no ethnic or area difference in Wales. The level of cancellation varied widely across PFAs, from 1.1% of all FPNs issued in Warwickshire to 23.5% in West Midlands. Overall, cancellation of fines reduced over time; however, it was consistently higher in England than Wales. More information about the process of cancelling fines, and the reasons for differences across PFAs, may be valuable in understanding how checks and balances were applied during the course of the pandemic.

This data report provides valuable insights into the profile and patterning of police enforcement during one of the most tumultuous periods in recent history. Policing and enforcement played a major role in the respective UK governments' response to

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<sup>53</sup> See Finch and Tinson's report on the continuing impact of Covid-19 on health and inequalities. <https://www.health.org.uk/publications/long-reads/the-continuing-impact-of-covid-19-on-health-and-inequalities>

the pandemic; however, it is difficult to assess the long-term impact and effectiveness of enforcement on public compliance. Patterns of policing response during the pandemic are likely to reflect a number of factors, including differences in non-compliance between groups, local policing demands and approaches, public reporting habits, and/or the nature, timing, and locality of restrictions. Regulatory differences and public confusion around these may well explain some of the variation in enforcement levels between England and Wales. Lower fine values may also have contributed to higher rates of enforcement in Wales, compared to England; and almost certainly resulted in higher payment of fines in Wales across all groups. Further research would be needed to explore some of these areas of complexity.

## Annex 1. Key legislative changes during periods covered by the report

### Period 1: 27 March to 3 July 2020

26 March 2020: Regulations come into force in England, Scotland, and Wales, providing the police with powers of enforcement and a power to issue FPNs for non-compliance. Northern Ireland follows on 28 March.

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16 April 2020: [UK-wide lockdown extended](#) for 'at least three week'

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8 May 2020: Lockdown in Wales [extended for three weeks](#), with minor adjustments

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11 May 2020: 'Stay at home' message in England replaced with '[Stay alert](#)', with some easing of restrictions

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29 May 2020: 'Stay at home' message in Wales is changed to '[stay local](#)'

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### Period 2: 4 July to 31 December 2020

4 July 2020: UKs first [local lockdown](#), in Leicester and parts of Leicestershire, comes into force. Some restrictions [eased in England](#).

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6 July 2020: Requirement to '[stay local](#)' in Wales is [lifted](#), allowing for cross-border travel

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18 July 2020: Local authorities in England provided with [new powers to enforce social distancing](#)

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15 August 2020: [Further restrictions lifted in England](#)

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6 September 2020: 2,988 new coronavirus cases reported across the UK, an increase of 1,175 cases from the previous day, described as a '[significant new spike](#)'

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8 September 2020: Local restrictions in Caerphilly County Borough Council area. Restrictions are subsequently introduced in other local authority areas in Wales.

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14 September 2020: 'Rule of 6' introduced in [England](#) and [Wales](#), limiting social gatherings

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24 September 2020: Restrictions on businesses (e.g., closing early) in [England](#) and [Wales](#). Penalties for breaching social gatherings in England increase to £200, rising to £6,400 maximum.

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14 October 2020: Three-tier system of [regional restrictions in England](#) starts. Liverpool City Region is placed on the 'very high' alert level (the highest).

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23 October to 9 November 2020: 'Stay at home' [fire-breaker in Wales](#)

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16 October 2020: [Travel into Wales](#) from high prevalence areas in England and Scotland restricted

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9 November: [National measure in Wales](#) replace the firebreak, with limits on social gatherings

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5 November to 2 December 2020: Second [national lockdown](#) comes into force in England

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2 December 2020: Second lockdown in England ends. Replaced with a stricter [three-tiered system](#), with most locations initially placed in tiers two and three

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4 December 2020: [Travel between Wales and some parts of the UK prohibited](#). No restrictions on travel within Wales. Restrictions on hospitality and leisure in Wales

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19 December 2020: UK Prime Minister announces a new [Tier 4 'Stay at Home' alert level](#). Christmas mixing rules tightened.

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20 December: [National lockdown in Wales](#) takes effect. Christmas mixing rules tightened

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21 December 2020: Tier 4 restrictions come into effect in London and South-East England

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26 December 2020: [More regions in England](#) placed in Tier 4

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### **Period 3: 1 January to 31 May 2021**

4 January 2021: '[Stay at home](#)' order announced in England, expected to last until mid-February.

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6 January 2021: 'Stay at home' [restrictions in England take effect](#)

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8 March 2021: England '[Step 1](#)' out of lockdown begin. Stay at home order remains in place

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13 March 2021: Stay at home restrictions in Wales replaced with '[stay local](#)'. Steps out of lockdown begin.

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27 March 2021: [Stay local restrictions in Wales lifted](#) to allow people to travel within Wales

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29 March 2021: '[Stay at home](#)' order in England ends, with encouragement to stay local. Restrictions on social gatherings in England eased to allow for limited outdoor mixing

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12 April 2021: [Travel between Wales and the rest of the UK](#) allowed. [England moves to 'Step 2'](#), with restrictions on businesses and hospitality eased. Wider social contact rules continue, with no indoor mixing between different households

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24 April 2021: In Wales [any six people can meet outdoors](#). Temporary Section 35 Orders are put in place in some areas, giving South Wales Police powers to break up crowds

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17 May 2021: [Limited indoor mixing](#) allowed in Wales. [International travel](#) resumes under a UK-aligned traffic light system. England moves to '[Step 3](#)'. Up to 30 people can meet outdoors, with 'rule of 6' for indoor gatherings.

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## Annex 2. Data and Methodology

### Data

Individual-level data was extracted by the ACRO Criminal Records Office from their central database of FPNs issued under the Health Protection (Coronavirus Restrictions) Regulations between 27 March 2020 and 31 May 2021. Before supplying the data to the analysts, personal data fields were removed to ensure the data was anonymised and individuals could not be identified.

Note that only adults aged 18 or over were eligible to be issued a fine although it is possible that, at the time of issuing an FPN, the age of an individual was not known. Where an FPN was found to have been issued to an individual under the age of 18, the fine was subsequently cancelled. Any fines issued to individuals aged under 18 were not included in the analysis.

The analysis also *excludes* FPNs issued for the following reasons:

- FPNs issued under 'local lockdowns'. The timing and locus of these restrictions varied considerably across England and Wales, which makes it difficult to conduct robust comparisons over time or across police force areas.
- FPNs issued for breaches of regulations governing businesses and hospitality venues, and the organisation of large gatherings (attending by 30 people or more) or events. These are materially different from the standard list of offences committed by individuals, incurred much larger fines, and would not contribute to the analysis around disproportionality.
- FPNs issued under the International Travel Regulations. These incurred higher fines than the standard list of restrictions and were not the subject of routine policing activity.
- FPNs issued in relation to breaches of face covering regulations. Different sets of regulations (around the wearing of face coverings on public transport and in certain indoor premises) were introduced at different times in England and Wales, and were subject to different guidance around enforcement; therefore, it is not possible to conduct reliable comparisons over time or across police force areas.
- FPNs issued by the British Transport Police and the Ministry of Defence, as no information was provided on where they had been issued.
- FPNs recorded as 'duplicates', which may be due to the accidental issue of a second ticket or due to an administrative error.

## Counting fines and people

It is important to distinguish between counting fines and counting people. The Health Protection Regulations in England and Wales allowed for individuals to be issued with multiple FPNs.<sup>54</sup> Data published previously by the NPCC showed that 4.2% of all FPNs for breaching the Coronavirus Regulations in England and Wales between 27 March and 20 July 2020 were issued to repeat FPN recipients.<sup>55</sup> This is substantially lower than Scotland, where 21.9% of all FPNs issued between 27 March and 31 May were issued to people who received two or more fines.<sup>56</sup>

Some of the analyses in this report involves counting fines, while some involves counting people. Analyses that examine trends and patterns in the use of FPNs are based on the number of fines issued, no matter who received them. Analyses that examine the profile of FPN recipients (e.g., by age, sex, ethnicity, and area deprivation) is based on the number of people who were fined. This was achieved by aggregating the FPN data for each individual based on a unique personal identifier provided by ACRO. This means that population estimates are more accurate and differences between groups can be tested for statistical significance.

## Ethnic terminology

The report uses Office for National Statistics (ONS) recommended terminology<sup>57</sup> for describing people from different ethnic groups. The two aggregate categories in the report are 'white (including white minorities)' and 'ethnic minorities (excluding white minorities)'. Note that for brevity, when reporting aggregate ethnic categories that the terms 'white' and 'ethnic minority' are used in tables and figures.

As police forces have their own systems and codes for recording ethnicity, the analysis in this report grouped codes into five categories that are aligned with the ethnicity categories used for the 2016 mid-year population estimates.

These five groups are broad categories, which obscure important variation, for example between black African and black Caribbean. For further information about the groups of ethnicity used in this report, see further this Annex: measuring ethnic disproportionality; data limitations; and ethnic disproportionality.

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<sup>54</sup> Note that this was not the case in Scotland, where the Health Protection Regulations capped the number of FPNs that could be issued to a single individual to five, and this was further lowered to four after guidance was issued by the Lord Advocate. For further information, see McVie, S. and Matthews, B. (2021) [Third Data Report on Police Use of Fixed Penalty Notices under the Coronavirus Regulations in Scotland: March to December 2020](#).

<sup>55</sup> Table 5 in the NPCC Data Pack (2020) shows that 787 out of 18,889 FPNs were issued to repeat FPN recipients.

<sup>56</sup> See section 3.1 of McVie (2021) [Second data report on Police Use of Fixed Penalty Notices under the Coronavirus Regulations in Scotland](#)

<sup>57</sup> Office for National Statistics [Writing about ethnicity](#).

## Data used to calculate population rates

Population data used to calculate the rates presented in this report are drawn from two different data sources.

### 2020 APS data

To compare the profile of FPNs issued by age, sex and ethnicity, the analysis uses population rates calculated from Annual Population Survey (APS) data (March 2020). APS is a combined statistical survey of households in Great Britain, compiled by the Office for National Statistics (ONS) using Labour Force Survey data.<sup>58</sup> The survey provides recent population estimates for age, sex, and ethnicity in England and Wales; however, it is important to note that these estimates will be subject to some degree of error, especially for smaller ethnic minority groups. The APS data were accessed via the UK Data Service and weighted using the population weight for 2020.<sup>59</sup>

Population data were restricted to those aged 18 or over, to align with the minimum age in the Regulations. Population estimates derived for age, sex and ethnicity used in this report are summarised in Annex 4. Note that these population estimates for England and Wales are slightly different to those used in the previous NPCC report (Currenti and Flatley, 2020), which means that any population-based analysis between these two reports is not directly comparable.

### 2016 ONS data

APS data on ethnicity was not available at a PFA level. Therefore, population-based analysis in relation to ethnicity at PFA level was based on data from the 2016 ONS ethnic group mid-year population estimates, consistent with the previous NPCC report by Currenti and Flatley (2020). These data provide the most recent population estimates by ethnic group at a PFA level; however, there are some issues with them that should be borne in mind. First, the ONS data are experimental statistics and so come with a level of uncertainty in their accuracy; Currenti and Flatley noted that “owing to concerns about the quality of these estimates, ONS have designated them as research outputs, rather than official statistics”. Second, they are population estimates for 2016 and the FPN data relate to activities in 2020-21. If there have been population changes between these periods, they would not be reflected in the population estimates used in our analysis. This may mean that the FPN rates by ethnicity – and so our calculated disparity rates – are inaccurate due to changes in

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<sup>58</sup> ONS 2019 Population Estimates for England and Wales are considered the most accurate source of data for calculating population rates by ethnic group; however, the data were not available at the level of demographic granularity required for this report.

<sup>59</sup> The UK Data Service is funded by the Economic and Social Research Council as a repository to store high quality social and economic data. <https://ukdataservice.ac.uk/>

the population denominator used to calculate the rates. This could particularly affect PFAs with small ethnic minority populations, where small changes in the estimated ethnic minority population could lead to large differences in the estimated FPN rates. Third, the population estimates were only available for the entire resident population, not just for those aged 18 or over, so the rates will not accurately reflect the underlying population eligible to receive FPNs. In addition, the 2016 ONS data include those resident in communal establishments, whilst the 2020 APS data do not.<sup>60</sup> This means there will be slight differences in rates per capita between the two sources of population data used in the report.

### **Population rates and ethnicity**

It is particularly important to be cautious about interpreting population rates by ethnic group in the report, as there is an unknown margin of error around how accurate the population data are. APS data provide estimates by ethnic group at a national level; however, they are neither national nor experimental statistics and, therefore, accuracy cannot be guaranteed.<sup>61</sup> Equally, as noted above, the ONS 2016 ethnic population estimates are designated as research outputs, rather than official statistics, due to uncertainty around the reliability of the estimates. The gold standard for population data is the Census; however, ethnic diversity has increased significantly since the last Census was conducted in 2011 and, unfortunately, 2021 Census data on ethnicity were not available at the time of writing. Population estimates by ethnic group were available for England and Wales for the year 2019; however, these were not available at the level of granularity required for this report. Note, however, that prior analysis found similar rates across different ethnic groups.<sup>62</sup>

### **Police ethnicity data**

Officers were encouraged to record the ethnicity of individuals issued with an FPN. Typically, individuals were asked to provide this information themselves but, where this was not disclosed, officers could provide an officer-perceived ethnicity. In this report, self-reported ethnicity was used as to define ethnic group; however, where this was not disclosed, officer-identified ethnicity was used. A small proportion of FPNs (5% overall) were issued to individuals who did not disclose their ethnicity and the officer did not provide a perceived ethnicity. These cases are included in the general analysis, but excluded from any analysis by ethnic group.

As police forces have their own systems and codes for recording ethnicity, the analysis in this report grouped codes into five categories that are aligned with the

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<sup>60</sup> See ONS (2019) [Research report on population estimates by ethnic group and religion](#).

<sup>61</sup> See ONS (2021) [Review of the current evidence base for population estimates by ethnic group](#).

<sup>62</sup> Currenti, R. and Flatley, J. (2020) [Policing the Pandemic](#) NPCC.

ethnicity categories used for the 2016 mid-year population estimates. These are as follows:

Two-group ethnicity terms used:	Five-group ethnicity terms used:	2016 ONS mid-year population ethnicity categories included in each group:
White (including White minorities)	White	White English / Welsh / Scottish / Northern Irish / British All Other White: Irish / Gypsy or Traveller / Other White
	Asian	Asian / Asian British and Chinese Asian British / Indian / Pakistani / Bangladeshi / Chinese / Other Asian
Ethnic minorities (excluding White minorities)	Black	Black / African / Caribbean / Black British Black British / Black African / Black Caribbean / Other Black
	Mixed	Mixed / Multiple ethnic groups White and Black Caribbean / White and Black African / White and Asian / Other Mixed
	Other	Other ethnic group Arab / Any other ethnic group categories

### Measuring ethnic disparity

In this report, ethnic disparity rates were calculated to assess differences in the likelihood of being issued with an FPN for different ethnic groups. The disparity rates were calculated by dividing the rate of FPNs issued per 10,000 population for each ethnic minority group (using the appropriate population denominator for that group) by the rate issued per 10,000 population for the white group. Any value greater than 1 indicates that the rate per capita of FPNs issued to people from the ethnic minority group was higher than that for white people.

While these findings reflect statistical disparity, it is important to be cautious about interpreting them as unfairness or disproportionate policing. First, as noted above, there is a degree of uncertainty about the degree of accuracy of the population rates based on data for ethnic minority groups in the UK. Secondly, disparity in policing may be a reflection of underlying population behaviour (e.g. differences between groups in the likelihood of breaching the Coronavirus Regulations) which was not measured. Third, policing activity is driven to a large extent by public reporting practices, which may vary in relation to people of different ethnic groups. Thirdly, disparities in fining rates may reflect factors other than ethnicity (e.g. underlying age and sex differences).

## **Statistical significance testing**

Throughout this report, we use statistical testing to assess whether differences between groups are larger than we might have expected to see by chance, given the number of FPNs issued and the population estimates for the different ethnic groups. A 95% confidence threshold was used to test the significance of any statistical differences between groups.

Testing for statistical significance helps to provide assurance around calculated disparity rates, which may be based on small numbers of FPNs and/or small population estimates. However, these statistical significance tests are only illustrative and do not necessarily mean that differences in FPN rates between groups are substantively important. For example, they do not factor in any additional uncertainty which may stem from inaccuracies in the underlying population rates. In addition, they do not adjust for other potential differences between groups. These qualifications should be born in mind when interpreting the findings from this report.

## **Data on area deprivation**

Using home postcode data for FPN recipients at the date of each offence, the ACRO Criminal Records Office attached information about the Lower Super Output Areas (LSOAs) to the dataset that was shared with the analysts. LSOAs are small-area statistical geographies for which standard deprivation measures – the Index of Multiple Deprivation (IMD) in England and Welsh Index of Multiple Deprivation (WIMD) – are available. LSOAs are ranked from 1 (most deprived) to 1,909 (least deprived) on the WIMD, and to 32,844 (least deprived) on the IMD. These are typically then aggregated into ten equal groups which represent the ‘deciles’ of deprivation in each country. We assigned people to deciles 1-10 regardless of which country they were living in at the time of the offence.

In this report, we identified which deciles each FPN recipient was resident in at the time of each individual offence. For analysis based on all FPNs, individual FPN recipients were counted multiple times; however, they may not have been residing in the same LSOA each time (as they may have moved address between offences). For analysis based on FPN recipients, the LSOA relating to the address that they were living in at the time of their first offence was used. In the majority of cases, repeat FPN recipients were living in the same LSOA at the time of all offences.

It is important to remember that IMD and WIMD are measures of area deprivation, and so they do not provide any information about the income level or economic circumstances of the FPN recipients themselves. Nevertheless, area-based measures do provide a useful proxy for socio-economic stress.

## Annex 3. Regulations and offences used in the analysis

### England

#### Health Protection (Coronavirus, Restrictions) (England) Regulations 2020 Commenced 26 March 2020

Contravene requirement to not participate in an indoor gathering two or more people
Contravene requirement as to restriction of movement during emergency period
Contravene requirement from a relevant person
Contravene requirement to not participate in a gathering in public of more than two people
Contravene requirement to not participate in a gathering of more than two people - dwelling/houseboat
Contravene requirement to not participate in an indoor gathering two or more people
Contravene requirement to not participate in an outdoor gathering of more than six people
Obstruct person carrying out a function under the regulations
Stay overnight other than at place of living / linked household, in England, without reasonable excuse.

In July 2020, the first national 'lockdown easing' (No. 2) revoked and replaced the initial national 'lockdown' Regulations.

#### The Health Protection (Coronavirus Restrictions) (no.2) (England) Regulations 2020 Commenced 4 July 2020

Contravene a direction or fail to comply with instruction
Contravene requirement from a relevant person
Contravene requirement not to hold, or be involved in holding, a gathering of more than thirty people - dwelling/houseboat
Contravene requirement not to hold, or be involved in holding, a gathering of more than thirty people - indoor amplified music
Contravene requirement not to hold, or be involved in holding, a gathering of more than thirty people – land (certain public outdoor spaces)
Contravene requirement to not participate in a gathering in public of more than two people
Contravene requirement to not participate in a gathering of more than six people
Contravene requirement to not participate in a gathering of more than thirty people - dwelling/houseboat
Contravene requirement to not participate in a gathering of more than thirty people – land (certain public outdoor spaces)
Contravene requirement to not participate in a gathering of more than two people - dwelling/houseboat
Contravene requirement to not participate in a gathering of two or more persons in the protected area
Contravene requirement to not participate in an indoor gathering two or more people
Contravene requirement to not participate in an outdoor gathering of more than six people
Entry into and/or remaining in a restricted area
Failure to restrict access to a restricted area
Obstruct person carrying out a function under the regulations – Coronavirus
Stay overnight other than at place of living / linked household, in England, without reasonable excuse.

In October 2020 policy in England switched to three 'tiers' of restrictions (with parts of the country being placed in and moved between them). This also revoked earlier legislation imposing local restrictions in Leicester and various parts of northern England.

## **The Health Protection (Coronavirus Local COVID-19 Alert Level) (High) (England) Regulations 2020. Commenced 14 October 2020**

Contravene a reasonable instruction given by a relevant person

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Contravene a requirement imposed, or a direction given, by a relevant person

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Contravene a Tier 2 restriction

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Contravene requirement that no person living in a Tier 2 area may participate in a gathering outside the restricted area which consists of two or more people indoors

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Contravene requirement to not participate in a gathering indoors in a Tier 2 area of two or more people

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Contravene requirement to not participate in an indoor gathering of two or more people

---

Obstruct person carrying out function under the regulations

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## **The Health Protection (Coronavirus Local COVID-19 Alert Level) (Medium) (England) Regulations 2020. Commenced 14 October 2020**

Contravene a reasonable instruction given by a relevant person

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Contravene a requirement imposed, or a direction given, by a relevant person

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Contravene a Tier 1 Restriction

---

Contravene requirement not to hold, or be involved in holding, a gathering of more than thirty people - dwelling/houseboat

---

Contravene requirement to not participate in a gathering in a Tier 1 area of more than six people

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Contravene requirement to not participate in a gathering in the Tier 3 area of two or more people - private dwelling/any indoor space

---

Contravene requirement to not participate in a gathering indoors in a Tier 2 area of two or more people

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Obstruct person carrying out function under the regulations

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## **The Health Protection (Coronavirus Local COVID-19 Alert Level) (Very High) (England) Regulations 2020. Commenced 14 October 2014**

Contravene a reasonable instruction given by a relevant person

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Contravene a requirement imposed, or a direction given, by a relevant person

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Contravene a requirement to not participate in a gathering in a relevant public outdoor place in the Tier 3 area of more than six people

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Contravene a requirement/direction/instruction from a relevant person

---

Contravene a Tier 3 Restriction

---

Contravene requirement from a relevant person – Coronavirus

---

Contravene requirement not to hold, or be involved in holding, a gathering of more than thirty people - indoor amplified music

---

Contravene requirement that no person living in a Tier 3 area may participate in a gathering outside the restricted area which consists of two or more people - private dwelling/any indoor space

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Contravene requirement to not participate in a gathering in any other outdoor place in the Tier 3 area of two or more people

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Contravene requirement to not participate in a gathering indoors in a Tier 2 area of two or more people

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Contravene requirement to not participate in an indoor gathering of two or more people

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At the end of October 2020, policy changed to a second England-wide 'lockdown'. The second national 'lockdown' legislation (No. 4) revoked the three sets of initial 'tier' Regulations.



## **The Health Protection (Coronavirus Restrictions) (no.4) (England) Regulations 2020 Commenced 5 November 2020**

Contravene a direction or fail to comply with instruction

Contravene a reasonable instruction given by a relevant person

Contravene a requirement imposed, or a direction given, by a relevant person

Contravene a requirement to not participate in a gathering in the Tier 4 area of two or more people - private dwelling/any indoor space

Contravene a requirement/direction/instruction from a relevant person

Contravene a Tier 3 Restriction

Contravene requirement that no person living in a Tier 4 area may participate in a gathering outside the restricted area which consists of two or more people - private dwelling/any indoor space

Contravene requirement to not leave or be outside of place of living

Contravene requirement to not participate in a gathering in the Tier 3 area of two or more people - private dwelling/any indoor space

Contravene requirement to not participate in a gathering indoors in a Tier 2 area of two or more people

Contravene requirement to not participate in a gathering of more than two people in public outdoor place

Contravene requirement to not participate in a gathering of two or more people in other outdoor space

Contravene requirement to not participate in an indoor gathering of two or more people

Obstruct person carrying out function under the regulations

In late November 2020, policy evolved to replace the second national 'lockdown' with an amended 'tier' system. The (All Tiers) Regulations 2020, laid on 30 November, revoked the second national 'lockdown'.

## **The Health Protection (Coronavirus Restrictions) (All Tiers) (England) Regulations 2020 Commenced 2 December 2020**

Contravene a direction to leave the embarkation point without leaving the United Kingdom

Contravene a reasonable instruction given by a relevant person

Contravene a requirement imposed, or a direction given, by a relevant person

Contravene a requirement to not participate in a gathering in a relevant public outdoor place in the Tier 3 area of more than six people

Contravene a requirement to not participate in a gathering in a specified outdoor place in the Tier 4 area of more than two people

Contravene Requirement to not participate in a gathering in the Tier 4 area of two or more people - private dwelling/any indoor space

Contravene a requirement/direction/instruction from a relevant person

Contravene a Tier 1 Restriction

Contravene requirement as to restriction of movement during emergency period

Contravene requirement from a relevant person

Contravene requirement not to hold, or be involved in holding, a gathering of more than thirty people - indoor amplified music

Contravene requirement that no person living in a Tier 2 area may participate in a gathering outside the restricted area of more than six people outdoors

Contravene requirement that no person living in a Tier 2 area may participate in a gathering outside the restricted area which consists of two or more people indoors

Contravene requirement that no person living in a Tier 3 area may participate in a gathering outside the restricted area which consists of two or more people in any other outdoor place

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Contravene requirement that no person living in a Tier 3 area may participate in a gathering outside the restricted area which consists of more than six people in a relevant public outdoor place

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Contravene requirement that no person living in a Tier 3 area may participate in a gathering outside the restricted area which consists of two or more people - private dwelling/any indoor space

---

Contravene requirement that no person living in a Tier 4 area may participate in a gathering outside the restricted area which consists of more than two people in a specified outdoor place

---

Contravene requirement that no person living in a Tier 4 area may participate in a gathering outside the restricted area which consists of two or more people - private dwelling/any indoor space

---

Contravene requirement that no person living in a Tier 4 area may participate in a gathering outside the restricted area which consists of two or more people in any other outdoor place

---

Contravene requirement to not leave or be outside of place of living

---

Contravene requirement to not participate in a gathering in a Tier 1 area of more than six people

---

Contravene requirement to not participate in a gathering in any other outdoor place in the Tier 3 area of two or more people

---

Contravene requirement to not participate in a gathering in the Tier 3 area of two or more people - private dwelling/any indoor space

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Contravene requirement to not participate in a gathering indoors in a Tier 2 area of two or more people

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Contravene requirement to not participate in a gathering of more than 15 people - educational accommodation

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Contravene requirement to not participate in a gathering of more than 15 people - indoor amplified music

---

Contravene requirement to not participate in a gathering of more than 15 people - private dwelling

---

Contravene requirement to not participate in a gathering of more than two people in public outdoor place

---

Contravene requirement to not participate in a gathering of two or more people in other outdoor space

---

Contravene requirement to not participate in a gathering of two or more persons in the protected area

---

Contravene requirement to not participate in a gathering outdoors in a Tier 2 area of more than six people

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Contravene requirement to not participate in an indoor gathering of two or more people

---

Contravene requirement to not participate in an indoor gathering two or more people - Coronavirus

---

Entry into and/or remaining in a restricted area

---

Obstruct person carrying out a function under the regulations – Coronavirus

---

Obstruct person carrying out function under the regulations

---

Contravene a requirement to not participate in a gathering in any other outdoor place in the Tier 4 area of two or more people

---

Contravene a requirement to not participate in a gathering in the Tier 4 area of two or more people - private dwelling/any indoor space

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In March 2021, the Steps restrictions replaced the Tier system. On implementation the whole of England was placed in the Step 1 area

### **The Health Protection (Coronavirus, Restrictions) (Steps) (England) Regulations 2021 Commenced 29 March 2021**

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Contravene a reasonable instruction given by a relevant person

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Contravene a requirement imposed, or a direction given, by a relevant person

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Contravene a requirement not to leave England to travel to a destination outside the United Kingdom

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Contravene a requirement to not participate in an indoor gathering in the Step 3 area of more than six people

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Contravene a requirement to not participate in an outdoor gathering in the Step 3 area of more than thirty people

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Contravene requirement to have a completed travel declaration form at an embarkation point

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Contravene requirement to not participate in a gathering of more than 15 people - educational accommodation

---

Contravene requirement to not participate in a gathering of more than 15 people - indoor amplified music

---

Contravene requirement to not participate in a gathering of more than 15 people - private dwelling

Contravene requirement to not participate in an indoor gathering in the Step 1 area of two or more people
Contravene requirement to not participate in an indoor gathering in the Step 2 area of two or more people
Contravene requirement to not participate in an indoor gathering of more than 15 people - educational accommodation
Contravene requirement to not participate in an indoor gathering of more than 15 people - indoor amplified music
Contravene requirement to not participate in an indoor gathering of more than 15 people - private dwelling
Contravene requirement to not participate in an outdoor gathering in the Step 1 area of more than six people
Contravene requirement to not participate in an outdoor gathering in the Step 2 area of more than six people
Obstruct person carrying out function under the regulations
Contravene a requirement to not participate in an outdoor gathering in the Step 2 area of more than six people

## Wales

### **The Health Protection (Coronavirus Restrictions) (Wales) Regulations 2020. Commenced 26 March 2020**

Contravene a direction or fail to comply with instruction
Contravene requirement as to restriction of movement during emergency period
Contravene requirement from a relevant person
Contravene requirement to not participate in a gathering in public of more than two people
Obstruct person carrying out a function under the regulation

### **The Health Protection (Coronavirus Restrictions) (No. 2) (Wales) Regulations 2020 Commenced 20 July 2020**

Contravene a direction or fail to comply with instruction
Contravene requirement as to restriction of movement during emergency period
Contravene requirement to not participate in a gathering in private
Contravene requirement to not participate in a gathering in public of more than two people
Contravene requirement to not participate in a gathering of more than thirty people
Contravene requirement to not participate in an indoor gathering of two or more people
Enter/Remain in a local health protection area in Wales without reasonable excuse
Leave or remain away from place when living in local health protection area in Wales without reasonable excuse

### **The Health Protection (Coronavirus Restrictions) (No. 3) (Wales) Regulations 2020 Commenced 23 October 2020**

Contravene a direction or fail to comply with instruction
Contravene requirement as to restriction of movement during emergency period
Contravene requirement to not participate in a gathering in private
Contravene requirement to not participate in a gathering in public of more than two people
Contravene requirement to not participate in a gathering of more than thirty people
Enter/Remain in a local health protection area in Wales without reasonable excuse
Leave or remain away from place when living in local health protection area in Wales without reasonable excuse
Obstruct person carrying out a function under the regulation

## **The Health Protection (Coronavirus Restrictions) (No. 4) (Wales) Regulations 2020 Commenced 9 November 2020**

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Contravene a direction or fail to comply with instruction
Contravene a requirement not to be involved in organising an indoor event of more than 15 people
Contravene a requirement not to be involved in organising an outdoor event of more than 30 people
Contravene a requirement not to participate in a gathering in a private dwelling consisting of more than 15 people
Contravene a requirement not to participate in a gathering in a private dwelling with any other person apart from the household or extended household
Contravene a requirement not to participate in a gathering outside of a private dwelling that consists of more than 4 people
Contravene requirement to not participate in a gathering in private
Contravene requirement to not participate in an indoor gathering of two or more people
Contravene restriction that no person living in Wales may leave Wales without a reasonable excuse
Contravene restriction that no person living outside Wales may enter or remain in Wales without a reasonable excuse
Enter/Remain in a local health protection area in Wales without reasonable excuse

## **The Health Protection (Coronavirus Restrictions) (No. 5) (Wales) Regulations 2020 Commenced 20 December 2020**

---

Contravene a direction or fail to comply with instruction
Contravene a requirement not to be involved in organising an indoor event of more than 15 people
Contravene a requirement not to be involved in organising an outdoor event of more than 30 people
Contravene a requirement not to participate in a gathering in a private dwelling consisting of more than 15 people
Contravene a requirement not to participate in a gathering in a private dwelling outdoors that consists of more than 4 people
Contravene a requirement not to participate in a gathering in a private dwelling which consists of more than 6 people
Contravene a requirement not to participate in a gathering in a private dwelling with any other person apart from the household or extended household
Contravene a requirement not to participate in a gathering outside of a private dwelling that consists of more than 4 people
Contravene a requirement that no person may leave the place where they are living
Contravene requirement to not participate in a gathering in private
Contravene requirement to not participate in a gathering in public
Contravene requirement to not participate in an indoor gathering of two or more people
Contravene restriction that no person living in Wales may leave Wales without a reasonable excuse
Contravene restriction that no person living outside Wales may enter or remain in Wales without a reasonable excuse
Enter/Remain in a local health protection area in Wales without reasonable excuse
Leave or remain away from place when living in local health protection area in Wales without reasonable excuse
Obstruct person carrying out a function under the regulation

## Annex 4. Annual Population Survey estimates 2020

### Annual Population Survey estimates for England and Wales (age 18+), March 2020

Table A1. Annual Population Survey population estimates, by age and sex

Age-group	Number for England		Number for Wales	
	Male	Female	Male	Female
18-24	2,353,447	2,255,675	143,112	131,031
25-34	3,822,934	3,773,904	189,894	181,602
35-44	3,537,137	3,585,974	168,074	184,190
45-54	3,716,436	3,825,184	204,541	212,500
55-64	3,325,267	3,453,794	208,578	210,214
65+	4,650,192	5,375,222	303,538	349,566
<b>Total by sex</b>	<b>21,405,413</b>	<b>22,269,753</b>	<b>1,217,737</b>	<b>1,269,103</b>
<b>Total All</b>		<b>43,675,166</b>		<b>2,486,840</b>

Table A2. Annual Population Survey population estimates for England and Wales, by age, sex and ethnicity

	England		Wales	
	Male	Female	Male	Female
<b>White</b>				
18-24	1,889,494	1,796,361	133,107	120,480
25-34	3,187,328	3,049,399	179,084	170,041
35-44	2,829,197	2,795,470	156,430	170,156
45-54	3,181,280	3,259,527	195,289	203,470
55-64	3,030,849	3,127,438	202,294	206,003
65+	4,423,768	5,101,646	300,166	347,466
<b>Total white</b>		<b>37,671,757</b>		<b>2,383,986</b>
<b>Ethnic minority</b>				
18-24	463,953	459,314	10,005	10,551
25-34	635,606	724,505	10,810	11,561
35-44	707,940	790,504	11,644	14,034
45-54	535,156	565,657	9,252	9,030
55-64	294,418	326,356	6,284	4,211
65+	226,424	273,576	3,372	2,100
<b>Total ethnic minority</b>		<b>6,003,409</b>		<b>102,854</b>
<b>All ethnic groups (age 18+)</b>				
White	18,541,916	19,129,841	1,166,370	1,217,616
Black	632,725	808,596	9,787	7,963
Asian	1,596,307	1,660,652	25,216	26,283
Mixed	233,493	261,783	7,407	7,921
Other	400,972	408,881	8,957	9,320
<b>Total All</b>		<b>43,675,166</b>		<b>2,486,840</b>

## Annex 5. Additional data tables

**Table A. 1 Number and rate of FPNs issued by Police Force Area (PFA), 27 March 2020 to 31 May 2021, England and Wales**

	Total FPNs issued	Rate of FPNs issued per 10,000 PFA residents	Total FPN recipients	Rate of FPN recipients per 10,000 PFA residents	PFA population size (000s)
Avon and Somerset Constabulary	2,139	12.7	2,017	12.0	1,683
Bedfordshire Police	1,033	15.6	990	15.0	662
Cambridgeshire Constabulary	1,030	12.2	991	11.8	841
Cheshire Constabulary	1,878	17.9	1,749	16.7	1,050
City of London Police	402	-	395	-	-
Cleveland Police	560	9.9	514	9.1	564
Cumbria Constabulary	1,738	35.0	1,654	33.3	497
Derbyshire Constabulary	2,075	19.9	1,998	19.2	1,041
Devon and Cornwall Police	2,737	15.9	2,665	15.4	1,726
Dorset Police	1,670	21.8	1,618	21.2	765
Durham Constabulary	1,170	18.7	1,080	17.2	627
Essex Police	1,501	8.3	1,456	8.1	1,806
Gloucestershire Constabulary	698	11.2	667	10.7	621
Greater Manchester Police	4,837	17.4	4,746	17.0	2,784
Hampshire Constabulary	2,791	14.2	2,632	13.4	1,968
Hertfordshire Constabulary	1,151	9.8	1,109	9.4	1,179
Humberside Police	657	7.1	615	6.6	929
Kent Police	2,633	14.5	2,520	13.9	1,815
Lancashire Constabulary	4,483	30.4	4,250	28.8	1,476
Leicestershire Police	3,091	29.1	2,919	27.4	1,064
Lincolnshire Police	1,016	13.7	954	12.8	744
Merseyside Police	6,750	47.9	6,170	43.8	1,410
Metropolitan Police Service	17,255	19.7	16,786	19.2	8,763
Norfolk Constabulary	1,925	21.7	1,808	20.4	888
North Yorkshire Police	4,048	49.4	3,805	46.5	819
Northamptonshire Police	2,904	39.7	2,750	37.6	731
Northumbria Police	6,522	45.2	6,206	43.0	1,444
Nottinghamshire Police	3,313	29.3	3,145	27.9	1,129
South Yorkshire Police	3,678	26.5	3,589	25.9	1,387
Staffordshire Police	1,929	17.3	1,873	16.8	1,118
Suffolk Constabulary	1,134	15.2	1,062	14.2	747
Surrey Police	1,845	15.7	1,795	15.3	1,174
Sussex Police	2,393	14.3	1,339	8.0	1,679
Thames Valley Police	3,139	13.2	2,997	12.6	2,376
Warwickshire Police	1,284	23.1	1,251	22.5	557
West Mercia Police	2,399	19.1	2,317	18.4	1,259
West Midlands Police	4,509	7.8	4,241	7.3	5,812

West Yorkshire Police	5,371	23.4	4,838	21.1	2,293
Wiltshire Police	813	11.5	750	10.6	710
<b>Total England</b>	<b>110,501</b>	<b>20.0</b>	<b>104,261</b>	<b>18.9</b>	<b>55,268</b>
Dyfed-Powys Police	2,274	44.0	2,201	42.6	517
Gwent Police	1,247	21.4	1,172	20.1	584
North Wales Police	3,128	45.2	3,052	44.1	692
South Wales Police	5,356	40.6	5,110	38.8	1,318
<b>Total Wales</b>	<b>12,005</b>	<b>38.6</b>	<b>11,535</b>	<b>37.1</b>	<b>3113</b>
<b>Total England &amp; Wales</b>	<b>122,506</b>	<b>21.0</b>	<b>115,796</b>	<b>19.8</b>	<b>58,381</b>

Notes: PFA population figures are provided by the Home Office

No population data are provided for City of London.

The total for England and Wales by issuing PFA does not match the total for England and Wales separately, due to Gwent Police issuing an FPN in England under English Regs (which was later cancelled).

**Table A. 2 Number and rate of FPNs issued by Police Force Area (PFA) by period, England and Wales**

	Period 1		Period 2		Period 3	
	Total FPNs issued	Rate of FPNs issued per 10,000 PFA residents	Total FPNs issued	Rate of FPNs issued per 10,000 PFA residents	Total FPNs issued	Rate of FPNs issued per 10,000 PFA residents
Avon and Somerset Constabulary	363	2.2	320	1.9	1,455	8.6
Bedfordshire Police	302	4.6	63	1.0	663	10.0
Cambridgeshire Constabulary	157	1.9	146	1.7	726	8.6
Cheshire Constabulary	206	2.0	268	2.6	1,399	13.3
City of London Police	70		20		312	
Cleveland Police	318	5.6	22	0.4	220	3.9
Cumbria Constabulary	767	15.4	231	4.6	740	14.9
Derbyshire Constabulary	266	2.6	95	0.9	1,708	16.4
Devon and Cornwall Police	1,042	6.0	305	1.8	1,387	8.0
Dorset Police	856	11.2	245	3.2	567	7.4
Durham Constabulary	182	2.9	82	1.3	905	14.4
Essex Police	252	1.4	332	1.8	916	5.1
Gloucestershire Constabulary	239	3.8	66	1.1	393	6.3
Greater Manchester Police	359	1.3	1,636	5.9	2,839	10.2
Hampshire Constabulary	292	1.5	361	1.8	2,132	10.8
Hertfordshire Constabulary	302	2.6	132	1.1	716	6.1
Humberside Police	141	1.5	87	0.9	429	4.6
Kent Police	133	0.7	213	1.2	2,286	12.6
Lancashire Constabulary	795	5.4	657	4.5	3,028	20.5
Leicestershire Police	398	3.7	352	3.3	2,340	22.0
Lincolnshire Police	250	3.4	172	2.3	592	8.0
Merseyside Police	526	3.7	917	6.5	5,298	37.6
Metropolitan Police Service	1,219	1.4	1,793	2.0	14,225	16.2

Norfolk Constabulary	413	4.7	80	0.9	1,432	16.1
North Yorkshire Police	1,185	14.5	590	7.2	2,273	27.8
Northamptonshire Police	388	5.3	472	6.5	2,043	27.9
Northumbria Police	283	2.0	3,071	21.3	3,162	21.9
Nottinghamshire Police	191	1.7	979	8.7	2,121	18.8
South Yorkshire Police	420	3.0	980	7.1	2,275	16.4
Staffordshire Police	54	0.5	542	4.8	1,333	11.9
Suffolk Constabulary	278	3.7	106	1.4	750	10.0
Surrey Police	525	4.5	68	0.6	1,252	10.7
Sussex Police	939	5.6	85	0.5	1,369	8.2
Thames Valley Police	938	3.9	230	1.0	1,961	8.3
Warwickshire Police	61	1.1	476	8.5	747	13.4
West Mercia Police	181	1.4	518	4.1	1,699	13.5
West Midlands Police	509	0.9	942	1.6	3,034	5.2
West Yorkshire Police	818	3.6	416	1.8	4,119	18.0
Wiltshire Police	200	2.8	46	0.6	567	8.0
<b>Total England</b>	<b>16,818</b>	<b>3.0</b>	<b>18,117</b>	<b>3.3</b>	<b>75,413</b>	<b>13.6</b>
Dyfed-Powys Police	1,825	35.3	104	2.0	344	6.7
Gwent Police	134	2.3	226	3.9	885	15.2
North Wales Police	480	6.9	270	3.9	2,372	34.3
South Wales Police	323	2.5	916	6.9	4,111	31.2
<b>Total Wales</b>	<b>2,762</b>	<b>8.9</b>	<b>1,516</b>	<b>4.9</b>	<b>7,712</b>	<b>24.8</b>
<b>Total England &amp; Wales</b>	<b>19,580</b>	<b>3.4</b>	<b>19,633</b>	<b>3.4</b>	<b>83,125</b>	<b>14.2</b>

**Table A. 3 Number of FPNs issued under each Regulation**

	England	Wales	Total
The Health Protection (Coronavirus Local COVID-19 Alert Level) (High) (England) Regulations 2020	1,803	NA	1,803
The Health Protection (Coronavirus Local COVID-19 Alert Level) (Medium) (England) Regulations 2020	547	NA	547
The Health Protection (Coronavirus Local COVID-19 Alert Level) (Very High) (England) Regulations 2020	751	NA	751
The Health Protection (Coronavirus Restrictions) (All Tiers) (England) Regulations 2020	76,812	NA	76,812
The Health Protection (Coronavirus Restrictions) (England) Regulations 2020	16,833	NA	16,833
The Health Protection (Coronavirus Restrictions) (No. 2) (Wales) Regulations 2020	NA	176	176
The Health Protection (Coronavirus Restrictions) (No. 3) (Wales) Regulations 2020	NA	288	288
The Health Protection (Coronavirus Restrictions) (No. 4) (Wales) Regulations 2020	NA	659	659
The Health Protection (Coronavirus Restrictions) (No. 5) (Wales) Regulations 2020	NA	8,107	8,107
The Health Protection (Coronavirus Restrictions) (no.2) (England) Regulations 2020	642	NA	642
The Health Protection (Coronavirus Restrictions) (no.4) (England) Regulations 2020	7,894	NA	7,894
The Health Protection (Coronavirus Restrictions) (Wales) Regulations 2020	NA	2,774	2,774
The Health Protection (Coronavirus, Restrictions) (Steps) (England) Regulations 2021	5,181	NA	5,181



<b>Total</b>	<b>110,502</b>	<b>12,004</b>	<b>122,506</b>
Missing	39	0	39

**Table A. 4 Percentage of FPNs recipients by IMD/WIMD, by lockdown period, England and Wales**

IMD/WIMD decile	Phase 1		Phase 2		Phase 3	
	England	Wales	England	Wales	England	Wales
1	23.9%	19.6%	20.7%	17.1%	20.0%	18.0%
2	16.4%	15.5%	14.8%	14.0%	16.4%	12.5%
3	13.7%	13.5%	12.2%	13.1%	14.0%	10.8%
4	11.2%	11.7%	11.1%	11.7%	11.5%	10.7%
5	8.8%	10.1%	9.0%	13.8%	9.3%	12.4%
6	7.6%	8.0%	7.4%	6.5%	7.7%	8.9%
7	5.6%	7.6%	6.4%	5.3%	6.4%	7.0%
8	5.0%	5.9%	6.4%	5.7%	5.9%	7.0%
9	4.6%	4.8%	6.6%	4.8%	4.8%	6.8%
10	3.3%	3.1%	5.4%	7.9%	4.1%	5.8%
Disparity Rate	7.24	6.32	3.83	2.16	4.88	3.10

**Table A. 5 Number, percentage and rate per 10,000 population of FPN recipients by period and age-group, England and Wales**

Age band	Period 1			Period 2			Period 3		
	Number	Percent	Rate per 10,000 people	Number	Percent	Rate per 10,000 people	Number	Percent	Rate per 10,000 people
<b>England</b>									
18-24	5,742	36.6%	12.5	9,205	52.7%	20.0	35,214	48.9%	76.4
25-34	5,086	32.5%	6.7	4,258	24.4%	5.6	20,440	28.4%	26.9
35-44	2,697	17.2%	3.8	2,166	12.4%	3.0	9,074	12.6%	12.7
45-54	1,458	9.3%	1.9	1,213	6.9%	1.6	4,729	6.6%	6.3
55-64	530	3.4%	0.8	482	2.8%	0.7	1,941	2.7%	2.9
65+	155	1.0%	0.2	158	0.9%	0.2	560	0.8%	0.6
<b>Wales</b>									
18-24	798	30.0%	29.1	730	49.3%	26.6	3,804	51.3%	138.8
25-34	869	32.7%	23.4	376	25.4%	10.1	1,870	25.2%	50.3
35-44	533	20.0%	15.1	206	13.9%	5.8	894	12.1%	25.4
45-54	272	10.2%	6.5	102	6.9%	2.4	496	6.7%	11.9
55+	138	5.2%	3.3	49	3.3%	1.2	266	3.6%	6.4

**Table A. 6 Age breakdown of FPNs issued by ethnic group, by lockdown period, England and Wales**

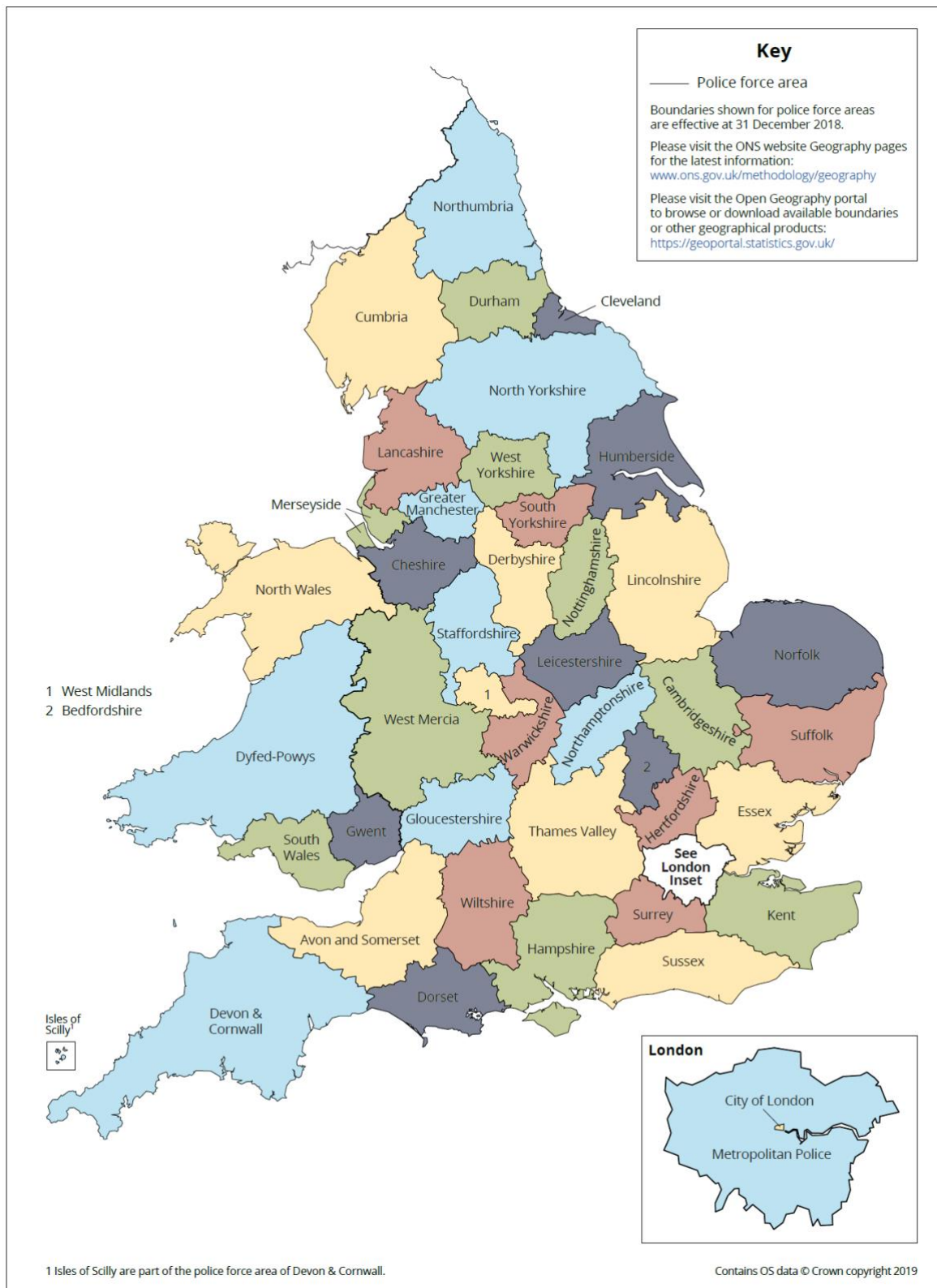
	England		Wales	
	White	Ethnic minority	White	Ethnic minority
<b>Period 1</b>				
18-24	26.3%	10.7%	25.0%	5.0%
25-34	24.6%	7.5%	27.0%	5.7%
35-44	13.9%	3.2%	16.1%	3.8%
45+	12.1%	1.7%	16.1%	1.3%
<b>Total (All)</b>		100.0%		100.0%
<b>Period 2</b>				
18-24	42.5%	10.2%	45.8%	3.5%
25-34	18.4%	6.0%	22.4%	3.0%
35-44	9.4%	2.9%	13.3%	0.7%
45+	8.5%	2.2%	10.3%	1.0%
<b>Total (All)</b>		100.0%		100.0%
<b>Period 3</b>				
18-24	34.4%	14.6%	46.5%	4.9%
25-34	19.8%	8.6%	22.8%	2.5%
35-44	9.2%	3.4%	10.8%	1.2%
45+	7.5%	2.5%	10.5%	0.8%
<b>Total (All)</b>		100%		100.0%

**Table A. 7 Percentage of cancelled or withdrawn FPNs by PFA of issue and period, 27 March 2020 to 31 May 2021**

Police Force Area in which FPN was issued	Period 1	Period 2	Period 3
<b>England</b>			
Humberside Police	0.0%	4.6%	1.9%
Lancashire Constabulary	1.0%	0.9%	1.4%
Dorset Police	1.4%	5.3%	2.8%
Warwickshire Police	1.6%	0.8%	1.2%
Northumbria Police	2.1%	4.4%	2.8%
Durham Constabulary	2.2%	17.1%	11.3%
Gloucestershire Constabulary	2.9%	10.6%	2.3%
Norfolk Constabulary	2.9%	8.8%	3.3%
North Yorkshire Police	3.0%	2.0%	0.8%
Avon and Somerset Constabulary	3.3%	5.0%	0.9%
Devon and Cornwall Police	3.5%	2.6%	2.8%
Surrey Police	4.0%	5.9%	2.9%

City of London Police	4.3%	20.0%	9.0%
Cheshire Constabulary	4.4%	8.6%	11.7%
Northamptonshire Police	4.6%	4.9%	8.0%
Nottinghamshire Police	4.7%	9.0%	8.0%
Metropolitan Police Service	4.8%	4.3%	2.2%
Kent Police	5.3%	8.0%	5.5%
Derbyshire Constabulary	5.6%	5.3%	1.7%
Essex Police	5.6%	6.9%	5.7%
Lincolnshire Police	5.6%	17.4%	7.1%
Cleveland Police	5.7%	31.8%	15.5%
Cumbria Constabulary	5.7%	9.5%	7.6%
Suffolk Constabulary	5.8%	2.8%	3.3%
Sussex Police	6.9%	1.2%	3.1%
Bedfordshire Police	7.0%	28.6%	12.7%
Wiltshire Police	7.0%	2.2%	7.1%
West Mercia Police	7.2%	6.4%	2.9%
Leicestershire Police	7.3%	3.1%	4.4%
Merseyside Police	7.6%	6.5%	4.8%
West Yorkshire Police	9.0%	11.3%	6.8%
Hertfordshire Constabulary	9.9%	24.2%	3.5%
South Yorkshire Police	10.5%	5.3%	2.4%
Greater Manchester Police	12.5%	2.5%	2.6%
Cambridgeshire Constabulary	15.3%	19.2%	13.8%
Hampshire Constabulary	15.4%	4.7%	5.4%
Staffordshire Police	20.4%	3.1%	2.6%
Thames Valley Police	20.5%	3.5%	4.1%
West Midlands Police	27.9%	38.7%	17.6%
<b>Wales</b>			
North Wales Police	1.3%	1.9%	4.2%
Gwent Police	1.5%	1.3%	1.5%
Dyfed-Powys Police	5.6%	5.8%	2.3%
South Wales Police	5.6%	2.2%	1.5%

## Annex 6. Map of Police Force Areas, England and Wales (2018)



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This report was prepared by a group of academics working on the Policing the Pandemic in Scotland project, which is investigating the role of police enforcement in securing compliance with the Health Protection Regulations introduced as part of the response to the COVID-19 pandemic in Scotland.

**Project website:** [www.law.ed.ac.uk/research/research-projects/policing-the-pandemic](http://www.law.ed.ac.uk/research/research-projects/policing-the-pandemic)

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