

City of London Law Society

Corporate Crime & Corruption Committee

Minutes of Meeting 16 September 2025

(Held online only)

Attendees:

Louise Hodges (Chair)	Nick Barnard
Phil Taylor (Secretary to the Committee)	Pamela Reddy
Andrew Katzen	Ruby Hamid
Camilla da Silva	Rosanne Kay
Christina Franzese (alternate for Ali Sallaway)	Sarah Wallace
Eve Giles	Shruti Chandok
Laura Ford	Tom Epps
Matt Getz	

1. The Chair **welcomed** the attendees.
2. **Apologies** were received from Elly Proudlock, Ali Sallaway, Satnam Tumani, Kevin Hart, Neill Blundell, Alistair Graham, Matthew Banham, Justin McClelland, Christopher David and Jonathan Cotton. **Minutes of the previous meeting** had been circulated and amendments were invited within 24 hours.

The Secretary updated the Committee with regard to **actions from the previous meeting**:

- Liaison with the Secretariat of the Times Crime and Justice Commission has been postponed due to other urgent projects. An update will be given the Committee in due course.
- The Secretary has circulated a copy of the written response to the City of London Solicitor's Company as part of their support to the Lord Mayor's Office.
- The Chair will shortly be sending a welcome message to the recently appointed Chief Executive of the CLLS, and potentially inviting him to a Committee meeting.

3. **CLLS / Committee business**

- a. A member of the Law Reform / Legal Practice subcommittee presented an overview of the paper sent to the Lord Chancellor's Office **in response to Part I of Sir Brian Leveson's Review of the Criminal Courts**. The paper focused on three of the review's recommendations in particular: those relating to serious and complex fraud and partial removal of the right to trial by jury. Other recommendations made in the review are very wide ranging, and include introducing a new criminal court division to allow a higher volume of trials by judge alone.

A number of Members commented favourably on the paper. A Member asked what the next steps would be. The Chair explained that the paper had been sent with a covering letter, in which the Lord Chancellor was asked to take the Committee's points into consideration and made clear that the Committee is available should the Lord Chancellor require more information. The Chair also noted that Part II is due to be published shortly.

The Secretary noted that the paper is now available on the CLLS website and that public posts have been published on LinkedIn. The Chair further noted that Rt Hon David Lammy MP had recently been appointed as Lord Chancellor and Secretary of State for Justice, and highlighted his previous supportive comments in relation to jury trials. A Member noted that the Bar Council of England and Wales had also published a paper opposing the fraud proposals in the Leveson Review.

- *The Secretary to ensure the Committee is kept updated in relation to the Leveson Review.*
 - b. The Chair provided a high-level update on her attendance (in her own capacity) at a meeting to discuss Part II of the review being led by Jonathan Fisher KC, which is focused on fraud offences.
 - c. The Secretary noted that the Committee would be joined by a guest from the Insolvency Service at its **December meeting**, and that a Member has kindly offered to host this meeting. Details will be provided by email in due course.

4. Subcommittee business

- a. **AML / Sanctions:** A member of the subcommittee delivered updates on:
 - i. A further consultation on amendments to the Money Laundering Regulations
 - ii. Updated FCA guidance on the treatment of Politically Exposed Persons
 - iii. An event at which FCDO policies relating to sanctions were discussed
 - iv. A consultation on sanctions enforcement by OFSI
 - v. Relevant recent cases (including Shvidler, Vanquis Bank and Marcom)
- b. **Disclosure:** There were no updates.
- c. **Law Reform / Legal Practice:** There were no further updates, those already having been covered at item 2.
- d. **Events:** A member of the subcommittee reminded Members of the event aimed at junior white collar crime lawyers being held that evening which has been arranged in conjunction with the CLLS and a lawyer from Clifford Chance. Members should encourage suitable colleagues to

attend. The Chair would be attending the event along with a representative of the CLLS's retained public relations agency.

- *The Events subcommittee to provide feedback to the Committee after the event.*

5. Legal / Case updates:

- a. The Secretary reminded the Committee that the new corporate criminal offence of failure to prevent fraud is now in force and invited Members to share their experiences of client attitudes to this development. Members shared that:
 - i. Responses have been sector-dependent
 - ii. News of the first failure to prevent the facilitation of tax evasion offence may have increased awareness amongst some companies
 - iii. There has been a surprising level of enquiries from overseas firms, perhaps because of the extraterritorial element to the offence
 - iv. Competition from consultants, accounting firms, etc. is strong
 - b. The Secretary noted comments from the Chief Crown Prosecutor, as reported in the media, that a new five-year plan for tackling economic crime would be issued later in 2025.
6. There were no comments from Members on the standing item of **Investigation and & Interview Practices (including tech)**.
7. Under **further business**, a Member offered to connect the Chair with a representative of HMRC, with a view to inviting them to a future meeting. The Chair then called a close to the meeting with thanks to the Members for their contributions.