

**City of London Law Society**

**Corporate Crime Committee**

**Minutes of Meeting 20 May 2025**

**(Held as a hybrid meeting)**

**Attendees (in-person):**

Louise Hodges (Chair)	Jeremy Summers
Neill Blundell (Vice-Chair)	Matthew Banham
Phil Taylor (Secretary to the Committee)	Matthew Getz
Sandra Paul, Kingsley Napley LLP (Guest)	Sarah Wallace
Andrew Katzen	Satnam Tumani
Christopher David	Susannah Cogman
Hannah Laming	Tom Epps
Jonathan Cotton	

**Attendees (online):**

Ali Sallaway  
Daren Allen  
Ruby Hamid  
Sam Tate  
Shruti Chandhok

1. The Chair **welcomed** the attendees and noted that the Committee would also be welcoming Rt Hon Alex Chalk KC immediately after the meeting.
2. **Apologies** were received from Alistair Graham, Elly Proudlock, Kevin Hart, Michelle de Kluyver, Rosanne Kay and Virginia Salter. **Minutes of the previous meeting** had been circulated and amendments were invited within 24 hours.
3. **CLLS / Committee business**
  - a. The Chair drew Members' attention to an email from the CLLS Chair in which he asked the Committee to consider any issues to raise at a potential roundtable event involving government representatives. Members suggested and discussed a number of ideas including:
    - i. the government providing more support for potential overseas inbound investors, such as access to approved tools and a 'kite mark' system; and
    - ii. a focus on enforcement, through prosecution, of existing laws, enabled by more funding of key agencies.

- b. The Secretary noted a recent update email from the CLLS Chair including two specific points:
    - i. A new CLLS Chief Executive has been appointed and will take up the role in September 2025. The Chair agreed that the Committee should reach out to the new Chief Executive with an invitation to join future Committee meetings.
    - ii. U.S. Executive Orders and the CLLS's chosen approach: a Member offered assistance connecting the central CLLS with their own firm's team handling US matters; members shared comments around travelling to the US on business.
- *The Secretary to make note to contact the new Chief Executive once in post.*

#### 4. Subcommittee business

- a. **AML / Sanctions:** There were no updates.
- b. **Disclosure:** A Member briefly updated the Committee on Part I of the Fisher Report. The report is lengthy and in many ways advocates retaining the status quo. 'Keys to the warehouse' is ruled out. A key point is on AI; however, although difficulties with tech and AI are recognised, nothing is said about the SFO's well-known issues with its Autonomy system.
- c. **Law Reform / Legal Practice:**
  - i. A Member updated the Committee on the SFO's recently published corporate cooperation guidance, in particular comparing the Committee's submissions with the final version of the document. In summary, many of the Committee's submissions were accepted, including:
    - Avoiding use of the term 'corporate wrongdoing' or 'misconduct';
    - Including language indicating target timelines;
    - Defining the concept of 'forum shopping';
    - Clarifying the reference to "independence" of an investigation;
    - Including examples of 'exemplary cooperation';
    - Clarifying the SFO's approach to privilege; and
    - Many other small but important improvements.

Although not all comments were accepted by the SFO, a key takeaway for the Committee is that the exercise of commenting on the draft guidance was worth undertaking; the Committee should continue to engage on matters such as these, as its comments are taken seriously. The Chair extended her thanks to Members who were involved in the consultation process.

ii. The Chair raised a point on a clause of the Crime and Policing Bill (currently clause 165) which will widen the reform of corporate criminal liability to all offences. There was discussion around whether and how it could be argued that this expansion should not go ahead. A Member raised the concern that this could create competing regimes in areas (such as environmental regulation or data protection) where there are already compliance standards.

▪ *A working group to be convened to track this development.*

iii. A Member raised an additional point on a new report to be issued by Sir Brian Leveson in which it is possible that the abolition of jury trial for fraud offences will be recommended. The Member's view was strongly against this potential proposal: a key problem is the lack of investment in the criminal justice system and a lack of sitting days for judges which would not be solved by "intermediate courts" as judges will still need to be paid sit. The Member suggested the Committee should be ready and prepared to say comment on any forthcoming proposals. Another Member opined an opposing view, noting that many fraud trials amount mainly to "theatre for juries" and that the evidence is that trials are falling apart.

▪ *A working group to be convened to track this development.*

d. **Events:** A Member updated that planning for the next associates' round table event is underway and sits with a Senior Associate from a member firm. The event is planned to take place in the autumn.

5. In the interests of time, the Secretary deferred two points which had been planned under the **Legal / Case updates** agenda item to a follow-up email. The standing item of **Investigation and & Interview Practices (including tech)** was also omitted due to time constraints.

6. The Chair welcomed a Guest to speak about the **Times Crime and Justice Commission**. Points included:

- Being involved was rewarding and Members are encouraged to consider getting involved in similar initiatives.
- An important and fascinating part of the process was sitting around a table with senior leaders and stepping back from usual practice to think about the whole criminal justice system as an interconnected entity.
- It was interesting to see the sheer energy with which ex-politicians and judges could articulate what could be done, compared to what was actually achieved; there was discussion around how to take politics out of the criminal justice system.

- A number of recommendations were made in the Commission's report which are relevant to the Committee, such as whistleblower incentives, digital ID, and taking a common-sense approach to sentencing, such as dividing sentences into three parts (custody / home / supervision).
- The Times has a lot of influence and can get the attention of the same decision-makers who CLLS members will be interested to speak with.
- The topic of intermediate courts was a key one, and this is a conversation practitioners should be engaging in.
- Employing ex-offenders seems to be an easy way for businesses to meet ESG targets and it is not clear why more businesses are not doing this.

The Guest concluded by noting that the Commission's Secretariat is still in place and would be happy to connect the Committee with any relevant stakeholders.

- *A working group to be convened to take forward further liaison with the Secretariat of the Commission.*
7. There being **no further business**, the Chair called a close to the meeting with thanks to the Members for their contributions.