

City of London Law Society

Corporate Crime Committee

Minutes of Meeting 10 December 2024

(Held as a hybrid meeting)

Attendees (in-person):

Louise Hodges (Chair)	Eoin O'Shea
Neill Blundell (Vice-Chair)	Jeremy Summers
Phil Taylor (Secretary to the Committee)	Satnam Tumani
Elizabeth Head	
Andrew Katzen	

Attendees (online):

Nick Benwell	Pamela Reddy
Christopher David	Sarah Wallace
Ruby Hamid	
Kevin Hart (CLLS)	
Michelle de Kluywer	
Elly Proudlock	

1. The Chair **welcomed** the attendees and extended thanks to the Member representing the hosting firm.
2. **Apologies** were received from Susannah Cogman, Jonathan Cotton, Davina Given, Alistair Graham, Rosanne Kay, Virginia Salter. **Minutes of the previous meeting** had been circulated and amendments were invited within 24 hours.
3. **CLLS / Committee business**
 - a. The Chair began by confirming the meeting was quorate and introducing the **applications for Committee membership**. The Chair confirmed that all present had read the applications in advance and recommended all candidates for membership. Kevin Hart noted there were seven applications in total; however, two applicants would not yet be eligible for membership due to their firm's status as non-corporate members and the individuals' positions as employed barristers. Those members' applications would therefore not be voted on at present.

Each of the five remaining applications was considered in turn, and there being no objections to any, Kevin Hart confirmed that each applicant was duly elected to the Committee.

- *The Chair, with support from the Secretary, to write to the new members welcoming them to the Committee.*

4. **Legal / Case updates**

- a. The Secretary noted for the Committee's attention that that Chair of the **Independent Review of Disclosure and Fraud Offences**, Jonathan Fisher KC, had submitted his report 'Disclosure in the Digital Age' to the Home Secretary on 18 November 2024. Few details of the content of the report are known as yet, and there has been no further update on the timing of the government's response, or the status of the Part 2 of the review (fraud offences).

- *The Disclosure subcommittee to monitor the status of the Independent Review.*

- b. The Chair noted that Sara Lawson KC is to step down as General Counsel of the SFO; it is not clear yet whether there will be an interim General Counsel or when a new permanent General Counsel will be appointed. The SFO had been looking at revising and consolidating the **SFO's guidance for corporates**, published online. A meeting has been held to discuss the possible contents of the guidance, and a further meeting is scheduled shortly, which the Chair will attend. However, draft guidance has not yet been circulated by the SFO. If and when the draft guidance is provided, the Law Reform / Legal Updates subcommittee will be informed.

5. **Subcommittee business**

- a. **Law Reform / Legal Practice:** Members of the subcommittee provided a brief update on the recently published Guidance on Failure to Prevent Fraud. It appears that the Home Office has directly taken into account a number of elements of the Committee's input. It has been confirmed that the government will not be endorsing sectoral guidance for financial services.

The subcommittee is currently confirming whether and when the Guidance will be updated, and to what extent. This will inform the next steps to be taken by the Committee, which could include submitting informal feedback to the Home Office or publishing a paper in response to the Guidance.

- b. **AML / Sanctions:** There were no updates.

- c. **Disclosure:** There were no updates.

- d. **Events:** There were no updates.

6. The standing item of **Investigation and & Interview Practices (including tech)** was not considered due to time constraints.

7. There being **no further business**, the Chair called a close to the meeting with thanks to the Members for their contributions.

- *Members to take note of the dates of Committee meetings in 2025, as circulated with the Agenda.*