

Committee(s)	Dated:
Freedom Applications Committee – For Information	7 July 2016
Subject: Review of the Vetting Procedure for applicants to the City Freedom by Redemption without the Intervention of a Livery Company	Public
Report of: The Chamberlain	For Information
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Summary

The Committee has asked for a review of the vetting procedure introduced in April 2015 whereby candidates applying for the freedom were vetted prior to them attending an interview and to pay the fee. The intention was to protect the reputation of the City of London and to ensure that candidates who could cause potential embarrassment are not admitted.

Recommendation

It is **recommended** that the contents of this report are considered and discussed.

Main Report

1. The enhanced vetting procedure comprises of an online check under each applicant resulting in an additional tier to the process of applying for the freedom. The results of the checks are not disclosed to the applicant unless a problem is found and then the nominators are contacted. Each check is based on free online information in the public domain that may flag some of the following concerns, which seek to protect the reputation of the City of London:
 - Inappropriate or extremist personal views
 - Links or appointments to an organisation or company, with any improper history or bankruptcy
 - Links or membership the applicant may have to any inappropriate or extremist groups
 - Any impending court orders or arrests

A short pro forma of checks (shown below) is completed for each applicant with a maximum timeframe of 15 minutes per search. The search time is limited as it is possible to spend a lot of time accessing many links and webpages without certainty that they relate to the applicant, or that any useful information may be found.

Full Name:	
Address:	
Reference:	
Date Application Received by:	
Heard at Court Date:	
Search Date:	
Nominator Name 1:	
Nominator Name 2:	
Google – Name search:	
Google – Address search:	
Facebook:	
Twitter Advanced Search:	
Linkedin search using keywords:	
Disqualified Directorship - Companies House	
Issue(s) of concern:	
Other comments:	

A number of searches under each category above are performed until a match to the individual can be found or ruled out. Firstly, basic details such as name and address are searched via Google. In order to assist these searches, keywords found in the application form such as the applicants e-mail address, name of employer or occupation are used.

Under the category 'Google address searches' information is often found (based on registered addresses) on individuals company directorships or other company appointments. Once a company name has been obtained, searches are performed on the company which can provide a review of the company and its conduct. A search is also performed on the individual using the Companies House Disqualified Directorship database.

Social media accounts are included in the vetting search – Facebook, Twitter and LinkedIn (accounts found on other social media sites will be investigated if found via Google). Social media accounts are searched for in a variety of ways: firstly by using the social media websites own search tools which filter by various search criteria. If no matches are found, a secondary search is carried with Google using keywords. This can yield different results, or narrow the search. The intuition of the search user also aids the vetting process: e.g. an online image can be considered a likely fit to an individual by matching it against their age or occupation. Often, the same Images of an individual are displayed across more than one social media site, and this can also help to identify the applicant.

2. The advantages of the enhanced vetting procedure are as follows:
 - Potentially unsuitable candidates are spotted early in the process and not after they have been admitted to the Freedom
 - Enables an analysis of the background of candidates to be completed.
 - Protects the reputation of the City

- The knowledge that applicants are being vetted might make nominators less casual in their approach to nominating.
3. The following are observations on the experience of vetting carried out by the Chamberlain's Court staff some of which may be considered to be disadvantages:
- It is time consuming.
 - In a year only two potentially unsuitable cases have been identified out several hundred people vetted.
 - Any applicants guilty of wrong doing are likely to hide any record of this which can be done relatively easily on the internet.
 - Many candidates are mature in years and often do not have a presence on social media.
 - Common names can produce large numbers of results. First names provided on application forms are often not those used on social media.
 - Vetting is slowing down the application process; it takes longer to apply now what with the checking and then the submission of a monthly report to the Freedom Application Committee. This can have consequences if nominators want to put through a candidate speedily to coincide with a specific date for the ceremony.
 - The vetting process has generated a tier of extra administration.
 - There is no disciplinary process attached to nominating someone unsuitable. In the two cases so far regarding the case of industrial manslaughter the nominators speedily withdrew the application pending the result of Police inquiries. Regarding the second case of the Councillor being suspended from political activity for a year there continues to be correspondence about the unfair nature of the press report and how the Councillor resigned and then stood for re-election successfully.
 - Information on the internet can be incorrect or unreliable and the COL might find itself at the risk of bad publicity were we to delay a Freedom as a result of information that turned out to be incorrect.

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