

Committee(s)	Dated:
Freedom Applications Committee	27 November 2019
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 and the Town Clerk	For Information
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Summary

This report presents the current arrangements for the vetting of candidates applying for the Freedom. The vetting procedure was 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. The vetting procedure was last reviewed by the Freedom Applications Committee in July 2016, at which time it was resolved that the vetting procedure undertaken by the Committee and the enhanced investigations currently carried out by the Chamberlain's Court should continue; and that the Guidance for Members on the Freedom be recirculated to the Committee for information.

Recommendation

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

Main Report

1. The standard application form for Freedom of the City of London Applicants by Nomination sets out the procedure by which general applications (i.e. not Ward List or Patrimony applications) are considered. This includes a short paragraph on eligibility – individuals above the age of eighteen, who are not undischarged bankrupts, and who do not have any unspent convictions under the Rehabilitation of Offenders Act 1974. The application form also sets out eligibility and expectation of nominators, as well as stating that the City of London Corporation has absolute discretion to admit or refuse to admit an applicant, and that further information about the applicant may be sought from the nominators if deemed necessary.
2. The form also states that the application will go through a 'checking process' and that once this is completed, there is an application interview prior to the application being submitted to the Court of Common Council for formal approval.

3. Within the checking process referred to is the enhanced vetting procedure introduced in April 2015. This 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
4. 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 an individual's 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 website's 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.

5. 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.

6. 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.
- Since 2015 five potentially unsuitable cases have been identified arising from the enhanced vetting process, out of all candidates vetted.
- Any applicants guilty of wrongdoing 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 means that the application process takes longer. 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.
- Information on the internet can be incorrect or unreliable, and the City of London Corporation could 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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