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11 August 2025

Charity Commission for England and Wales

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Sent by Registered Post on 11 August 2025

Subject: **Governance Concern – HEPI Trustee Record Inaccuracy
and CC29 Non-Compliance**

1. About the Charity

Name: Higher Education Policy Institute (HEPI)

Charity Number: 1099645

Registered Address: 99 Banbury Road, Oxford, OX2 6JX

2. Summary of the Concern

I write further to my inquiry submitted to the Charity Commission on 4 August 2025 regarding the trusteeship of Sir David Robert Bell KCB DL at the Higher Education Policy Institute (HEPI).

This letter and its supporting evidence are also being published openly in the public interest to ensure transparency in matters affecting governance and regulatory compliance.

This follow-up sets out additional concerns arising from subsequent correspondence with HEPI's Director, Nicholas Hillman, and Chair, Professor Dame Sally Mapstone, which indicate wider governance issues.

I believe HEPI's trustees may be in **breach of their duties under the Charities Act 2011 and Charity Commission guidance CC29: Conflicts of Interest** by:

1. Allowing the public trustee register to display **inaccurate records** for nearly 11 months regarding former trustees Sir David Robert Bell KCB DL and Professor Dame Helen Wallace;
2. Failing to ensure that the register contains complete and up-to-date declarations of trustees' other charitable roles;
3. Acknowledging these gaps but taking corrective action only when challenged, and declining to support measures to address the underlying systemic issue.

These issues raise concerns about non-compliance with statutory obligations, potential mismanagement by trustees, and damage to public trust in the charity's governance.

3. Relevant Legal and Regulatory Duties

- **Charities Act 2011, s 60:** Trustees must ensure that information provided to the Commission is accurate and not misleading.
- **CC3: The Essential Trustee:** Trustees must keep their charity's details on the register up to date.
- **CC29: Conflicts of Interest:** Trustees must declare and record all other trusteeships and relevant interests, and ensure this information is accurate and accessible to maintain public trust.

4. Timeline of Events and Evidence

21 September 2024: According to HEPI's own Annual Report and correspondence from Director Nicholas Hillman, Sir David Bell and Professor Dame Helen Wallace's trusteeships both ended on this date after serving their maximum terms.

4–5 August 2025: Bell confirmed to me via email that he was no longer a trustee.

- 5 August 2025:** Official Charity Commission register still listed Bell and Wallace as current trustees, each with no recorded termination date.
- 7 August 2025:** In correspondence to me, Hillman conceded these entries were inaccurate and that he contacted the Commission that day to request corrections. He also acknowledged that the register does not reliably display all a trustee's other charitable roles — a shortcoming which, in HEPI's case, has left most trustees' role listings incomplete.
- 8 August 2025:** I wrote to HEPI Chair, Professor Dame Sally Mapstone, outlining my view that this constitutes a breach of CC29. I have given HEPI until 13 August 2025 to provide the outstanding governance records and correct all incomplete trustee disclosures.
- 11 August 2025:** Updated submission to the Charity Commission including expanded list of discrepancies and undeclared trusteeships.

5. Additional Discrepancies in Trusteeship Records

The discrepancies are not limited to Sir David Bell:

- **Professor Dame Helen Wallace** – Ended trusteeship 21 September 2024, still listed as current trustee on Charity Commission register as of 5 August 2025.
- **Professor Dame Julia Goodfellow** – Listed as having 'No other trusteeships' despite serving in senior roles in other organisations.
- **Professor Dame Sally Mapstone** – Listed as having 'No other trusteeships' despite being Principal of the University of St Andrews and a Universities UK board member.
- **Mary Curnock Cook CBE** – Listed as having 'No other trusteeships' despite chairing Pearson Education Ltd, the Dyson Institute, and holding board roles at the Student Loans Company, the Student Room, and Education Cubed.
- **Professor Sir Christopher Husbands** – Appointed 21 September 2024; not yet declared on the Charity Commission register.
- **Professor Nicholas Pearce** – Appointed 21 September 2024; not yet declared on the Charity Commission register.

These omissions directly contradict the duty under CC29 to declare and record all other trusteeships and relevant interests, and they mislead the public regarding the extent of trustees' governance commitments and potential conflicts of interest.

6. Why This is a Serious Regulatory Matter

- **Duration of inaccuracy:** Bell and Wallace's trusteeships ended in September 2024; the record was not corrected until August 2025, and only after my inquiries.
- **Incomplete declarations:** Multiple trustees' other charitable roles remain undeclared on the register, despite clear public evidence of those roles.
- **Trustee responsibility:** CC29 makes clear the onus is on trustees to maintain accurate, up-to-date records.
- **Public trust and influence:** HEPI is an influential think tank whose work is cited by policymakers, the media, and Parliament. Governance opacity in such an organisation undermines public confidence in its independence and integrity.

7. Evidence

I can provide:

- My original 4 August 2025 letter to the Commission regarding Sir David Bell's trusteeship;
- My formal letters to HEPI's Director and Chair;
- Email responses from Sir David Bell;
- Written admissions from Nicholas Hillman dated 7 August 2025 acknowledging the inaccurate records and incomplete role listings;
- Screenshots of the Charity Commission register (5 August 2025) showing the inaccuracies;
- Screenshots from HEPI's Annual Report listing Bell and Wallace as having ended their terms on 21 September 2024.

8. Requested Action

I ask the Commission to:

1. Investigate HEPI's compliance with CC29 and CC3 regarding accurate, up-to-date trustee records;
2. Ensure the public register reflects the full, correct list of trustees and their other charitable roles;
3. Consider whether this constitutes mismanagement or misconduct by the trustees;
4. Advise HEPI on steps to prevent recurrence and improve transparency.

I will provide the Commission with a further update after 13 August 2025 if the trustees fail to address the outstanding points set out in my correspondence to them.

Acknowledgement requested: Please confirm receipt of this letter and supporting evidence **within 5 working days of receipt**, and provide a case reference number for any investigation or compliance case opened as a result.

Submitted in good faith,

Peter Kahl (they / them)

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