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Evidence Brief – HEPI Trustee Record Inaccuracies, Undeclared Trusteeships & CC29 Non-Compliance

Dated: 11 August 2025

Continuation of Inquiry submitted to Charity Commission on 4 August 2025 regarding Sir David Robert Bell's trusteeship at the **Higher Education Policy Institute (HEPI)**.

Summary of Concern

HEPI trustees may have **breached duties under the Charities Act 2011 and Charity Commission guidance CC29: Conflicts of Interest** by:

- Allowing the Charity Commission register to carry **inaccurate trustee records** for nearly 11 months;
- **Failing to declare other charitable roles** held by trustees;
- Taking corrective action only after external challenge.

Key Timeline & Evidence

21 Sep 2024: Bell and Wallace end trusteeships (HEPI Annual Report & Hillman correspondence).

4–5 Aug 2025: Bell confirms via email he is no longer a trustee.

5 Aug 2025: Commission register still lists Bell & Wallace as current trustees, no end date.

7 Aug 2025: Hillman admits inaccuracies; says he contacted Commission to correct; acknowledges register does not list all other trusteeships.

8 Aug 2025: Letter to HEPI Chair Sally Mapstone outlining CC29 breach; deadline set for 13 Aug 2025 to correct & declare all interests.

11 Aug 2025: Updated submission to the Charity Commission including expanded list of discrepancies and undeclared trusteeships.

Key Admissions from HEPI Director (7 Aug 2025)

- Bell ceased as trustee 21 Sep 2024.
- Public record inaccurate for ~11 months; corrected only after challenge.
- Trustee entries incomplete, with missing other-charitable-role declarations.

Trusteeship Record Discrepancies

- **Prof Dame Helen Wallace** – Ended 21 Sep 2024; still listed as current trustee on 5 Aug 2025.
- **Prof Dame Julia Goodfellow** – ‘No other trusteeships’ listed despite senior roles in other organisations.
- **Prof Dame Sally Mapstone** – ‘No other trusteeships’ listed despite Principal, University of St Andrews & UUK board member.
- **Mary Curnock Cook CBE** – ‘No other trusteeships’ listed despite chairing Pearson Education Ltd, Dyson Institute & multiple board roles.
- **Prof Sir Christopher Husbands** – Appointed 21 Sep 2024; not declared on Commission register.
- **Prof Nicholas Pearce** – Appointed 21 Sep 2024; not declared on Commission register.

Relevant Legal Duties

- **Charities Act 2011, s 60** – Duty to ensure Commission records are accurate & not misleading.
- **CC3: The Essential Trustee** – Duty to keep public register up-to-date.
- **CC29: Conflicts of Interest** – Duty to declare and record all other trusteeships & relevant interests.

Public Interest & Risk

HEPI is an influential think tank cited in Parliament, policy, and media. **Prolonged inaccuracy and incomplete disclosures** undermine public trust, breach governance duties, and **conceal potential conflicts of interest**.

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