



Good Law Project
167-169 Great Portland Street
5th Floor
London
W1W 5PF
W: goodlawproject.org

Charity Commission for England and Wales
PO Box 211
Bootle
L20 7YX

By email to: [REDACTED]

12 May 2025

Re: Complaint about misconduct and/or mismanagement by the Trustees of Policy Exchange Limited (registered charity number 1096300)

Dear Charity Commission,

1. We refer to our complaint letter dated 29 October 2025 and your opening of a regulatory compliance case into Policy Exchange Limited ("**the Charity**"), announced on 13 November 2025.
2. At paragraph 3 of our complaint letter, we stated:

"... the Charity's true activities involve lobbying, influencing government policy, and publishing one-sided, partisan reports filled with 'policy recommendations'. We have seen no evidence that the Charity genuinely engages in the task of educating members of the public in a balanced way. All its activities seem to be directed towards policy-makers, politicians and journalists..."
3. Since we submitted our complaint, the Charity has continued engaging in precisely the same type of unlawful political, non-educational activity. This is obvious from its website, as well as e.g. its YouTube channel and its regular appearances on national TV and in the national press.
4. We are writing to highlight one particular matter of concern.

5. On 5 May 2026, two days before local elections in England and Parliamentary elections in Scotland and Wales, the Charity announced its 'Project 2029': <https://policyexchange.org.uk/project-2029/>.
6. The name 'Project 2029' is plainly a reference to 'Project 2025', a right-wing political initiative in the United States *"with the goal of reshaping the U.S. federal government by consolidating executive power in favo[u]r of right-wing policies... Critics have called it an authoritarian, Christian nationalist plan that would steer the U.S. towards autocracy..."*¹ 'Project 2025' was created by the Heritage Foundation, a far-right U.S. think-tank.² It is widely considered to have provided the blueprint for the policies of the second Donald Trump administration.
7. It is striking that an English-registered educational charity, required to act in a politically impartial way, would adopt a programme modelled on 'Project 2025'.
8. As to the contents of 'Project 2029' we invite the Commission to review the page for itself. It sets out, in effect, the Charity's current plans for the coming 5 years.
9. The Charity states that its aim is *"to develop the detailed roadmap for how a radical reforming Government"*, including *"a concrete plan for:*
 - *Which laws must be repealed or reformed?*
 - *Which treaties or international bodies must the UK withdraw from?*
 - *What new laws must be enacted?*
 - *Which practices of Government should be repudiated or reformed?*
 - *Which quangos need to be abolished?*
 - *What are the key roles in Government and the public sector in which allies must be placed?*
 - *What are the characteristics of the individuals required for these roles?"*
10. The overall objective is the preparation of a set of legislation to be enacted by a new, right-wing government *"[w]ithin the first 100 days"* of the next election.
11. Although the plan is labelled as *"cross-party"*, that labelling is bogus. The plan is obviously right-wing in nature, rather than genuinely *"non-partisan"* as required by the Charity's constitution. For example, it includes 'research' on the following questions:

¹ http://en.wikipedia.org/wiki/Project_2025

² https://en.wikipedia.org/wiki/The_Heritage_Foundation

"[...] Human Rights Law, Judicial Review, and International Law. Equality law, European human rights law and international law now distort almost every aspect of public policy, limiting Parliament's freedom to make law and Ministers' power to act. How should the UK go about freeing itself from the European Convention on Human Rights? [...]"

"[...] Immigration and Small Boats. Why are we addicted to mass low-skilled immigration – and how do we change this? How can the Small Boats Emergency be halted? To what extent is mass immigration contributing to the acute problem of declining community cohesion? How can we ensure the welfare state consistently prioritises British citizens over immigrants and asylum seekers? What are the full economic costs of immigration on housing, on public services and on the welfare state?"

"[...] Crime and Disorder. [...] How do we roll back "two-tier" justice, tackle extremism and restore the primacy of maintaining public order? [...]"

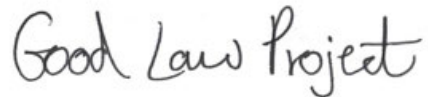
"[...] Planning and Energy. What is the impact of high energy prices – and how much is the current, rapid, trajectory towards Net Zero costing Britain? How could a more pragmatic, market-based energy policy be implemented? How much do repeated legal challenges cost the UK economy – both directly and in terms of deferred investment? [...]"

12. If this plan is pursued, it is impossible to see how it advances the Charity's stated educational goals. It is transparently meant to push for a legislative agenda to be adopted by the next Government. It therefore does nothing to advance the Charity's legal objects of public education. It will involve the large-scale misapplication of the Charity's resources.
13. We invite the Commission to treat 'Project 2029' as evidence that the Charity has no intention of changing its existing approach. It intends to continue nakedly breaching charity law and regulation – and abusing its charitable status to operate as a political actor.
14. We refer you again to the authorities cited at paragraph 10 of our original complaint letter. It is clear that 'Project 2029' would be deprecated by any judge as wholly inappropriate for an English registered charity. It is *"political propaganda masquerading... as education"*, to adopt the phrase used in *Re Hopkinson* [1949] 1 All ER 346. It amounts to intentional mismanagement of the Charity in circumstances where the Trustees have seen our complaint letter, and have full notice of the

relevant legal framework. Given that this has been done when regulatory compliance action is ongoing, we consider it of the utmost seriousness.

15. Finally, we have heard nothing from you on the outcome or progress of the regulatory compliance case. We would be grateful for an update within 28 days, failing which we reserve all our rights including the right to raise a formal complaint.

Yours faithfully

A handwritten signature in black ink that reads "Good Law Project". The script is cursive and fluid, with the words connected together.

Good Law Project