

CMS FILES

A Sourced, Evidence-Based Intelligence Investigation into the Child Maintenance Service, the Institutional Web of Cover-Up, Fraud, Harm and Regulatory Capture That Has Destroyed Families and Cost Lives

FORMAL DEMAND FOR INVESTIGATION — PUBLIC INTEREST DISCLOSURE — MULTI-ADDRESSEE — OPEN DOCUMENT

SUBJECTS OF INVESTIGATION

BARONESS SHERLOCK OBE — Minister of State, DWP
GINGERBREAD (Charity No. 230750) — State-Funded Lobby Organisation

Regulatory Capture · Ministerial Code Breaches · Misfeasance in Public Office · Sock Puppet Lobbying · Unlawful Calculations · ECHR Violations · Parliamentary Capture · Criminal Enforcement · Excess Deaths · Suppression of Complaints · Charity Law Violations · Harm to Second Families · OBE Revocation

FIELD	DETAIL
Date	May 2026
Author & Researcher	Christina Little — Researcher and Author, CMS Files Intelligence Series
Publication	CMS Files — Sourced Intelligence into the Child Maintenance Service and the Institutional Web of Cover-Up, Fraud, Harm and Regulatory Capture
Classification	Open Document — Free to Distribute — No Restriction on Publication
Subject 1	Baroness Maeve Sherlock OBE, Minister of State, DWP — Child Maintenance portfolio
Subject 2	Gingerbread, The Charity for Single Parent Families — Charity No. 230750
Distribution	Charity Commission · Independent Adviser on Ministerial Standards · House of Lords Commissioner · Work and Pensions Select Committee · Parliamentary Commissioner · Attorney General · Honours Forfeiture Committee · SFO · NCA · ICO · NAO · HM Chief Coroner · Media

PART 1: EXECUTIVE SUMMARY — THE CASE IN FULL

This document constitutes a formal demand for investigation into both Baroness Maeve Sherlock OBE and the charity Gingerbread (No. 230750), addressed simultaneously to all bodies with regulatory, parliamentary, or criminal jurisdiction. It is independent of any civil proceedings, names no individual litigant, and stands entirely on public interest grounds.

The evidence establishes a 35-year arc of structural regulatory capture in which:

- Baroness Sherlock simultaneously led the primary receiving-parent lobby group (NCOF/Gingerbread predecessor, 1997–2003) and advised the Treasury on the child maintenance legislation she was lobbying for (2000–2003);
- She then governed the CMS predecessor body (CMEC, 2008–2010), was elevated to the Lords, spent 11 years as Opposition Spokesperson advancing Gingerbread's policy positions, and is now the DWP minister responsible for CMS — disclosing none of these connections on appointment;
- Gingerbread, the successor to the organisation she led, simultaneously receives £383,595 in DWP contracts and grants, serves as the official secretariat of the parliamentary group

scrutinising DWP's CMS policy, and lobbied Sherlock personally in November 2025 — receiving a formal ministerial response;

- The CMS enforcement system they jointly promoted operates on calculations qualified as materially erroneous by the Comptroller and Auditor General every year since 2013, generates £109 million per year in fees with no published evidence base, uses enforcement documents confirmed by courts to have no legal foundation, and is statistically linked to thousands of excess deaths among paying parents — DWP's own FOI-disclosed figures show 9,258 paying parent deaths in five years (2020–2024), from which STOPSuicides UK calculates approximately 4,600 excess deaths using a conservative 2x mortality multiplier applied to the department's own data (FOI2025/78063, February 2026);
- Neither Sherlock nor Gingerbread has called for independent investigation of those deaths. DWP actively discourages FOI requests for suicide data. The minister has made ministerial statements to parliamentary committees that are directly contradicted by her own department's published data;
- The children of paying parents, second families, and blended households — who are directly harmed by this enforcement regime — have never been studied, counted, or represented by either subject. The only research published is by organisations with a direct financial interest in one outcome.

CORE FINDING: The minister responsible for CMS helped design the system, ran the lobby group that profits from it, governed its predecessor body, and now defends it while the charity she used to lead is paid by her department to lobby her. The paying parent, the second family, and children in blended households had no representative at any stage. People are dying. The public demands transparency, answers, and justice.

PART 2: THE CLOSED LOOP — 35 YEARS OF REGULATORY CAPTURE

2.1 Full Career Timeline — Baroness Sherlock

PERIOD	ROLE AND CONFLICT
1997–2003	Chief Executive, NCOF (now Gingerbread). Primary receiving-parent lobby group. Campaigns for enforcement. Receives government funding.
1998–1999	NCOF submitted formal consultation response to 'Children First' (Cm 3992) — shaping the 2000 Act — while Sherlock was CEO.
2000	OBE awarded for services as NCOF CEO. The state honoured her for running the lobby group whose ideology was simultaneously being baked into legislation.
2000–2003 CONCURRENT	Member, HM Treasury Council of Economic Advisers — advising Gordon Brown on 'social issues' WHILE still CEO of NCOF. The Child Support, Pensions and Social Security Act 2000 was designed, passed and commenced in force on 3 March 2003 — entirely within this window.
2008–2010	Senior Independent Director, CMEC (direct statutory predecessor of CMS). Governed the body that designed the enforcement framework still in operation today.
2010–2024	Life peer. Opposition Spokesperson W&P. Declared NCOF/CMEC interests at least five times in CMS debates while citing Gingerbread briefings in the same speeches.

PERIOD	ROLE AND CONFLICT
July 2024–present	Minister of State, DWP. Child Maintenance portfolio. Published ministerial interests: zero disclosure of NCOF, CMEC, or Treasury advisory roles.

DWP confirmed to the Lords Public Services Committee (2025) that the CMS calculation model is based on the Australian system as it existed 'up to the late 2000s' — a model Australia subsequently abandoned as defective. Sherlock advised on the policy architecture of that model from inside the Treasury while simultaneously representing, through NCOF, the lobby group that advocated for it.

Source: DWP supplementary evidence, Lords Public Services Committee 2025 — committees.parliament.uk/writtenevidence/142449/html/

DEMAND 1 — Cabinet Office: Disclose all records of Baroness Sherlock's appointment to the Council of Economic Advisers including any conflict declarations and management of the concurrent NCOF CEO role. National Archives T 720/69 (HM Treasury welfare reform 2001 — open document at Kew) must be produced.

DEMAND 2 — DWP: Publish all minutes, correspondence, and submissions involving NCOF to Treasury or DWP between 1997 and 2003, including the 'Children First' consultation response, and all records in the four categories detailed in Part 5.

PART 3: MINISTERIAL CODE BREACHES — THE DECLARATION FAILURE

3.1 The Rules and the Breach

Ministerial Code para 1.6(f): "Ministers must ensure that no conflict arises, or could reasonably be perceived to arise, between their public duties and their private interests."

Ministerial Code para 3.14: "Once in office, ministers should not therefore normally accept invitations to act as patrons of, or otherwise offer support to, pressure groups or organisations dependent in whole, or in part, on government funding."

Her List of Ministers' Interests (May 2025) declares: Bible Society; Christian Enquiry Agency; Church of England; Westminster Abbey. Nothing else. Not the NCOF CEO role. Not CMEC. Not the Treasury advisory role.

3.2 She Declared It Herself — Five Times in Parliament

"I declare an historic interest as a former non-executive director of the Child Maintenance and Enforcement Commission until 2010, and a very historic interest as a former chief executive of the National Council for One Parent Families, which is now merged with Gingerbread. I thank all those organisations which sent in briefing, including Gingerbread."

— Hansard, House of Lords, 4 February 2014

"I should probably remind the House of a very distant time when I served as the senior independent director of the Child Maintenance and Enforcement Commission, and my time as the director of the National Council for One Parent Families, now joined with Gingerbread."

— Hansard, House of Lords, 19 May 2023

Five public declarations — October 2012, February 2014, December 2015, June 2021, May 2023 — each time acknowledging receipt of Gingerbread briefings. Appointed minister July 2024. Published ministerial interests: nothing declared. This was not an oversight. It was a decision.

DEMAND 3 — Independent Adviser on Ministerial Standards: Open formal investigation into the non-disclosure of NCOF CEO, CMEC SID, and Treasury advisory roles. Publish the Permanent Secretary's conflict management advice. Confirm whether the Gingerbread lobbying response breaches para 3.14.

DEMAND 4 — Lords Commissioner for Standards: Investigate whether Sherlock's failure to declare her interests in Lords CMS proceedings since July 2024 breaches the Lords Code of Conduct, and whether her oral statement to the Lords Public Services Committee on waiting times constitutes a material misstatement.

DEMAND 4A — Honours Forfeiture Committee / Cabinet Office: Baroness Sherlock was awarded an OBE in the 2000 New Year Honours for services rendered in her role as Chief Executive of the National Council for One Parent Families. That organisation is the predecessor to Gingerbread. The OBE was awarded by the state for leading the lobby group whose ideology was simultaneously being embedded in legislation she was helping to design from inside the Treasury — without disclosure of the concurrent advisory role. The award was therefore made in circumstances of an undisclosed structural conflict of interest. Furthermore, the conduct documented in this report — including non-disclosure of ministerial interests declared five times as a parliamentarian; ministerial statements directly contradicted by departmental data; overseeing an enforcement system linked to thousands of documented excess deaths (4,600 in five years per DWP's own disclosed data, FOI2025/78063) without commissioning independent investigation; and the promotion of a system bearing the hallmarks of misfeasance in public office — is incompatible with the standards expected of an OBE holder in public life. The Honours Forfeiture Committee must review whether the OBE awarded to Baroness Sherlock should be revoked.

PART 4: MISFEASANCE IN PUBLIC OFFICE

4.1 The Legal Test

Three Rivers District Council v Governor of the Bank of England (No 3) [2003] 2 AC 1 establishes the test: a public officer who exercises or fails to exercise the power of their office in bad faith — knowing the act was unlawful and knowing or recklessly indifferent that it would cause harm — commits the tort of misfeasance in public office.

(a) Non-Disclosure of Material Interests While Making Ministerial Decisions

She declared these interests publicly five times as a parliamentarian. The non-disclosure on appointment was not a failure of memory — it was a decision. A minister who withholds known structural conflicts while continuing to make decisions affecting millions of people satisfies at minimum the reckless indifference limb of the Three Rivers test.

(b) Ministerial Statement Directly Contradicted by Own Department's Data

Before the Lords Public Services Committee (2025) she stated fewer than 2% of CMS callers waited over an hour, attributing longer wait reports to memory bias. Her own department's published data for April–December 2024 showed: 25% of calls (130,000+) abandoned before being answered; 82,000 calls with waits over one hour; 535,000 calls abandoned. A material misstatement to a parliamentary committee, in circumstances where the data was available to her department, is conduct consistent with the misfeasance limb of targeted misstatement.

Source: House of Lords Public Services Committee, HL Paper 181, October 2025, paras 155–156

(c) Overseeing Enforcement While Aware of Mortality Data

The mortality data was publicly documented before her appointment. DWP's own FOI-disclosed figures (FOI2025/78063) show 9,258 paying parent deaths between 2020 and 2024. STOPSuicides

UK wrote to Sherlock directly in February 2026 calculating approximately 4,600 excess deaths from those same figures using a conservative 2x mortality rate — arithmetic applied to the department's own data. Independent researcher Brian Hudson's peer-reviewed analysis of earlier FOI data (September 2017 to June 2020) found a 14.28x mortality rate for paying parents in arrears. Disability News Service's independent analysis of 2022–2024 DWP data confirmed paying parents face death rates 2–3 times the national average. Every independent source, every time period, confirms the same pattern. She has not commissioned independent research, has overseen expansion of the enforcement regime, and her department actively discourages FOI requests about the deaths.

DEMAND 5 — Metropolitan Police / CPS: Consider whether the conduct in paras (a) to (c) meets the threshold for misfeasance in public office as restated in *Three Rivers* [2003] 2 AC 1.

DEMAND 6 — Independent Adviser: Confirm whether this conduct has been assessed against the misfeasance standard and whether any referral has been made or considered.

PART 5: DEMAND FOR FULL PUBLIC DISCLOSURE OF ALL RECORDS

Full disclosure is demanded of all records in the following categories. Every decision Baroness Sherlock has been party to in her CEO, Treasury, CMEC, and ministerial roles that touches CMS policy must be disclosed:

Category A — NCOF/Gingerbread CEO Period (1997–2003)

- All minutes of meetings between NCOF and HM Treasury, DSS, or DWP;
- All formal consultation submissions made by NCOF to government, including the 'Children First' response;
- All correspondence between Sherlock (as NCOF CEO) and officials in the Treasury Council of Economic Advisers during 2000–2003;
- The NCOF archive at LSE Women's Library (ref 5OPF, 124 boxes, 1917–2002) — government correspondence files 1997–2003.

Category B — CMEC Senior Independent Director (2008–2010)

- All CMEC board minutes in which Sherlock participated;
- All CMEC papers on enforcement policy, fee structures, liability order procedures, and calculation methodology presented during her tenure;
- Any declarations of interest she made as a CMEC board member.

Category C — Ministerial Period (July 2024–present)

- All meetings and correspondence with Gingerbread since July 2024, including the November 2025 open letter and her formal response;
- All internal DWP advice to Sherlock on conflict management at appointment;
- All ministerial submissions on CMS mortality data, excess deaths, or suicide statistics since July 2024;
- All ministerial submissions on Article 6 ECHR compatibility (withheld under LPP in FOI IR2026/14071);
- All records of decisions she made on: calculation methodology; the 20% surcharge; the 2024 consultation; responses to complaints; responses to mortality data.

Category D — Treasury Advisory Records (2000–2003)

- National Archives T 720/69 — HM Treasury welfare reform ministerial briefing 2001 (open document at Kew);
- Any Council of Economic Advisers minutes discussing child maintenance, lone parent welfare, or the 'Children First' consultation between 2000 and 2003;
- Any declarations of interest filed by Sherlock with the Treasury on appointment to the CEA.

DEMAND 7 — Cabinet Office / DWP / National Archives: All records in Categories A through D must be released under FOIA 2000 and/or the Public Records Act 1958. LPP cannot be used to withhold records of structural conflict of interest or records relating to the lawfulness of the enforcement system itself.

PART 6: ARTICLE 6 ECHR — STRUCTURAL INCOMPATIBILITY AND COVER-UP INDICATORS

6.1 The Structural Breach

ARTICLE 6 REQUIREMENT	CMS REALITY — THE BREACH
Independent tribunal	Secretary of State makes enforcement decisions — the same party who receives the 20% surcharge on every collected payment.
Impartial tribunal	Secretary of State is simultaneously creditor, enforcement authority, and decision-maker on whether assessments are correct.
Established by law — lawful process	CMS summonses issued from Plymouth/Wolverhampton, not from courts. Liability orders bear no court seal, no reference, no identified judicial officer (confirmed by HMCTS officers at multiple courts).
Effective remedy	Complaints directed to the same DWP system. DWP's own legal advice on Article 6 compatibility withheld under LPP (FOI IR2026/14071).

The structural Article 6 incompatibility was designed in — not accidental. The replacement of judicial oversight with Secretary of State authority was the stated policy objective of the 1991 Act, shaped during a period when Sherlock simultaneously led the receiving-parent lobby and advised the Treasury. She is now the minister defending it.

6.2 Cover-Up Indicators — Six Documented Instances of Suppression

1. DWP FOI IR2026/14071 — legal advice on Article 6 ECHR compatibility withheld under LPP.
2. DWP 'strongly denies' causal link between CMS and suicides despite public mortality data.
3. CMS actively discouraging FOI requests for suicide data (documented — Justice4Gavin Briggs campaign).
4. Accounting records for arrears write-offs deleted under GDPR, preventing NAO audit (2020–21 Client Funds Account).
5. Contradictory ministerial written answers eight days apart on whether ss.32M/32N CSA 1991 regime commenced (Andrew Western MP, March 2026).
6. DWP FOI confirms CMS summonses issued from Plymouth/Wolverhampton addresses — not courts — directly contradicting the presentation of these documents as court orders.

DEMAND 8 — DWP: Disclose the legal advice withheld under LPP in FOI IR2026/14071 on Article 6 ECHR compatibility. Parliament cannot scrutinise a system whose legal basis is hidden by the department defending it.

DEMAND 9 — Joint Committee on Human Rights: Consider whether the CMS enforcement structure is compatible with Article 6 ECHR and whether DWP's withholding of its own legal advice is consistent with the government's HRA 1998 obligations.

PART 7: UNLAWFUL CALCULATIONS — NO EVIDENCE BASE, CONTINUOUS AUDIT FAILURE

7.1 NAO Qualified and Adverse Opinions — Every Year Since 2013

YEAR	AUDIT FINDING
2013–14	Qualified opinion — material errors in assessments confirmed
2014–15	Qualified; adverse opinion on arrears balance first issued
2015–16	Adverse opinion — £3.976 billion arrears do not properly represent the true position
2016–17 onwards	Continuous qualification — material errors ongoing
2020–21	Additional qualification — accounting records for arrears write-offs deleted under GDPR
All years	Approximately 75% of the £4 billion arrears balance confirmed uncollectable — yet enforcement continues

Source: NAO, Statutory CMS Schemes 2015-16; DWP Client Funds Account 2020-21

7.2 The Fee Structure — £109 Million Per Year With No Published Evidence Base

FEE	AMOUNT — SOURCE
Paying parent surcharge	20% added to every Collect and Pay payment — retained by DWP
Receiving parent deduction	4% deducted from every payment
Annual fee income 2025	Approximately £109 million — DWP statistics December 2025
Published independent evidence base for 20% level	None — the 2013 consultation produced no cost-benefit analysis
Secretary of State position	Simultaneously: fee recipient, enforcement authority, decision-maker

Source: child-maintenance.com, April 2025: confirmed £109 million annual fee income from DWP statistics

DEMAND 10 — DWP: Publish the independent research basis for the 20% surcharge. If none exists, confirm this in writing. Commission an independent review of whether the Collect and Pay fee structure constitutes a lawful use of the Secretary of State's powers under the Child Support Act 1991.

DEMAND 11 — DWP: Publish all payments made from CMS-specific budget lines to voluntary organisations, charities, and NGOs since 2012, with breakdown by recipient and budget line.

PART 8: EXCESS DEATHS — THE MORTALITY CRISIS

METRIC	DATA — SOURCE
Excess deaths Sept 2017–June 2020	2,653 excess deaths against expected 207 — 14x national mortality rate
Suicide rate vs national average	173 times the normal suicide rate in the paying parent arrears population
% of national suicide total	Approximately 20% of national suicide figures
Total paying parent deaths 2020–2024 (DWP own data)	9,258 deaths in five years (2020–2024) per DWP FOI2025/78063. STOPSuicides UK calculates ~4,600 excess deaths using conservative 2x multiplier on DWP's own figures. STOPSuicides UK wrote to Baroness Sherlock directly with this calculation, February 2026 — stops.org.uk
CMS response to FOI requests on suicide data	Explicitly requesting campaigners stop asking — documented by Justice4Gavin Briggs
DWP official position	'Strongly denies any suggestion of a causal link' — response to Craig Bulman petition
Ministerial action since July 2024	No independent mortality research commissioned. Enforcement regime expanded. No welfare impact assessment for paying parents published.

Source: STOPSuicides UK (stops.org.uk) — letter to Baroness Sherlock, 27 February 2026, based on DWP FOI2025/78063; Brian Hudson / stopcmsdrivingsuicide.org — peer-reviewed analysis, FOI data September 2017–June 2020; Disability News Service, 30 October 2025; justice4gavinbriggs.com

DEMAND 12 — Independent Inquiry: An independent public inquiry under the Inquiries Act 2005 must be established into the excess mortality of CMS paying parents, including: (a) the statistical data from FOI; (b) DWP's refusal to commission research; (c) active discouragement of FOI requests; (d) what Sherlock knew on appointment and what she did with that knowledge.

DEMAND 13 — ICO: Investigate DWP's handling of FOI requests for CMS suicide and mortality data, including active discouragement of further requests, under FOIA 2000.

DEMAND 14 — HM Chief Coroner: Implement a protocol requiring CMS involvement to be investigated as a contributory factor in all inquests involving paying parents with active enforcement proceedings.

PART 9: COMPLAINTS SHUTDOWN — FACTUALLY INCORRECT MINISTERIAL RESPONSES

(a) Lords Committee Misstatement on Waiting Times

Before the Lords Public Services Committee (2025) Sherlock stated fewer than 2% of callers waited over an hour, attributing longer reports to memory bias. DWP's own data for April–December 2024: 25% of calls (130,000+) abandoned before being answered; 82,000 calls waiting over one hour; 535,000 calls abandoned. Her oral statement was directly and materially contradicted by her own department's published figures.

Source: HL Paper 181, October 2025, paras 155–156

(b) Written Answer on CMS Complaint Standards — January 2025

In response to a parliamentary question on CMS complaint service standards, the ministerial answer confirmed the 15 working day standard but did not disclose actual compliance rates — which DWP data shows are substantially below target — nor acknowledge that the CMS complaint process is itself the subject of documented systemic failure.

Source: parliament.uk/written-questions, 27 January 2025

(c) 2024 Consultation — No Paying Parent Welfare Assessment

The 2024 CMS consultation oversaw by Sherlock focused exclusively on enforcement consolidation using framing drawn directly from Gingerbread's policy platform. It contained no reference to paying parent mortality data, no welfare impact assessment for paying parents or second families, and no independent economic analysis of the 20% surcharge level.

Source: GOV.UK: 'Child Maintenance consultation extended', Baroness Sherlock, July 2024; Gingerbread 'Fix the CMS' report November 2024

DEMAND 15 — Work and Pensions Select Committee: Call Baroness Sherlock to give oral evidence under oath on: (a) the discrepancy between her committee statement on waiting times and DWP's own data; (b) mortality data she received on appointment; (c) independent research she has commissioned or refused to commission; (d) why the 2024 consultation contained no paying parent welfare assessment.

DEMAND 16 — Lords Commissioner: Assess whether Sherlock's oral statement to the Lords Public Services Committee constitutes a material misstatement under the Lords Code of Conduct.

PART 10: CRIMINAL ENFORCEMENT — DOCUMENTS WITHOUT LEGAL BASIS

CMS enforcement documents (CMEL7298/CMEL7211) bear no court seal, no court reference, no identified judicial officer, and are issued from CMS addresses in Plymouth and Wolverhampton — not from any court. HMCTS officers at multiple courts have confirmed in writing that no signed liability order exists on any court file. The controlling authority is *R v Manchester Stipendiary Magistrate ex parte Hill* [1983] 1 AC 328: the summons must be issued by the court. It is not. The summons is void. The liability order has no legal foundation. Their registration at HM Land Registry as charges against paying parents' property may constitute offences under the Forgery and Counterfeiting Act 1981 ss.1, 3, 9(1)(g) and/or the Fraud Act 2006 ss.2–3.

DEMAND 17 — Police / CPS: Formally investigate whether CMS enforcement documents constitute false instruments under the Forgery and Counterfeiting Act 1981, and whether their Land Registry registration constitutes fraud under the Fraud Act 2006.

DEMAND 18 — SFO: Consider whether the CMS enforcement document series and associated Land Registry registrations fall within SFO jurisdiction under s.1 Criminal Justice Act 1987, including whether the £109 million per year in fees generated through the enforcement process may constitute proceeds of an unlawful activity.

PART II — GINGERBREAD: INVESTIGATION AND DEREGISTRATION DEMAND

CHARITY NO. 230750 — SOCK PUPPET LOBBYING — STATE CAPTURE — HARM TO CHILDREN

Addressed to: The Charity Commission for England and Wales

cc: Attorney General · Parliamentary Commissioner · DWP Permanent Secretary · Work and Pensions Select Committee · SFO · NAO

PART 11: GINGERBREAD — EXECUTIVE SUMMARY OF THE CASE

This section constitutes a formal demand to the Charity Commission under section 46 of the Charities Act 2011 to open a statutory inquiry into Gingerbread (No. 230750). Gingerbread is not operating as an independent charitable organisation for the public benefit. The evidence establishes that it is operating as an instrument of government policy — a sock puppet — that:

- Is funded by DWP (£383,595) and simultaneously lobbies DWP ministers — specifically the minister who was formerly its predecessor organisation's CEO;
- Serves as official APPG secretariat — writing briefings for MPs scrutinising the very DWP policy it is paid to promote;
- Has never published research on, or advocated for, the children in paying-parent households, second families, or blended households who are directly harmed by the enforcement regime it promotes;
- Intervened in court proceedings as a party to litigation against paying parents — funded in part by DWP;
- Has made no call for independent investigation of excess deaths in the CMS paying parent population — 9,258 total paying parent deaths in five years per DWP's own FOI data (FOI2025/78063), with STOPSuicides UK calculating approximately 4,600 excess deaths from those same figures. These deaths represent bereaved children, not only adults deceased;
- Operates with a structural independence failure arising from the DWP minister's prior CEO role at its predecessor — a conflict its own governance procedures required to be identified and reported as a serious incident.

CORE FINDING: Gingerbread is a state-funded lobbying instrument serving government policy, not an independent charity serving the public benefit. Its advocacy contributes to documented harm. Its governance has failed to manage or report structural conflicts. The Charity Commission must open a statutory inquiry immediately.

PART 12: SOCK PUPPET LOBBYING — THE CLOSED LOOP

12.1 The Definition and the Applicable Legal Framework

"The practice of sock puppetry occurs when government gives money to pressure groups that then lobby government for more money and regulation, creating a closed loop of government talking to itself."

— IEA, 'Sock Puppets: How the Government Lobbies Itself and Why', Christopher Snowden, 2012

The Cabinet Office recognised and addressed this problem in 2016:

"A new clause to be inserted into all new and renewed grant agreements will make sure that taxpayer funds are spent on improving people's lives and good causes, rather than lobbying for new regulation or using taxpayers' money to lobby for more government funding. It ensures that payments do not support activity that could influence or attempt to influence Parliament, government or political parties."

— Cabinet Office press release, 2016 — gov.uk

The central question this investigation demands to be answered: Do DWP's grant agreements with Gingerbread contain the Cabinet Office anti-lobbying clause? If yes, has it been complied with? If no, why not?

12.2 The Gingerbread Closed Loop — Documented

STEP	DOCUMENTED FACT
1. DWP funds Gingerbread	£383,595 in contracts and grants — Charity Commission 2024
2. Gingerbread lobbies DWP minister	November 2025 open letter hand-delivered to Caxton House — formally responded to by Sherlock
3. Gingerbread writes MP briefings	Joint APPG secretariat — writes briefings, sets agendas, advises Chair and Officers
4. MPs question DWP using Gingerbread arguments	MPs in CMS debates acknowledged receiving Gingerbread briefings on record (Hansard)
5. DWP responds favourably	Sherlock's consultation framing mirrors Gingerbread's 'Fix the CMS' platform (November 2024)
6. DWP continues to fund Gingerbread	Contracts and grants renewed — current to 2024 accounts

DEMAND 19 — DWP: Immediately suspend all contracts and grants to Gingerbread pending Charity Commission inquiry. Publish the full terms of all DWP grant agreements with Gingerbread since 2012, including whether the Cabinet Office anti-lobbying clause was included in each.

DEMAND 20 — Charity Commission: Open a statutory inquiry under s.46 Charities Act 2011 into Gingerbread. Specifically: (a) whether the Cabinet Office anti-lobbying clause was included in DWP grant agreements and complied with; (b) whether the structural conflict arising from the DWP minister's prior CEO role was identified and reported as a serious incident as required; (c) whether Gingerbread's actual activities meet the public benefit requirement under ss.2–4 Charities Act 2011.

PART 13: THE PUBLIC BENEFIT FAILURE — SECOND FAMILIES, BLENDED HOUSEHOLDS, AND ALL CHILDREN

13.1 The Ignored Population

Gingerbread's stated charitable objects are to benefit children of single-parent families. Paying parents who are themselves single parents, and children in paying-parent households, second families, and blended households, are within or adjacent to that beneficiary class. Gingerbread has never:

- Published research on the impact of CMS enforcement on children in paying-parent households;
- Published research on children in second families and blended households affected by enforcement-driven financial pressure on their parent;
- Called for independent investigation of excess deaths in the CMS paying parent population — DWP's own disclosed data shows 9,258 paying parent deaths in five years, with STOPSuicides UK calculating approximately 4,600 excess deaths. These deaths represent children bereaved, not only adults deceased;
- Advocated for the calculation model to adequately account for children in the paying parent's current household;
- Acknowledged that the model it promotes is based on an abandoned Australian system.

13.2 The Missing Impact Assessment

DWP's own June 2025 impact assessment for the CMS consolidation states the policy will lift '20,000 more children out of poverty.' This calculation considers only children in receiving-parent households. It contains **zero assessment** of children in paying-parent households, second families, or blended households. The same enforcement mechanism that keeps 160,000 children out of poverty in receiving-parent households simultaneously reduces income in paying-parent and second-family households — affecting children whose welfare has never been counted.

Source: DWP, 'Introduction of single maintenance collection and transfer service — impact on child poverty levels', June 2025 — gov.uk (confirmed: no second family or paying parent household assessment)

Independent academic research establishes the foundation for what has never been measured:

"Educational outcomes for children in blended families — stepchildren and their half-siblings who are the joint children of both parents — are similar to each other and substantially worse than outcomes for children reared in traditional nuclear families."
— Family Structure and Children's Educational Outcomes — Cambridge University Press

"Child maintenance policies can work as effective cost recovery tools for the state but have no poverty reduction impact."
— Journal of Social Policy, Cambridge University Press, 2020 — doi:10.1017/S0047279419000151

THE DEMAND FOR AN INDEPENDENT STUDY

A genuinely independent study must be commissioned — with no involvement from DWP-funded advocacy organisations — that measures the full welfare impact of CMS enforcement on all affected children: receiving-parent households; paying-parent households; second and blended family households; and children bereaved by parent suicide linked to CMS enforcement. This study must be the basis for any future reform of the calculation or enforcement model. No further reform should proceed without it.

DEMAND 21 — NAO / Work and Pensions Select Committee: Commission an independent study of the welfare impact of CMS enforcement across all affected children. The study must be conducted by researchers with no financial relationship with DWP and no prior advocacy on either side. Gingerbread must not be involved.

DEMAND 22 — Work and Pensions Select Committee: Refuse to accept evidence from Gingerbread as independent evidence until the Charity Commission inquiry findings are published. Call Gingerbread's Chair (Sarah Pinch) and CEO (Abigail Wood) to give oral evidence on the anti-lobbying clause, the ministerial conflict, and what Gingerbread has done with its knowledge of the mortality data.

PART 14: CHARITY LAW — GROUNDS FOR INQUIRY AND DEREGISTRATION

PROVISION	APPLICATION TO GINGERBREAD
s.4 Charities Act 2011 — Public Benefit	Every purpose must be for the public benefit. Advocacy for CMS enforcement is linked to thousands of excess deaths in the paying parent population — DWP's own FOI2025/78063 discloses 9,258 paying parent deaths between 2020 and 2024, from which STOPSuicides UK calculates approximately 4,600 excess deaths. No independent net benefit assessment has been published.
s.14 — Duty to Have Regard to Guidance	CC9 requires political campaigning to further charitable purposes, not funder interests. Gingerbread's advocacy serves DWP's institutional interests and revenue.

PROVISION	APPLICATION TO GINGERBREAD
s.46 — Statutory Inquiry Power	The Commission may open an inquiry where there is evidence of misconduct or mismanagement; risk to charity property; or need to safeguard public trust. All three grounds are engaged.
s.76 — Power to Remove Trustees	Where mismanagement is found, the Commission may remove or suspend trustees. The failure to identify and report the structural ministerial conflict is a governance failure within this power.
Charities (Protection and Social Investment) Act 2016	Extended powers to disqualify trustees and act against charities operating contrary to stated purposes.
Cabinet Office anti-lobbying clause (2016)	Designed precisely to prevent DWP-funded charities using grant money to lobby DWP. Whether this clause was included in Gingerbread's grant agreements is the key question for DWP and the Charity Commission.

14.1 The Fraud Act Question

If Gingerbread's charitable status was obtained or maintained on the basis that it operates independently for the public benefit, when in fact it operates as a government-funded lobbying instrument, a question arises as to whether charitable status has been maintained by false representation within the meaning of the Fraud Act 2006 s.2. This is a question for the **Attorney General**, who has statutory functions in relation to charities operating contrary to their stated purposes, and for the Charity Commission in its statutory inquiry.

DEMAND 23 — Charity Commission: Open statutory inquiry under s.46 Charities Act 2011 immediately. Suspend Gingerbread's registration pending inquiry findings. Require trustees to account for the governance failure on the ministerial conflict. Consider whether Gingerbread's actual activities are consistent with its registered charitable purposes under ss.2–4 Charities Act 2011. If the inquiry finds that Gingerbread has operated as a government-funded lobbying instrument rather than an independent charity for the public benefit, exercise the power to deregister the charity. The Charity Commission exists to protect public trust. A DWP-funded organisation that lobbies DWP, briefs the MPs who scrutinise DWP, and has never advocated for the children harmed by the policy it is paid to promote does not deserve charitable status.

DEMAND 24 — Attorney General: Consider whether Gingerbread's maintenance of charitable status while operating as a government-funded lobbying instrument constitutes a matter for the Attorney General's functions in relation to charities operating contrary to their stated purposes.

DEMAND 25 — SFO: Consider whether Gingerbread's government funding — received for activities promoting and defending a potentially unlawful enforcement regime — falls within SFO jurisdiction under s.1 Criminal Justice Act 1987.

PART 15: CONSOLIDATED FORMAL DEMANDS — ALL 25

All recipients must confirm receipt and provide a substantive written response within 28 days. Failure to respond will be treated as a matter of public record.

To the Independent Adviser on Ministerial Standards

7. Formal investigation into non-disclosure of NCOF CEO, CMEC SID, and Treasury advisory roles. (Part 3)
8. Publish the Permanent Secretary's conflict management advice on appointment. (Part 3)
9. Confirm whether the Gingerbread lobbying response breaches Ministerial Code para 3.14. (Part 3)

To the Honours Forfeiture Committee / Cabinet Office

10. Review whether the OBE awarded to Baroness Sherlock in the 2000 New Year Honours should be revoked in light of: (a) the undisclosed concurrent conflict of interest under which it was awarded; and (b) the conduct documented in this report, which is incompatible with the standards expected of an OBE holder in public life. (Part 3 / Demand 4A)

To the House of Lords Commissioner for Standards

11. Investigate failure to declare interests in Lords proceedings since July 2024. (Part 3)
12. Assess whether the Lords Committee statement on waiting times is a material misstatement. (Part 9)

To the Charity Commission for England and Wales

13. Open statutory inquiry under s.46 Charities Act 2011 into Gingerbread No. 230750. (Part 14)
14. Require trustees to account for the governance failure on the ministerial conflict. (Part 14)
15. Consider s.76 powers pending inquiry findings. (Part 14)

To the Work and Pensions Select Committee

16. Call Baroness Sherlock to give oral evidence on interests, mortality data, and the 2024 consultation. (Part 9)
17. Commission independent study of welfare impact on all affected children. (Part 13)
18. Refuse Gingerbread evidence until Charity Commission inquiry is complete. (Part 13)
19. Call Gingerbread Chair and CEO to give evidence on anti-lobbying clause and ministerial conflict. (Part 13)

To the Cabinet Office

20. Disclose all records of Sherlock's Council of Economic Advisers appointment including conflict declarations. (Part 2)
21. Confirm whether her appointment as CMS minister was reviewed for apparent bias. (Part 4)

To DWP

22. Suspend all Gingerbread contracts and grants immediately. (Part 12)
23. Publish all DWP grant agreement terms with Gingerbread including anti-lobbying clause status. (Part 12)
24. Publish independent research basis for the 20% surcharge. (Part 7)
25. Publish all CMS budget line payments to voluntary organisations since 2012. (Part 7)
26. Disclose legal advice in FOI IR2026/14071 on Article 6 ECHR. (Part 6)
27. Commission and publish independent paying parent mortality research. (Part 8)
28. Disclose all records in Categories A through D. (Part 5)

To the Information Commissioner

29. Investigate DWP's handling of CMS suicide/mortality FOI requests including active discouragement. (Part 8)

To the Joint Committee on Human Rights

30. Consider Article 6 ECHR compatibility of the CMS enforcement structure and the withheld legal advice. (Part 6)

To the Attorney General

31. Consider whether Gingerbread's charitable status is being maintained by false representation. (Part 14)

To the Serious Fraud Office

32. Consider whether CMS enforcement documents and Land Registry registrations engage SFO jurisdiction. (Part 10)
33. Consider whether Gingerbread's DWP funding constitutes proceeds of an unlawful activity. (Part 14)

To the Police and CPS

34. Formally investigate CMS enforcement documents against the Forgery and Counterfeiting Act 1981 and Fraud Act 2006. (Part 10)

To HM Chief Coroner

35. Implement CMS-related inquest protocol and review all prior inquests of paying parents in CMS arrears since 2013. (Part 8)

PART 16: EVIDENTIAL SOURCE TABLE — ALL CLAIMS INDEPENDENTLY VERIFIABLE

CLAIM	SOURCE — URL/REFERENCE
Sherlock CEO NCOF 1997-2003; OBE 2000	Wikipedia / Wikiwand; London Gazette No. 55710
Sherlock Treasury CEA 2000-2003	Wikipedia: 'member of the Council of Economic Advisers from 2000 to 2003'
Sherlock CMEC SID 2008-2010	Wikipedia; confirmed 'Senior Independent Director' Hansard 2023
Sherlock EHRC Commissioner 2007-2010	Wikipedia / Wikiwand
Hansard declarations x5 (2012–2023)	Lords debates: 15 Oct 2012; 4 Feb 2014; 9 Dec 2015; 24 Jun 2021; 19 May 2023
Ministerial interests omissions May 2025	assets.publishing.service.gov.uk/media/68381f6ff5df370a4eaa2cf5
Gingerbread £228K contract + £155K grant	Charity Commission No. 230750 — register-of-charities.charitycommission.gov.uk

CLAIM	SOURCE — URL/REFERENCE
Gingerbread DWP contract 2015 £57K	Contracts Finder — DWP contract notice
Gingerbread lobbying / Sherlock response Nov 2025	Gingerbread.org.uk — 'Gingerbread hands in CMS open letter'; 'Government responds'
APPG CMS secretariat	OPFS — opfs.org.uk/policy-and-campaigns/.../appg-on-child-maintenance-service/
APPG funding loophole	Byline Times, 28 July 2025 — bylinetimes.com
Cabinet Office anti-lobbying clause 2016	gov.uk/government/news/government-announces-new-clause-to-be-inserted-into-grant-agreements
IEA Sock Puppets report	Christopher Snowden, IEA, 2012
CMS fee income £109m 2025	child-maintenance.com — DWP statistics December 2025
20% surcharge / 4% fee	nidirect.gov.uk ; commonslibrary.parliament.uk
No pilot testing, 1991 Act	Centre for Public Impact — centreforpublicimpact.org
Australia model adopted and abandoned	DWP supplementary evidence, Lords PSC 2025 — committees.parliament.uk/writtenevidence/142449
Secretary of State replaces courts	History & Policy — historyandpolicy.org
NAO adverse opinion 2015-16	nao.org.uk — CMS Statutory Schemes 2015-16
NAO records deleted 2020-21	DWP Client Funds Account 2020-21 — gov.uk
NAO 75% arrears uncollectable	NAO 2017, cited Barker Gotelee
~1,000 excess deaths per year	Wikipedia Child Maintenance Group; DWP FOI2025/78063 (9,258 deaths 2020–2024); STOPSuicides UK letter to Baroness Sherlock, 27 February 2026 (stops.org.uk/4600-excess-deaths-in-cms-paying-parents/)
14x mortality rate	Brian Hudson / stopcmsdrivingsuicide.org — peer-reviewed FOI analysis 2017–2020; revised figure ~500 excess deaths/year; 14.28x mortality rate (academically published)
3x death rate — DNS analysis	Disability News Service, 30 October 2025 — disabilitynewsservice.com
CMS discouraging suicide FOIs	justice4gavinbriggs.com
DWP 'strongly denies' causal link	DWP response to Craig Bulman petition
Sherlock Lords Committee statement vs DWP data	HL Paper 181, October 2025, paras 155–156
FOI IR2026/14071 — Article 6 LPP	DWP FOI response
Misfeasance legal test	Three Rivers District Council v Governor of the Bank of England (No 3) [2003] 2 AC 1
Ministerial Code	GOV.UK — updated 13 October 2025
National Archives T 720/69	HM Treasury welfare reform 2001 — open document, Kew
DWP impact assessment no second family data	DWP June 2025 — gov.uk
Blended family educational outcomes	Cambridge University Press — ResearchGate
Child maintenance as state cost recovery	Journal of Social Policy 2020 — doi:10.1017/S0047279419000151
Gingerbread governance policies	Charity Commission No. 230750 — governance record

CLAIM	SOURCE — URL/REFERENCE
Charities Act 2011	legislation.gov.uk/ukpga/2011/25
s.46 statutory inquiry guidance CC46	gov.uk/government/publications/statutory-inquiries-into-charities-guidance-for-charities-cc46
Charities (Protection and Social Investment) Act 2016	legislation.gov.uk/ukpga/2016/4

CERTIFICATION AND NOTICE TO ALL RECIPIENTS

This document is produced as an independent public interest disclosure and forms part of the CMS Files intelligence series — a sourced, evidence-based investigation into the Child Maintenance Service and the institutional web of cover-up, fraud, harm and regulatory capture that has destroyed families and cost lives.

Researched and authored by Christina Little. All statements of fact are sourced to publicly verifiable documents identified in Part 16. The legal analyses represent the analytical conclusions of the author based on cited evidence and are not a substitute for legal advice.

This disclosure is being made simultaneously to multiple regulatory, parliamentary and investigative bodies. All recipients are notified that their responses — or failure to respond — will be treated as matters of public interest and reported accordingly.

This document contains no reference to any pending civil proceedings, any individual litigant, or any criminal complaint made by any identified individual. It stands entirely on grounds of independent public interest investigation.

THE PUBLIC DEMANDS: TRANSPARENCY · ANSWERS · JUSTICE

Baroness Sherlock must stand aside pending full independent investigation.

Her OBE — awarded for running the lobby group that built this system — must be referred to the Honours Forfeiture Committee for revocation.

Gingerbread must be deregistered. The Charity Commission must act.

Every family harmed by this regime deserves accountability — not silence.

Researched and authored by Christina Little — CMS Files Intelligence Series

#CMSFiles #ShutDownGingerbread #JusticeForPayingParents #SecondFamiliesMatter #HoldSherlockAccountable
#RevokeTheOBE #FixCMS