

Report of an Investigation into a Complaint brought by  
Mrs. Sheila Smith against Cllrs Harry Rayner and  
Robin Betts of Wrotham Parish Council and Cllr Mike  
Taylor of Borough Green Parish Council

Private & Confidential

**Final Version**

17 October 2016

**Richard Lingard LLB**  
**Solicitor**

7 Downside Road  
Guildford  
Surrey  
GU4 8PH

T: 01483 537614  
M: 07769 691370  
E: [richardglingard@gmail.com](mailto:richardglingard@gmail.com)

ICO Registration No: Z27409852

## **Richard Lingard – Curriculum Vitae**

Educated at Magdalen College School Oxford and Southampton University, I qualified as a solicitor in 1980. I trained in private practice and spent four years in the commercial sector before going into local government.

Until my retirement in September 2011, I was the Head of Legal & Democratic Services and Monitoring Officer at Guildford Borough Council for whom I worked for some 30 years.

Since 2011, I have conducted and reported on some 25 investigations covering allegations of misconduct against City, County, Borough, Town and Parish Councillors and Council Officers and have carried out a number of procedural and governance reviews for local authorities. I also provide training sessions on ethical standards.

## EXECUTIVE SUMMARY

This is my draft report of an investigation that I have carried out into alleged breaches of the Codes of Conduct of Wrotham and Borough Green Parish Councils on the part of three Parish Councillors, Harry Rayner and Robin Betts (both of Wrotham PC) and Mike Taylor (of Borough Green PC)

The matters at issue formed the subject of a complaint submitted to Mr. Adrian Stanfield, the Monitoring Officer of Tonbridge & Malling Borough Council (TMBC) by Mrs Sheila Smith on 18 March 2016 arising from events that took place at Wrotham School on the afternoon of Friday 4 March 2016.

I have concluded that there have been breaches of the respective Codes of Conduct of Wrotham Parish Council and Borough Green Parish Council on the part of Cllrs Harry Rayner and Robin Betts (WPC), and Cllr Mike Taylor (BGPC)

### 1. INTRODUCTION

- 1.1 The complainant in this matter is Mrs Sheila Smith, who is Chair of the Governors of Wrotham School, the Head Teacher of which is Mr Matthew Wright.
- 1.2 The complaint (reproduced as **Appendix 1**) concerns the alleged conduct of the three councillors mentioned above who arrived at Wrotham School during the afternoon of Friday 4 March 2016 (without an appointment) and asked to have a meeting with Mr. Wright about financial matters concerning the application of funds to the purchase of a replacement boiler for the school changing rooms in contravention (as they considered it) of the terms of a Community Use Agreement to which the school and both Parish Councils (amongst others) were party.
- 1.3 Mr. Wright was unable and unwilling to meet the councillors there and then because of previous commitments and the complaint is that he was prevented by the acts and / or omissions of one or more of the councillors from leaving the school premises. He also considers that he was bullied or intimidated by one or more of them.
- 1.4 All three councillors deny that they behaved otherwise than politely towards Mr. Wright and they reject the allegations that they bullied or intimidated him or prevented him from leaving the school premises.
- 1.5 An additional element of the complaint concerns Cllr Rayner only and relates to the contents of an email that he sent on 9 March 2016. Further details appear below.

### 2. BACKGROUND TO THE COMPLAINT AND SCOPE OF THE INVESTIGATION

- 2.1 A number of years ago, TMBC was approached by Wrotham School ('the School') to discuss the possibility of using the field adjacent to the School, Whitegates Field, as a site for an all-weather floodlit football pitch. TMBC, which owns the field, agreed to grant a lease of the field to the School.
- 2.2 The overall cost of the project was split between funding from the Football Foundation (50%) and contributions from TMBC, Kent County Council (KCC), Grange Park School, Borough Green Junior Football Club, Wrotham Parish Council (WPC) and Borough Green Parish Council (BGPC).
- 2.3 On 15 December 2010, the School entered into a Community Use Agreement (CUA) with all the funding partners mentioned above (except the Football Foundation) who were collectively defined in the CUA as the 'Steering Group'. This was, and remains, the only formal

agreement between the School and the Steering Group, subsequent discussions concerning possible revisions to the CUA not having resulted in any formal amendments.

- 2.4 TMBC has been represented on the Steering Group by officers from its Leisure Services Department, most recently in the person of Beverley Emmerson, Sports Development Officer, who chaired the meetings of the group. Other members nominated their own representatives and it was in this capacity that Councillors Rayner, Betts & Taylor attended meetings of the group on behalf of their respective Parish Councils.
- 2.5 It may be noted for information that whilst Cllrs Betts and Taylor are both members of TMBC, Cllr Rayner is not a borough councillor.
- 2.6 It is not necessary for the purposes of this report to detail all the provisions of the CUA but the key clause which is relevant to the matters giving rise to the complaints against the three Councillors is Paragraph 11.4, which provides as follows:

*'Where it is clear that the School Facility is generating an operational surplus from the income it receives in respect of Community Use or other third party use, after all Operating Costs have been paid, such surplus will be used to create the sinking fund to: (a) maintain, repair and renew fixed life elements of the School Facility, and the School Amenities and then (if possible) to (b) increase the use of the School Facility and / or (c) improve and increase the School Facility and the School Amenities and subject to Clause 11.1 above the pricing policy may affect this'.*

*'Operating Costs' are defined in the CUA as being 'staff costs and administration, lighting, cleaning and routine maintenance, insurance premiums, non-capital equipment, repair and replacement and any other costs attributable to the use of the School Facilities and the School Amenities including any costs or loss caused by the negligence or willful damage of any of the Community Groups or otherwise arising from Community Use'.*

The 'School Facility' is the 3G Pitch (so called and to which further reference is made below), whilst the 'School Amenities' are *'changing and car parking facilities next to or close to the WSCA forming part of the School premises.'*

It is understood that the 'WSCA' is one and the same thing as the 3G Pitch.

- 2.7 The issue that gave rise to the incident on 4 March 2016 was whether the School had breached the terms of the CUA by applying funds from the community use of the facility to the purchase of a new boiler for the changing facility.
- 2.8 The clear view of TMBC is that the purchase of the new boiler did not contravene the provisions of the CUA and that there was in any event no obligation upon the School to secure the agreement of the Steering Group to the expenditure involved.
- 2.9 Although, as appears below in the record of my interviews with them, Councillors Rayner, Betts and Taylor are convinced that it should be otherwise, my brief, the scope of the investigation and, therefore this report, do not extend to an examination of this issue.
- 2.10 Specifically, my investigation and report are confined to the manner in which the three councillors conducted themselves on 4 March and, in relation to Cllr Rayner only, to the contents of an email that he sent some five days later to a number of parties and in which he is alleged to have impugned the integrity of the School's Governors and Head Teacher.

### **3. PROVISIONS CONSIDERED**

3.1 In common with arrangements at all local authorities, WPC and BGPC members are required to comply with a Code of Conduct. Both councils have adopted the NALC Code of Conduct, the text of which is set out in **Appendix 2** to this report.

3.2 Although the complainant in this case did not specify which paragraph(s) of the Code she considers that the councillors may have breached, nor is she under any obligation to do so, I agree with Mr. Stanfield's view that the following paragraphs are relevant here:

*'Member Obligations*

1. *He / she shall behave in such a way that a reasonable person would regard as respectful*
2. *He / she shall not act in a way which a reasonable person would regard as bullying or intimidatory'*

3.3 TMBC has its own Code of Conduct but as neither Cllr Betts nor Cllr Taylor, both of whom are TMBC members, were acting in that capacity on the day in question, the TMBC Code has no application in this matter.

3.4 In conducting my investigation I have therefore assessed the complaint against those paragraphs of the Code cited at Paragraph 3.2 above.

### **4. PROCESS TO DATE**

4.1 Following an initial contact from Mr. Stanfield on 27 April 2016 and a preliminary exchange of emails, I was appointed to conduct this investigation and provided with hard and electronic copies of a number of documents including the following:

- Complaint Form
- Initial Responses of the Subject Members
- Various Correspondence and copy emails
- The NALC Code of Conduct
- Community Use Agreement
- Email confirming TMBC's view as to the alleged breach of the CUA
- Press articles
- Contact Details

4.2 Following my receipt and perusal of this material I contacted the complainant Mrs Smith (and through her, the Head Teacher Mr. Wright) and all three councillors by email on 1 May with a view to arranging to meet and interview them.

4.3 I made arrangements to meet and interview Mrs Smith, Mr. Wright, the Deputy Head Teacher Michael Cater, Mr. Wright's PA Mrs Rachel Martin and School Receptionist Mrs Sue Reeve all on the same day, Tuesday 10 May, at Wrotham School.

4.4 I was not able to interview the three councillors quite so quickly as they declined to meet me individually, expressing a strong wish to be interviewed together and the first date upon which it proved possible to get together was not until Wednesday 6<sup>th</sup> July.

4.5 It should be noted that the following paragraphs set out the versions of events and opinions of the respective interviewees. Their inclusion here does not carry any endorsement on my part as to their veracity or otherwise.

## **5. MR. MATTHEW WRIGHT**

- 5.1 In accordance with my normal practice and with Mr. Wright's consent I made a digital audio recording of our conversation and used it as the basis of a draft note that I subsequently submitted to him by email for comment. He approved my draft with minor amendments and the following paragraphs are drawn from that note as amended.
- 5.2 Matthew Wright (MW) has been Head Teacher of Wrotham School since January 2012. He described the school, which has approximately 100 staff, as a smaller than average secondary school, catering for some 750 children aged 11 to 18.
- 5.3 Whilst he is obviously aware of the existence of the Community Use Agreement (CUA), it predates Mr. Wright's time at the school. The 3G pitch had been in use for about four months when he took up his post. He confirmed that Mr. David Day, who is the Wrotham School signatory to the agreement, was his predecessor as Head Teacher.
- 5.4 MW first became aware of the nature and content of the CUA when he became involved with the Steering Group, although this was at his own instigation, no one else having referred him to it. He does not believe that the CUA was regularly used by the Steering Group, and does not believe members of the steering group have ever reviewed it. He considers that the CUA very clearly indicates that the use of surplus funds for the purchase of a new boiler for the changing facilities was perfectly legitimate and said that his view on this important point had subsequently been vindicated by confirmation to that effect from the TMBC legal team.
- 5.5 MW attends meetings of the Steering Group, although he has not been to every single one. He is the sole representative of the school at the meetings.
- 5.6 He explained the background to the issue of the boiler in brief, as follows. The changing rooms across the car park from the main school premises are part of the 3G facility and are used by some of the Wrotham School students, including sixth form members of the Football Academy who train there and represent the school in an Academies League. Sometimes other students use the facilities, but hirers from the community also use it, and this is where the income (and hence surplus) originates.
- 5.7 The income from hirings goes into a separate bank account called 'Wrotham 3G' which is linked to and managed by the school. The 3G facilities are managed by a Mr. Phil Garland who is a community volunteer for Borough Green Juniors Football Club. He represents them on the Steering Group and has managed the 3G pitch since about September 2015. His appointment reflected the need to ensure not only that the pitch was maintained to an acceptable standard, but also that bookings were properly organised and paid for. Mr. Garland is self-employed and invoices the school in respect of his work. He has established good relationships with the users and is thus in a good position to generate more income.
- 5.8 It was Mr. Garland who identified the need for a new boiler. He mentioned that a number of users had expressed dissatisfaction that the existing one was not functioning properly and that users could not be guaranteed hot showers or washing facilities. Some users had made representations about refunds and / or cancellation of bookings, so the matter was considered urgent. Three quotes were accordingly secured and an order was placed.
- 5.9 The decision as to the source of funding to meet the cost of the replacement was made by MW and his Finance Director.
- 5.10 MW confirmed that he knew all three councillors against whom the complaint has been made. Cllr Rayner had at one time been a Governor of the School but once it achieved

Academy status, he was, so MW understood, debarred from office by virtue of having on one or more occasions been declared bankrupt.

- 5.11 As to Cllr Taylor, MW really only knew him from the Steering Group, although he had met him on one or two previous occasions in his role as a local Parish Councillor.
- 5.12 MW had only known Cllr Betts for a few months, in his capacity as a member of the Steering Group.
- 5.13 All three have attended meetings of the Steering Group held in MW's office.
- 5.14 The context of the events of 4 March can be summarised thus. On Tuesday 1 March, Mr Garland came into the school for one of his regular weekly finance monitoring meetings with the School's Resource Manager and noted a transfer of some £11,295 from the 3G Account into another School account in respect of the boiler invoice. He subsequently contacted Beverley Emmerson, TMBC's Sports Development Officer and Chair of the 3G Steering Group (BE), and told her that the school had transferred the funds.
- 5.15 I asked MW why he thought Mr. Garland had not raised this matter with him given that he (MW) presumably knew what the transfer was for. I asked whether he considered that Mr. Garland might perhaps have thought that the money should have come from somewhere else. MW told me that he thinks that Mr. Garland may have jumped to a conclusion regarding the amount, either because he thought it was more than the cost of the boiler, or perhaps because he felt that the school should have been using other funds to pay for it.
- 5.16 Beverley Emmerson (BE) then sent MW a '*curt and aggressive*' email expressing concern at the fact that this payment had been made without any authorisation from the Steering Group. MW responded the same day suggesting that the roles and responsibilities of the various parties to the CUA be clarified.
- 5.17 He also attached a copy of the CUA, highlighting the various paragraphs that in his view made it clear that application of funds to the cost of the new boiler was entirely appropriate. He also pointed out that the CUA does not require the school to secure authorisation from the Steering Group for any expenditure and that the financing and management of the facility are the preserve of the school.
- 5.18 Further email exchanges followed in which BE inter alia questioned the fitness for purpose of the CUA but in due course TMBC confirmed that the school had not in fact contravened the terms of the agreement.
- 5.19 As it had been raised in some of the correspondence with which I had been provided at the outset of the investigation, I asked MW to clarify the relevance (if any) of the dismissal of the School's former Business Manager, Mrs Jean Pankhurst, to the matter of Mr Garland's querying of the transfer and the complaint against the three councillors. His response was as follows:

*'My position is that I have always been open with the steering group about the financial arrangements as demonstrated by the fact that I brought my concerns to that group when we had had to suspend the Business Manager back in December 2014. However, it is my belief that certain members of the group including Cllrs Rayner and Taylor, believe that during the period of poor financial management by the ex-Business Manager, funds generated by income from the 3G pitch were being used to fund expenditure in other areas of the school. There is no evidence of this, but there is evidence that the income figures reported to them by our ex-Business Manager were inflated, and that is where I believe their perception of there being more money came from.'*

- 5.20 Turning now to the events of Friday 4 March, MW received an email from BE at 11.30am that day 'insisting' on a full reimbursement of the £11,295 and requiring an emergency meeting at 4.30pm that afternoon. MW replied that he could not meet that day but suggested a full examination of the issues at a scheduled meeting due to be held some 11 days later. A copy of that exchange of emails is at **Appendix 3**.
- 5.21 Later that day, at around lunchtime, Cllr Rayner arrived at Reception and asked to see MW. He wanted to talk to him about the expenditure and to see if he could help avoid the situation getting out of hand. Sue Reeve, the School Receptionist, spoke to MW's PA, Mrs Rachel Martin (RM) who in turn tracked down MW who was on duty in the playground. MW told her to tell Cllr Rayner that he could not see him that day as he was on duty at that time and fully committed for the remainder of the day. RM did so, and also told Cllr Rayner that MW had received and replied to BE's email of that morning and that he would forward a copy of that email to him (he subsequently did so). Cllr Rayner then left, having been on the premises for perhaps ten minutes.
- 5.22 Later that afternoon, MW was in a meeting with some parents and shortly after they had left, while he was reviewing the week with the Deputy Head, Michael Cater, RM hurried into his office and told him that Cllrs Rayner, Betts and Taylor were in Reception demanding to see him. He decided to go and see them. He collected his bags and coat, went out to Reception and expressed surprise that they were there given that Cllr Rayner had already been told that he could not see him that day. He told them that on Fridays he had to leave by a certain time to collect his son from a schoolfriend's house and take him home.
- 5.23 The councillors said that they did not need long but MW said to me that the fact that they had arrived unannounced made him less inclined to accede to their request, even for a short meeting. He told them that he had been in touch with BE and had suggested to her the date of a scheduled meeting at which the issues could be sorted out.
- 5.24 MW then told the Councillors that he was leaving and either Cllr Rayner or Cllr Taylor said "*Well, good luck with that mate*" in a 'cocky' way. MW did not appreciate what was meant by that remark until he stepped outside and saw that Cllr Taylor's van had been parked in such a way that his (MW's) car was completely boxed in, parked nose to the fence and flanked by cars belonging to other members of staff. Cllr Taylor's van was parked behind and in line with MW's car, a matter of one or two feet away from it.
- 5.25 When MW came back into Reception he saw all three councillors '*nudging and winking at each other as if the whole thing was a huge, hilarious joke*'. MW told them that their behaviour was ridiculous and that he had to leave immediately to pick up his son. They simply repeated that they needed to speak to him and would not listen to what he had to say. MW told them that they were behaving like bullies and that they should be ashamed of themselves. They refused to move the van and MW said that he would have to call the police. The response was again "*Good luck with that – we'd love to talk to the Police*".
- 5.26 MW told me that he had had to focus on 'remaining the adult' and not rising to their behaviour. He felt as though they were trying to goad him into reacting.
- 5.27 Cllrs Rayner and Taylor were standing next to each other, grinning at each other, and Cllr Rayner appeared to be saying "*Well done*" to Cllr Taylor, as if they were sharing a private joke. Cllr Betts' demeanour was slightly less provocative although MW said that he (Cllr Betts) could have chosen to leave at any time had he thought that the situation was getting out of hand. Given that he did not do so, MW feels that they were all as bad as one another.

- 5.28 MW is convinced that Cllr Taylor could easily have parked somewhere else in the car park without blocking him in and that that Cllr Taylor knew very well which was his car and that blocking him in was a quite deliberate act.
- 5.29 MW then called the Police (on 101) from his office explaining the situation. He told them that he did not consider that he was in any danger. In the event, the police were unable to send anyone to the school until after all concerned had dispersed, but they did subsequently take statements.
- 5.30 Shortly afterwards, Cllrs Rayner and Betts and left and reappeared by the school gates with Cllr Taylor who left his van blocking MW's car in and walked to the gates to join the other two. The three of them stood by the gates, apparently taking 'selfies' of themselves with MW's car and MT's van in the background – MW watched this from his office window and photographed them doing so.
- 5.31 MW & Deputy Head Michael Cater (MC) were 'stunned and disbelieving' of what had happened. Eventually the three councillors disappeared. MW and MC looked at the car situation and because the cars flanking MW's had now gone, MW was able to extract his car from in front of Cllr Taylor's van. He then parked it next to the van and took a photograph of the two vehicles. He, MC and RM then locked up the school and made to leave but as they did so, the three councillors appeared from behind the 3G changing rooms and were taking photos of them. MW wanted to get away and he and the others drove off.
- 5.32 When he reported the events of the day to Chair of Governors Sheila Smith, she wrote to the three councillors banning them from the school premises. The Police came to the school and took statements on Monday 7 March.
- 5.33 A photograph which later appeared as part of a report on the incident in the Sevenoaks Chronicle (see **Appendix 4**) was taken after MW had managed to manoeuvre his car out after the cars either side had gone - see further below. MW said that the school did not respond to the article in the Sevenoaks Chronicle, feeling it was better to maintain a dignified silence.
- 5.34 The first subsequent contact was an email of 9 March from Cllr Rayner, copied to Darren Lanes (BE's Line Manager), to BE and others (See **Appendix 5**). Others to whom the email was copied included Pat Darby who is a BG Parish Councillor and Pete Donovan, a local man who volunteers for one of the football clubs.
- 5.35 MW takes particular exception to the references to a 'slush fund' and his 'golden handshake'. MW has no plans to leave the school and does not know how this suggestion originated. He said that Cllr Rayner claims to have got the notion from one of the Governors but added that the Governors all denied speaking to him about this.
- 5.36 MW also confirmed that although she had lodged an Employment Tribunal claim, Mrs Pankhurst was not taking action against him personally.
- [NB, I was subsequently advised that Mrs Pankhurst's claim was withdrawn after the case had opened and she was ordered to make a contribution to the School's costs].*
- 5.37 MW spoke to his trade union about Cllr Rayner's email. They felt very strongly that the Governors should address the issue. The Governors agreed and instructed a solicitor to write a 'cease and desist' letter to Cllr Rayner.
- 5.38 MW confirmed that the complaint against the three councillors encompasses the email of 9 March from Cllr Rayner as well as the events of 4 March.

- 5.39 MW told me that Cllr Betts' children subsequently wrote to the Chair of Governors protesting that because of her ban, their father would not be able to watch them play football at the school – Mrs Smith wrote back saying that he would be welcome to do so if he wrote a letter of apology. He has not done so. MW described the children's letter as a 'cheap shot'.
- 5.40 MW summarised the behaviour of the three councillors as aggressive and intimidating in front of staff and one of the students at the school (See Mrs Reeve's statement below).
- 5.41 Michael Cater finally got rid of the three Councillors by citing the safeguarding regime and instructing them to leave.
- 5.42 MW concluded by saying that he had worked in education for twenty years in some of the most difficult areas of Kent (Wrotham not being one of them), and had dealt with difficult communities and difficult parents but had never experienced anything like this incident in which he was prevented from leaving his place of work.
- 5.43 He considers that all three councillors breached both cited paragraphs of the Code of Conduct, relating to respect, bullying and intimidation. He considers himself to be strong and resilient but admits that he was very shaken by the events of 4 March.

## **6. MR. MICHAEL CATER**

- 6.1 In accordance with my normal practice and with Mr. Cater's consent I made a digital audio recording of our conversation and used it as the basis of a draft note that I subsequently submitted to him for comment. He approved my draft with minor amendments and the following paragraphs are drawn from that note as amended.
- 6.2 Mr Michael Cater (MC) has been Deputy Head Teacher at Wrotham School for four years and has a wide range of duties including Teaching & Learning, staff appraisal, budgeting and generally assisting in the running of the school.
- 6.3 We spoke about the events of 4 March. MC was aware that Cllr Rayner had been to the school at lunchtime because MW had told him about the matter later in the day.
- 6.4 MC and MW generally have a weekly 'wash-up' meeting on Friday afternoon in MW's office, which overlooks the approach to the school's main entrance and during their meeting on the afternoon of 4 March, MW spotted the three councillors walking up the path towards the door.
- 6.5 MW asked MC to accompany him to Reception. Cllr Rayner 'declared' that they had 'come for the meeting' but MW explained that there would be no meeting as he was already committed for the remainder of the day and that he would have expected any such meeting to be properly booked in advance rather than demanded on the spot. He added that the proper forum for discussing the matter at issue was the 3G Steering Group, which holds regular meetings.
- 6.6 At that point, the three councillors refused to leave. Cllr Rayner appeared to be speaking for the group. He said that the matter was important and urgent. MC did not at that stage know the ins and outs of the financial arrangements in relation to the replacement of the boiler.
- 6.7 MW decided at that point to collect his belongings and leave so he and MC went back to his office. As MW walked out of the front door, he noticed that Cllr Taylor's van was blocking his car in, as it was flanked by cars on either side.

- 6.8 MC took some photographs, illustrating the position of the cars. MW then returned to the school building and said to Cllr Taylor (because it was clearly his van): *"Have you really blocked me in?"* Cllr Taylor just shrugged. MW commented that this was not an appropriate way of dealing with the matter. Cllr Rayner repeated his comment about the importance of the matter while the other two said nothing. He mentioned misappropriation of public money and said that he would not leave until he had had a meeting.
- 6.9 MW & MC returned to MW's office and then MC went back out to see the three councillors and told them that their behaviour was ridiculous and that they would have to leave.
- 6.10 MW phoned to make alternative arrangements to pick up his son from his friend's house and MC agreed that he would stay with MW until the situation (which MC described to me as 'quite intimidating') had been resolved. They then returned to Reception and MW told the councillors that if they did not leave, he would call the Police. He subsequently did so.
- 6.11 MC asked the councillors if they had signed in.
- [MC told me at interview that he thought that they had not signed in but Mr. Wright has since confirmed that they did all sign in, at 3.30pm and that Cllr Rayner had also signed in, at 1.30pm, on the occasion of his earlier visit.]*
- 6.12 MC declined to provide the councillors with visitors' badges and asked them to leave the site. They complied but as he walked past MW, Cllr Taylor said *"Good luck with moving that"* – a clear reference to his car. MC is quite clear that it was Cllr Taylor who said this. The three of them then went and stood outside the school gate where Cllr Taylor lit a cigarette and Cllr Betts started taking 'selfies' of them.
- 6.13 MC then went outside and took some pictures of Cllr Taylor's van and of the councillors at the gates.
- 6.14 After about 30 minutes they appeared to move away from the gates. By this time, the cars either side of MW's car had gone and MW was able, with guidance from MC, to manoeuvre his car out. They then locked up the school, MW having called the Police again and told them that the immediate problem had been resolved and that there was now no need for their attendance.
- 6.15 MC got into his car and Cllr Betts walked across the car park and took the (misleading) picture of MW's car and MT's van that later appeared in the Sevenoaks Chronicle. MC got out of his car and asked them again to leave. Cllr Rayner said: *"You can't do that - this is Council business"*. MC replied that this was a safeguarding issue and that he was within his rights to ask them to leave. Cllr Betts appeared to be filming or photographing using his mobile phone throughout. At this point, everyone left the site.
- 6.16 MC said that he had never come across such a bizarre situation in his 16-year career in schools. He added that professional etiquette demands a sensible and polite approach to the organisation of meetings and only in extreme emergency, perhaps involving the safety of a child, would a meeting be arranged at the drop of a hat. He said that the situation was so odd that he and MW had to remind themselves of what was happening and to ensure that they reacted appropriately and in a calm and sensible way.
- 6.17 MC said that Cllr Rayner did almost all the talking. Cllr Betts said almost nothing but the three of them were quite clearly acting as one. At times, there was eye communication and wry smiles exchanged between them.

- 6.18 MC is not sure what any meeting would have achieved and felt that the whole episode was more about posturing and gesturing. There was clear collusion – at any point, one of the councillors could have broken away on the basis that this impasse was not what they had come to the school for, but none of them did so.
- 6.19 MC estimates that from the time they arrived to the time they finally left, the councillors were on or around the school premises for about two hours.
- 6.20 He is sure that Cllr Taylor knew which was MW's car and that he had quite deliberately blocked it in.
- 6.21 MC had come across Cllr Taylor in relation to school events but had never spoken to him but he had had no previous contact with Cllrs Rayner or Betts, although he knew that they were members of the 3G Steering Group.
- 6.22 MC recalled that there was a girl in Reception whom Sue Reeve was looking after pending the arrival of her mother and that she removed her when the 'standoff' developed. Other children were aware that 'something was going on' out in the car park.
- 6.23 MC also commented: *"The kids were talking about the incident the following week"*. They asked whether Mr. Wright had been taken hostage, whether he was back at school and whether he was OK. MC is unaware of any parents complaining or raising any issues about the report in the paper and said that the staff dealt with any queries in a very low-key manner. He said that the report effectively dropped out of the news very quickly, despite Cllr Taylor trying to link it out through his Facebook page.
- 6.24 MC considers that the publicity given to the incident had the potential to undermine the authority and reputation of the school and its staff and although he is not aware that the school has suffered any reputational damage, it is conceivable that potential parents might be concerned about very public allegations of financial irregularities made untruthfully by people in positions of authority locally.
- 6.25 He concluded by commenting that Cllr Betts knew very well that the photo he took of Cllr Taylor's van and MW's car after MW had moved his car was going to be misleading and intended to deceive. The school did try to get the misleading photos taken down from the paper's website, but to no avail.

## **7. RACHEL MARTIN**

- 7.1 I next interviewed Mrs Rachel Martin (RM). In accordance with my normal practice and with her consent I made a digital audio recording of our conversation and used it as the basis of a draft note that I subsequently submitted to her for comment. She approved my draft with minor amendments and the following paragraphs are drawn from that note as amended.
- 7.2 RM is PA to MW and Clerk to the School Governors. She has been at the school for over 15 years and very much enjoys her job.
- 7.3 She told me that at about 1.30pm, on Friday 4 March, Cllr Harry Rayner arrived at the school and asked to see MW. RM went to find him and then relayed the message that he could not see him that day. She offered to help in any other way but Cllr Rayner declined and left the premises.
- 7.4 He came back at about 3.45pm with Cllrs Taylor & Betts. RM explained that MW was in a meeting with some parents and could not confirm whether he would be available after that meeting had finished. She offered to make alternative arrangements but this offer was

declined by the councillors who were insistent that they would not leave until they had seen MW.

- 7.5 MW's meeting with the parents finished and MW then came out of his office and attempted to leave but was unable to do so because Cllr Taylor had blocked his car in. RM was able to see this from her office window. Her office is between MW's office and the Reception area so she was aware of what was going on outside although she could not hear all that was being said or by whom.
- 7.6 RM was the last to leave (having locked up the school with MC) at about 5pm. She is not sure whether Cllr Taylor's van was still there at the time.
- 7.7 RM knew Cllr Rayner as a previous governor of the school and knew Cllr Taylor because he had been to previous 3G meetings. She had not come cross Cllr Betts before.
- 7.8 RM's involvement was in essence confined to '*relaying messages and shuttling*' between Cllr Rayner and MW and, later, between MW and the three councillors, explaining that whilst MW was not immediately available, she was happy to make alternative arrangements for them to meet him.
- 7.9 RM said that the councillors were not rude to her but that they made her feel very uncomfortable because they refused to leave and would not accept her offer to make alternative arrangements. She regarded Cllr Taylor's conduct in blocking MW in as '*extremely unprofessional*'.

## **8. SUE REEVE**

- 8.1 The final member of school staff whom I interviewed was Mrs Sue Reeve (SR). In accordance with my normal practice and with her consent I made a digital audio recording of our conversation and used it as the basis of a draft note that I subsequently submitted to her for comment. She approved my draft with minor amendments and the following paragraphs are drawn from that note as amended.
- 8.2 SR has been 'part of the school' for 31 years, firstly as a teacher and, for the last two years, as Receptionist.
- 8.3 She was on Reception on Friday 4 March when Cllr Harry Rayner arrived at lunchtime. SR and her husband (who is a Governor of the School) have known him for many years. He asked if he could see MW. SR went to find RM who then came out to see him. He left shortly after RM had told him that MW would not be available that day.
- 8.4 Just after school had finished, Cllr Rayner returned, with Cllrs Taylor and Betts (both of whom SR knows). They asked to see MW. SR did not know whether they had an appointment. She is aware that MW normally leaves slightly early on Fridays and told me that she would have been surprised if he had arranged an appointment at that time. She fetched RM, who told the three councillors that MW was unavailable but they refused to leave until they had had five minutes of his time. She said that Cllr Rayner was doing most of the talking.
- 8.5 SR was at that time looking after an eleven-year-old pupil who had missed her bus and was awaiting the arrival of her mother who was coming to collect her. SR took her away from the area because she felt it was not appropriate for her to be in the same room where a conflict appeared to be in the offing. She did not believe that there were any particular raised voices:

*'...just what amounted to harassment of the Head Teacher by the three councillors (mainly Rayner and Taylor). The reason I removed (the girl) was because I felt very uncomfortable that she was witnessing three adults verbally bullying her Head Teacher, something that we constantly tell our pupils is wrong and is not allowed. I had already made the decision to remove her from the situation before any mention of police involvement'.*

- 8.6 The girl's mother subsequently arrived to collect her.
- 8.7 MW then came out of his office and told the three councillors that he had to leave but they kept 'badgering' him. However, he could not leave because Cllr Taylor had parked his van behind his car and blocked him in – *'a very silly thing to do when there was plenty of space'*.
- 8.8 MW asked Cllr Taylor to move his van *'but they kept on about needing just five minutes'*.
- 8.9 Mr. Cater then asked the three councillors to leave and they eventually did so, although they were still at the gate when SR left the premises at about 4.15pm. SR had to be careful how she manoeuvred her car when she left because Cllr Taylor's van was behind her car, albeit not blocking it in.
- 8.10 When SR got home, she told her husband what had happened and he rang MW as he was concerned for him.
- 8.11 SR said that if children at the school had behaved in this manner, the staff would be concerned. She thinks that the three councillors *'let themselves down very badly'*. She added that the incident has made it difficult for her and that she now crosses the road to avoid any of them and she has also stopped patronising Cllr Betts' cheese business.
- 8.12 SR believes that all three councillors breached the cited paragraphs of the Code of Conduct – she thinks they were intimidating, by contrast with MW, who, she said, behaved impeccably throughout.
- 8.13 She said that Cllr Taylor *'has done some good things in the village'*, albeit he has always been *'a bit headstrong.'* Although she respects the fact that he fights for what he believes in, she considers it quite wrong to be rude and that his behaviour on 4 March was *'not becoming of a gentleman'*. She thinks that the three councillors should have left when asked to do so and arranged an appointment.
- 8.14 SR does not think that the newspaper report about the incident did the school any lasting harm and commented that a lot of local people know Cllr Taylor to be *'headstrong and outspoken'*.

## **9. MRS SHEILA SMITH**

- 9.1 Having met and interviewed the school staff, I met Mrs Sheila Smith, Chair of the School Governors (SS). In accordance with my normal practice and with her consent I made a digital audio recording of our conversation and used it as the basis of a draft note that I subsequently submitted to her for comment. She approved my draft with minor amendments and the following paragraphs are drawn from that note as amended.
- 9.2 Mrs Smith is the complainant in this matter. She has been in teaching for almost 50 years in various roles including a deputy headship and a headship. Since her retirement she has provided teacher training and now inspects British schools abroad.

- 9.3 She has been Chair of the Governors at Wrotham for three years. There are twelve governors altogether. None of the three councillors the subject of her complaint is a governor of the school, although Cllr Rayner was one for a short time after she joined.
- 9.4 She regards the school as a successful and happy establishment.
- 9.5 SS first became aware of the incident on 4 March when MW told her about the email from Beverly Emmerson (BE) in which she had demanded repayment of the disputed funds and insisting on an urgent meeting at 4.30 pm that afternoon. While SS was in the school, MW told BE that he could not meet that day as he was already fully committed.
- 9.6 MW subsequently telephoned SS in a quite agitated state and explained that the three councillors had arrived, demanded to see him, blocked his car in and refused to leave. SS volunteered to come into the school and speak to the three of them. She did go to the school, but by the time she had arrived from Crowborough, MW and the councillors had all left the school.
- 9.7 She spoke to MW later in the evening and he told her in some detail what had happened. She then sent an email to BE:

*From: [morillon@live.co.uk](mailto:morillon@live.co.uk)  
To: [emmerson@tmbc.gov.uk](mailto:emmerson@tmbc.gov.uk)  
Subject: Wrotham School  
Date: Fri, 4 Mar 2016 18:20:21 +0000*

*Dear Ms Emmerson,  
What happened this afternoon at Wrotham school was disgraceful and indeed criminal. In our opinion three members of your committee were guilty of aggravated obstruction and holding Mr Wright hostage in the school, both serious criminal acts. We will now consider our actions from here and I will meet with Mr Wright on Monday to discuss what we do. You will appreciate that what happened today makes it impossible for the school to work with the existing committee and we will be seeking professional advice as to how we move forward with the 3G pitch.*

*Yours Sincerely  
Sheila Smith  
Chair of Governors*

- 9.8 SS sent this email to BE in the latter's capacity as Chair of the 3G steering committee of which the three councillors are members as Parish representatives.
- 9.9 MW did not tell SS about Cllr Rayner's earlier visit that day.
- 9.10 Although SS banned all three councillors from the school site (as described to me by MW), she is aware that Cllr Rayner has subsequently been on site, but she has '*not risen to that*'.
- 9.11 She regarded their conduct as aggravated obstruction and, in effect holding MW hostage because he could not get his car out.
- 9.12 The boiler expenditure issue was discussed under AOB at a scheduled meeting of the Governors on 10 March and this led on to a discussion of the events of 4 March. Mr. Nigel Newman, one of the Governors who had himself been a Parish Councillor, felt that a complaint should be lodged. Mr. Newman secured details of the complaints procedure and passed it to SS who in turn sent her letter to TMBC.

- 9.13 SS wrote to the Monitoring Officer at TMBC on 18 March. The fact that the email from Cllr Rayner dated 9 March was impugning the Governors encouraged SS, rather than MW to lodge the complaint. The Governors were shocked and outraged by Cllr Rayner's email and the conduct of the councillors.
- 9.14 SS's understanding of the Community Use Agreement is that the use of the surplus income to replace the boiler (the need for which had been identified to MW by Mr Garland) was quite legitimate and she said that the aggression that the incident had generated came as quite a surprise to her (and others).
- 9.15 SS understands that the Leisure Development staff sought legal advice that culminated in confirmation that there had been no breach of the Community Use Agreement.
- 9.16 SS has no direct involvement with the 3G budget, although she is aware that MW has been keeping the Governors informed.
- 9.17 SS told me that the problems with Mrs Pankhurst that MW had described to me have no direct bearing on 'the boiler issue'. It was not a matter of her being 'on the take' but more of the provision of inaccurate information – she was painting a rosier picture than was actually the case and SS believes that this may have given the councillors the impression that there was a background of concern. Mrs Pankhurst has now been replaced by a new very good bursar.
- 9.18 SS had had no dealings with the three councillors other than seeing Cllr Rayner at some Governors meetings shortly after she took up her post. She has never met Cllr Taylor or Cllr Betts.
- 9.19 In conclusion, SS said that she was shocked by their behaviour, '*...which is the sort of conduct one would expect from teenagers*'.

## **10. THE COUNCILLORS' RESPONSE**

- 10.1 As noted above, the three councillors wished to be interviewed together and arrangements were made for me to see them at Potter's Mede on 6 July.
- 10.2 In accordance with my normal practice and with their consent I made a digital audio recording of our conversation and used it as the basis of a draft note that I submitted simultaneously by email the following day to all three councillors for comment.
- 10.3 Cllr Taylor approved my draft by return with minor amendments, but I did not hear from Cllrs Rayner or Betts until 2 August. They sent a joint response and made some amendments to and commented on the notes and sent their comments under cover of a lengthy email that raised a number of issues in relation to the events of 4 March. The following paragraphs are drawn from my notes as amended by the three councillors.
- 10.4 Following my introduction as to the purpose, format and terms of reference of the investigation, I asked why the three councillors had wanted to be interviewed together and had declined to be interviewed individually.
- 10.5 Cllr Taylor said that he had a 'fairly jaundiced' view of the whole Standards procedure and that his main concerns were that the investigation was not looking at the whole situation relating to what he saw as misapplication of funds by the school but only at what he described as the 'narrow issue' of the alleged behaviour of the three councillors which he believed had been taken out of context.

- 10.6 His instinct, upon learning that I was not going to investigate the alleged misappropriation of funds, was to decline to participate but in deference to his colleagues he wanted to support them and was therefore happy to participate.
- 10.7 Cllr Betts' perception is that as all three councillors are volunteer members of the 3G Committee, and attended the school on 4 March in that capacity, they should be interviewed as a committee.
- 10.8 Cllr Rayner said he had nothing further to add.
- 10.9 In response to a question from Cllr Betts, I clarified the exact nature of the brief I had been given by Mr. Stanfield and confirmed that I was concerned solely with the events of and their behaviour on the afternoon of 4 March and, in relation to Cllr Rayner only, with the contents of the email that he had sent to Darren Lanes at TMBC on 9 March.
- 10.10 I explained that my understanding was that the TMBC lawyers had concluded that there had not, as alleged, been a contravention of the Community Use Agreement.
- 10.11 Cllr Rayner said that at a subsequent meeting, TMBC Solicitor Kevin Toogood had apologised that that advice had been incorrect.
- [NB: I undertook to follow this point up and subsequently received confirmation from Mr. Toogood via Mr. Stanfield that no such apology had been given and that the advice that there had been no breach of the CUA stood]*
- 10.12 Cllr Taylor said that their alleged behaviour on 4 March came about as a direct result of the misappropriation of funds and that to view their conduct in isolation meant that I could not do my job properly. I pointed out that regardless of whether there had been any misappropriation of funds, there still remained in place standards of behaviour imposed by the Codes of Conduct by which as Parish Councillors, all three were bound.
- 10.13 Cllr Taylor said: *"All three of us did comply"*. I acknowledged that this was their view but explained that I had to decide whether I agreed with that assertion, the contrary view having been expressed by Mr. Wright and others.
- 10.14 Cllr Betts considers that the way in which they conducted themselves on 4 March (which he contends was entirely properly) had no bearing on the matter of the misappropriation of funds. He emphasised that a decision had been made by the 3G Committee that a meeting was necessary to address the allegation, that the Chair of the Committee, Beverley Emmerson had asked for a meeting and that this had led to the arrival of the three councillors at the school on 4 March.
- 10.15 I confirmed that I was well aware of why they went to the school but that it was the manner in which they conducted themselves while they were there that was the subject of the investigation.
- 10.16 I asked for clarification of the direct relevance of the Employment Tribunal case brought against the school by Mrs Jean Pankhurst, the school's former Business Manager, which matter had been mentioned in a lengthy email dated 24 May from Cllr Rayner to Cllrs Betts and Taylor and copied (I believe inadvertently) to me.
- 10.17 Cllr Rayner confirmed that Mrs Pankhurst had withdrawn her claim. He said that he had been prepared to provide a statement in support of Mrs Pankhurst and he considers that the Code

of Conduct complaint against him was motivated, at least in part, as a means of intimidating him and discouraging him from supporting Mrs Pankhurst in her claim against the school.

- 10.18 I then asked if one of the councillors could explain what it was that brought to their attention the allegedly inappropriate expenditure on the boiler.
- 10.19 Cllr Taylor said that some fifteen months previously the school had found itself in a very difficult position due to the loss of the services of Mrs Pankhurst. Arising from that, MW had asked for a meeting of the 3G Steering Committee and explained to that meeting that the school could no longer meet its obligations under the CUA. Flowing from that, a series of meetings was held at the beginning of 2015, culminating in the school asking the Committee to put someone forward from the Group to take over the day to day management of the 3G facility.
- 10.20 Phil Garland, an adult member of the football club, volunteered to take this on. It was agreed that funds that would be made available to pay him. For his part, Mr. Garland provided a much closer watch on the way in which funds were expended and the way in which income was collected and matched against the use of the 3G pitch. These matters had not received the attention they deserved when the arrangements had been under the management of the school. Mr. Garland is not paid wages as such - rather he is a contractor to the school.
- 10.21 Mr Garland drew the Committee's attention via an email to a statement he had seen which showed that some £11,400 had been removed from the 3G account.
- 10.22 Cllr Betts said that before this email came into the public domain, he had attended a 3G Committee meeting on 8 February 2016, a week before the expenditure referred to above had become apparent. Every aspect of the 3G pitch finances had been discussed in detail at that meeting, which was attended by MW.
- 10.23 An explanation for this action was sought but was not forthcoming. It subsequently transpired that the funds had not been paid out of the account in a way that might have been expected. There was no invoice / payment trail. Instead, it was block transferred to the school's account in such a way that the 3G Committee were unaware of what exactly was going on. Some £4000 of this money was not applied to the purchase and installation of the new boiler.
- 10.24 I asked Cllr Rayner what had prompted him to go to the school at lunchtime on 4 March. He explained that he had been at a meeting at the TMBC offices that morning and that BE had called him out of the meeting *'two if not three times'*, to keep him apprised of a potential meeting that he and other members of the 3G Committee had requested be arranged with MW.
- 10.25 Cllr Rayner explained that he was a former governor of Wrotham School. He had served two terms in this capacity, the most recent coming to an end in 2013. He was hoping that on 4 March, he would be able to have a quiet word with MW, with whom he had always previously been on good terms, to see if he could help diffuse the situation and head off a major problem. He wanted to suggest that MW speak to the 3G Committee whom, he felt, would be helpful to him, particularly if, for example, there was a cash flow problem.
- 10.26 Cllr Rayner said that in his view, the members of the 3G Committee were likely to be sympathetic to the management of Wrotham School if they were advised that the funds had been removed on a temporary basis for repayment at a later date once the School was in receipt of further funding.
- 10.27 I confirmed that I had seen copies of BE's email to MW at 11.32am on the morning of 4 March, 'insisting' on a meeting at 4.30pm that day and of MW's reply of 11.41am telling her

that he could not meet at that time but suggesting discussing the matter at a scheduled meeting some eleven days later. Cllr Rayner said he had not seen the email but imagined that it would have been along the lines that the Committee would want to seek a meeting.

*[As a point of information, the email (see **Appendix 3**) indicates that it was copied to a number of people including all three councillors, albeit they may not have picked it up as quickly as MW did and in fact Cllrs Rayner and Betts told me that neither of them had seen the email before they went to the school on the afternoon of 4 March.]*

- 10.28 Cllr Rayner said that he was aware 'that a meeting had been called (or called for?)'. He had not seen the email because he had been in meetings at TMBC and County Hall and he went directly to the school. He did not, at the time he set out for the school, know whether a meeting had definitely been arranged for 4.30pm that day, only that one had been requested.
- 10.29 On arrival at the school at lunchtime, Cllr Rayner saw RM who took him in to the Deputy Head's office and left him there while she went to see if MW might be available. Cllr Rayner explained that he just wanted a quiet word with MW to see if the situation could be defused. RM returned a few minutes later and told Cllr Rayner that MW could not see him then. Cllr Rayner accepted this and left.
- 10.30 I asked Cllr Rayner why he then went back to the school in the afternoon without confirmation that a meeting had been arranged and whether any of the three councillors had been advised that a meeting had been arranged.
- 10.31 He did not give a direct answer at our meeting but Cllr Betts said that he had texted Cllr Rayner to the effect that he (Cllr Betts) was already at the school. Cllr Rayner subsequently advised me that as Cllr Betts had sent him a text saying that he was at the school, he had no reason to doubt that a meeting had been agreed at the time he arrived there.
- 10.32 Cllr Rayner said that when he first arrived at the school, he sat in Cllr Betts' car while the latter had a 'speakerphone' conversation with Darren Lanes about how to approach the issue and he added that Darren Lanes had counselled caution about how they should conduct themselves in any meeting with MW, although he supported the meeting proceeding. This, Cllr Rayner said, meant that they were particularly careful to be polite.
- 10.33 I then asked Cllr Betts what had prompted *him* to go to the school that afternoon. He replied that it was with the intention of ascertaining whether a meeting was in fact going to go ahead and if not, to ensure that a meeting was scheduled as soon as possible, ideally within a week.
- 10.34 Cllr Taylor added that it had been agreed at an emergency 3G meeting held the previous day that whoever was available would go to the school on 4 March.
- 10.35 I asked again why the three councillors had arrived for a meeting when none of them had received confirmation that it had been arranged. Cllr Betts reiterated that they did so in order to ascertain whether the meeting was going to go ahead and if not, to try to make arrangements to meet on another day.
- 10.36 Cllr Taylor commented at this point as follows:

*"It is also far more difficult to refuse a meeting if the people for that meeting are already there. It's easy to fend off a meeting in the future by email but if people are there for a meeting that's already been suggested, it's far more difficult. Matthew Wright is a member of our Committee and we are entitled to encompass him in a meeting. He was, now that the*

*Business Manager had left, the school's representative and we simply wanted to see him, not in his capacity as Head Teacher but as the school's representative".*

- 10.37 I asked whether it was correct to say (as I had been told by Mrs Martin and others) that at some stage during the afternoon of 4 March, an offer had been made to arrange a meeting to be held at another time. Cllr Betts said that this did not happen.
- 10.38 Cllr Taylor said that when they first arrived at Reception, SR told them that MW was in a meeting with some parents and they said that they would wait, as they only wanted five minutes. They did not see the parents leave. Cllr Taylor said that MW did not offer another date or time.
- 10.39 Cllr Betts said that when his meeting had finished, MW came out into Reception and signed out. There is some dispute as to exactly what happened next. Cllr Betts said that he asked MW whether they could meet there and then but that as MW replied to the effect that he was *"not going to be press-ganged into this"*, there was no opportunity for Cllr Betts to ask whether it would be possible to meet at some other time. He said that he did not ask for another meeting because he did not get the chance to do so.
- 10.40 Cllr Betts said it was very clear that MW was not willing to meet them at that time and Cllr Taylor said that MW's exact words were *"I'm not going to be press-ganged into this"* and he (MW) also said that he had found BE's email (insisting on a meeting) very rude.
- 10.41 Cllr Taylor said to me that they were not trying to take MW away but just to secure five minutes with him to establish the situation.
- 10.42 Cllr Betts then said that MW had said something along the lines of *"I'm not meeting you until 15 March"* (when he was due to meet BE and the FA – this was not a 3G meeting). Cllr Taylor recalled that this meeting was subsequently held without committee members being invited, although in the past at least two committee members had attended.
- 10.43 Cllr Taylor said that MW then left the premises.
- 10.44 I asked how much time elapsed between MW's emergence from his office and his leaving the building. Cllr Rayner's initial estimate was *'about a minute and a half'* but he then revised this to *'less than a minute'*.
- 10.45 It was suggested at this point that I might view the CCTV footage for the period in question and although I agreed to follow this up, when I did so, with MW, it transpired that the footage is automatically overwritten every six days so it was no longer available.
- 10.46 In their response to my draft notes of our meeting, the Councillors said that they considered the School Reception area CCTV footage for the period in question to be critical. They said that they failed to see how the investigation could proceed with *'the complainant Mrs Smith withholding or at best failing to produce a CCTV recording that would clearly demonstrate that the allegations of behaviour likely to bring their Parish Councils into disrepute were false'*.
- 10.47 The discussion then turned to the blocking-in of MW's car. Cllr Taylor did not deny that his van was in a position *'that would have made it awkward'* for MW to get his car out, but he said that this was completely accidental, as the parking area was extremely busy. He added that he was late, having arranged to meet Cllrs Rayner & Betts earlier and he simply 'dumped' his van. He said that he did not know which was MW's car. Cllr Rayner added that he too did not know which was MW's car.

- 10.48 Cllr Taylor said that when they were told to leave the school (by MC), they left forthwith and that he left his van where he had parked it because, he said, he could not go back to get it.
- 10.49 I subsequently asked Cllr Taylor to clarify why he could not move his van, given that Cllrs Rayner and Betts had moved their cars. He replied as follows: *"I have no answer to that, save that (the other councillors') cars were in a direct line to the gate, my van was deeper onto school premises, we had been ejected with a threat of 'children's' safeguarding'; and as far as we were aware, the Police were speeding in to arrest us"*.
- 10.50 Cllr Betts said that as MW had told them that he was calling the Police at the same time as they had been told to leave, they were trying to oblige by doing what the school was asking them to do and at the same time, knowing that the Police had been called, they were not just going to leave the site completely. I subsequently asked Cllr Taylor why not, given that as I understood it, MW called the Police because he wanted the three Councillors and their vehicles off the premises.
- 10.51 Cllr Taylor replied as follows: *"For myself, I could not believe that Matthew Wright was so intransigent he would not give us the few minutes needed to explain his actions, I was still rather shocked by the way this seemingly mild man and his friend had gone so completely off the deep end"*.
- 10.52 Cllr Rayner refuted outright MW's estimate of fifteen minutes elapsing between their being asked to leave the building and them actually doing so. Cllr Taylor's recollection is that they left immediately they were asked to do so. Cllr Rayner said that he considers MW's allegation to be *'absolutely egregious and clearly intended malevolently and clearly disprovable by reference to CCTV'*.
- 10.53 He said that all three councillors were entirely polite, pleasant and respectful the whole time and that the complaint was a *'tissue of lies and exaggeration'*.
- 10.54 In relation to the allegation of Cllr Taylor's van blocking MW's car in, Cllr Betts commented that MW did leave and went home and that he could not therefore have been blocked in.
- 10.55 Cllr Rayner denied saying anything along the lines of *"Good luck with that mate"* when MW indicated he was going to leave and said that he did not hear Cllr Taylor say it. For his part, Cllr Taylor confirmed that he did not say it, nor did he hear Cllr Rayner say it. All three councillors contend that the allegation that this was said is a complete fabrication on the part of MW & MC and that the allegation was made *'to hype the whole thing up'* (Cllr Taylor).
- 10.56 Cllr Betts referred to MW's reference to the possible removal of fence panels (see the letter of complaint) in order to secure the release of his car and queried why he did not ask a member of staff to move their car. He believes that the reference to removal of a fence panel was a further attempt to dramatise the situation.
- 10.57 All three councillors denied that MW asked MT to move his van.
- 10.58 I asked Cllr Taylor when he first became aware that he had blocked MW's car in. He replied *"When he started shouting his mouth off"*. This was a second conversation, involving MC and separate from that in which MW had allegedly referred to being *'press-ganged'* and lasted, according to Cllr Rayner's estimate, about fifteen seconds. Cllr Rayner said that he had no recollection of any reference to a van blocking a car and that if it had been mentioned, he would not have been aware of its significance.

- 10.59 All three councillors confirmed that there did come a time when they were aware that Cllr Taylor's van was blocking MW's car in. I asked whether Cllr Taylor had offered to move it. He replied, *"I never really got the opportunity"*.
- 10.60 Cllr Rayner said that MW went off to call the Police and that MC *"made it abundantly clear that our immediate priority was to leave the school forthwith, and we did"*.
- 10.61 I asked Cllr Taylor whether MW had at any time asked him to move his van and / or whether he had felt it appropriate to do so. He replied *"No. He never asked us to move and once we were told to leave the premises, we walked straight to the gate."*
- 10.62 Cllr Betts said that the important point was that the Police had been called and that *'you shouldn't move the evidence around - that would not be a good move'*. Cllr Taylor said that this was why he made a conscious decision not to move his van and because they had been told to leave the premises.
- 10.63 I subsequently asked Cllr Taylor why he made that decision when it was apparent that it was the van that had prompted MW to call the Police.
- 10.64 He replied as follows: *"The point is that an allegation has been made to the Police that my van was blocking Matthew Wright's car, I was not going anywhere until we had exhausted the possibility of him talking to us, so the van is best left where it was so the Police can decide whether an 'offence' has been committed"*.
- 10.65 Cllr Rayner said that he was not at this stage aware of the nature of the problem. He said that MW left Reception, walked down the path, and then came back again shortly afterwards. He added that at no stage was he (Cllr Rayner) aware that Cllr Taylor's van was *'the problem.'* He said he thought that when MW returned from his walk down the path, he had changed his mind about meeting them.
- 10.66 He added that he and Cllr Betts drove their cars (which were parked next to each other) out of the school premises and that Cllr Taylor walked to the gate where the three of them remained for some 15 – 20 minutes, for the Police to arrive. They then walked round to the 3G Pitch and had a cup of tea. They then walked back through the school playground, Cllr Taylor picked up his van and they left.
- 10.67 In a subsequent exchange of emails, I asked Cllr Taylor why he had moved his van then and not earlier, bearing in mind that he presumably did not know at that stage that the Police were not going to arrive and whether the concern about moving evidence no longer applied. His response was as follows:
- 10.68 *"We had actually walked back into the school, saw MW's car had been moved, the Police had not arrived, MW was clearly leaving so I took my van and left"*.
- 10.69 I asked Cllr Betts about the reference in his letter of 9 March to Mrs Smith to his being *'made responsible for another person's actions'* and asked him which person(s) he was referring to.
- 10.70 He replied as follows: *"In general. The allegation is that I was preventing Matthew Wright from leaving the school. I don't condone aggressive or intimidatory behaviour and if his car was partially obstructed, that's not my van – I shouldn't be made accountable for the action of someone else's vehicle parked in a position that might have obstructed Mr. Wright's car."*
- 10.71 I put it to Cllr Betts that he appeared from the letter to be seeking to distance himself from the conduct of the other two councillors. His response was that he was distancing himself from blame for the position of the van. He said that the letter was aimed at explaining that he had

previously enjoyed a very positive relationship with MW and that he would never condone behaviour that would prevent him leaving the school premises. He would also not take responsibility for someone else's vehicle that was perceived to be blocking him in.

- 10.72 I then referred Cllr Betts to his letter of 12 April to Adrian Stanfield in which he made a reference to events continuing '*beyond my control*' and asked him who had been in control if not him. He said that it was MW and MC. As soon as he learned that the Police had been called, it was '*game over*' as far as he was concerned. He said at our interview that that they were told to wait for the Police but when I later sought clarification as to who had told them to do so, he simply said, "*We then waited for the Police*".
- 10.73 Cllr Taylor said that if the three of them had really been causing problems, MW, as Head Teacher, should not have decided, as he did, to sign out and go home at the outset.
- 10.74 Cllr Betts said that if RM had, as MW alleged, been 'running down the hall', MW would not (or should not) simply have walked out and signed out as if there were no problem – therefore there was no problem. "*We must have been acting correctly, within the Code of Conduct, because he signed out and went to leave. A Headmaster's responsibility is to his staff and pupils and if he had been concerned that there was any intimidatory behaviour, he would not have signed out straightaway and left his school*".
- 10.75 Cllr Rayner denied that he in any way intimidated RM, whom he has known for some thirty years.
- [I confirmed that RM had told me that whilst none of the three councillors was rude to her, they had made her feel very uncomfortable because they refused to leave and would not accept the offer of alternative arrangements for a meeting.]*
- 10.76 Cllr Betts said that RM did not ask them to leave and that they did not at any time refuse to do so and Cllr Rayner added that RM did not offer an alternative meeting time. I subsequently asked for absolute clarification on whether RM offered to make alternative arrangements for a meeting, with or without having first consulted MW, with or without suggesting a specific date or time.
- 10.77 Cllr Rayner said that no offer, firm or otherwise, was made regarding an alternative meeting with the 3G Pitch Committee. He said that he '*knew from long experience*' that RM would in any case not have made any offer of any future meeting without first speaking to MW, who was in a meeting with parents.
- 10.78 Cllr Rayner denied that it was clear that MW was not willing to meet them there and then because RM had merely told them that he was in a meeting with some parents and that the three of them said that they would wait until he had finished that meeting to see whether he would have time to talk to them.
- 10.79 He said that MW left the building, walked down the path towards the car park and then turned round and came back. He said that he thought that this was an indication that MW had changed his mind about meeting them but now believes (although he did not realise it at the time) that MW came back because his car was allegedly partially obstructed by Cllr Taylor's van.
- 10.80 I suggested that there came a time by which it was quite clear to the three councillors (however that clarity came about, whether by actions or words on the part of MW or otherwise) that MW was not willing to meet them there and then. All three agreed that that clarity did not come about until MW told them that he was calling the Police and MC spoke to them about their lack of passes and safeguarding issues and asked them to leave.

- 10.81 Cllr Taylor said this: *"We were actually signed in, we just had not drawn passes because we did not know whether we would be staying or leaving the reception and physically entering the school. This is a crucial point. We were entitled to be there"*.
- 10.82 Whilst Cllr Rayner said that he did not realise the alleged partial obstruction by Cllr Taylor's van until they were off the school premises, they did acknowledge with hindsight that MW's return to the building must have been brought about by his realisation that his car was blocked in although they said that he did not mention this to them when he re-entered the building.
- 10.83 I then asked about contact with the Sevenoaks Chronicle and how the paper had come to learn about the events that unfolded that afternoon. Cllr Rayner said that the paper had called him.
- 10.84 I asked how they had found out about the incident. Cllr Rayner said: *"Who knows? – it could have been a pupil or a teacher"*.
- 10.85 I asked all three councillors if it had been one of them. Cllr Rayner initially made no reply and Cllr Taylor said that he could not deny doing so but added *"It's the sort of thing I would have done"* but he said that he could not recall phoning the paper, although he definitely responded.
- 10.86 Cllrs Rayner & Betts then said that they did not ring the paper. Cllr Taylor reiterated that he could not remember but had the paper contacted him *"I would have given them everything I'd got"*.
- 10.87 I then asked Cllr Rayner about his email of 9 March to Darren Lanes, which had also been encompassed within the complaint. He simply said that he stood by everything he wrote in the message and that the matter was still in the hands of his solicitors.
- 10.88 I put it to the three councillors that they appeared to be saying that quite a lot of what RM & MW had told me was simply untrue. They agreed. Cllr Betts said for example that they did not refuse to leave, as alleged by RM, nor did she offer to make arrangements for them to meet MW at another time. *"She made that up, just as (MW) made it up that she (RM) went running down the hall – I didn't see anyone running anywhere"*.
- 10.89 Cllr Rayner said: *"This is an absolute tissue of fabrications and you have to bear in mind that these people are long-standing employees whose jobs are at stake here and I want to be very careful about accepting statements from those who are in subordinate positions and perhaps subject to undue influence"*.
- 10.90 Cllr Taylor commented as follows: *"What's really sad about this is that these are people we've had very good relationships with for many years and because of the way it's been escalated by the school we're never going to get back to the situation as it was before. It can never heal"*.
- 10.91 Cllr Rayner: *"I've been an active and long-term supporter of the school"*.
- 10.92 Cllr Betts: *"We're all volunteers and I've done a lot of work for the school, not just for the 3G pitch."* Cllr Betts had for example offered to reinstate the school's vandalised rugby goal posts with his farm's tractor.
- 10.93 Cllr Rayner also said that Mr Garland had asked whether Cllr Betts could bring his tractor to the field to flail the thistles round the edge but he was unable to do so because of the ban

that had been placed on him entering the school premises. He added: *"We really aren't a bunch of thugs who went in there threatening mayhem and looking to hold people to the bulkhead – it wasn't like that at all. This whole thing is a tissue of lies"*.

- 10.94 I asked why, given the previously good relationships, they thought MW might have set this ball rolling. Cllr Taylor replied: *"Because he's strapped for cash"*.
- 10.95 Cllr Betts said that he could not understand, how, following a lengthy meeting a week earlier (to which MW had contributed) when detailed consideration was being given to how the financial situation might be improved, some £11,000 suddenly went out of the 3G account without MW mentioning that he was proposing to spend £7000 on a new boiler. Had he done so, consideration could have been given to alternative sources for materials and equipment that might well have been cheaper.
- 10.96 I asked whether any of them felt that MW had been 'on the back foot' when they arrived hoping to meet him. None of them replied directly but Cllr Betts just said that they did not know whether MW could make the meeting.
- 10.97 Cllr Rayner considered that there were *'a couple of existential threats'* to the school, which was *'down about £100,000 as a result of either fraud or mismanagement on the part of Mrs Pankhurst'*. He contends that MW must have known at the earlier meeting what he was going to do to fund the replacement boiler.
- 10.98 Cllr Betts confirmed that MW came out of his office, signed out, said that he would not be press-ganged, that he had found Beverley Emmerson's email very rude and that he would be meeting the FA with her on 15 March. He then left the building and returned a few seconds later and said he was calling the police.
- 10.99 Cllr Betts added that as a former school governor and the father of two young children, he knew how to conduct himself on school premises. MT added that he had been a youth worker for ten years.
- 10.100 Cllr Rayner said he thinks that SR's removal of the child who she was looking after pending the arrival of her parent was probably prompted by MC raising his voice when asking them to leave. Cllr Betts said that MW saying that he was calling the Police might also have prompted it.
- 10.101 Cllr Betts considers that he and his family have been disproportionately and unfairly affected by the ban on him entering the school premises and he found the simultaneous request for an apology through his children and the lodging of a Code of Conduct complain incongruous. He provided me with copies of the correspondence exchanged with the school.

## **11. FOLLOW-UP TO THE INITIAL INTERVIEWS**

- 11.1 As noted above, I did not receive a response from the councillors to my draft notes of our meeting until 2 August. Their response raised a number of queries and issues (including direct contradictions of what I had been told by the school staff) that needed exploring with the staff but by this date the school had broken up for the summer holidays and although I sent emails to the Head Teacher and others shortly after 2 August, it is not surprising that I did not receive replies to all these points for some weeks.
- 11.2 I make this point only by way of explanation as to why this stage of the investigation took rather longer than I had hoped or anticipated.

11.3 In addition to double-checking certain matters with the staff, I contacted both Beverley Emmerson and Darren Lanes. In the interests of clarity, I set out below my questions to and the responses from each of these follow-up exchanges in the order in which the people concerned appear above.

**(1) MR. MATTHEW WRIGHT**

11.4 I begin with Mr. Wright. My questions and his replies were as set out below.

11.5 I asked him to confirm whether it was correct to say that until the events of 4 March, he had enjoyed a cordial and constructive relationship with the councillors concerned. He said that he had, as far as Cllrs Rayner & Betts were concerned, and that although his relations with Cllr Taylor had been '*mixed*', they had been '*OK*' more recently.

11.6 The councillors having taken issue with his assertion that Rachel Martin had '*hurried*' into his office, I asked MW to confirm whether this was an accurate description. He said that it was.

11.7 He could not now specifically remember whether during the exchange in Reception he had offered to meet the councillors at some other time.

11.8 I asked for his reaction to the suggestion that was put to me that after his meeting with the visiting parents had finished, he simply signed out, said something along the lines of "*I'm not going to be press-ganged into this*" and left the building. He was adamant that this was not what happened.

11.9 He agreed that he may at some stage during his exchange with the councillors have said something along the lines that he considered Beverley Emmerson's email insisting on a meeting that day to be very rude.

11.10 I asked Mr. Wright to think carefully about timing, given the emphasis placed on the matter by the councillors. He said that their exchange of words did not last very long but he stands by his estimate of 15 minutes as being the length of time that elapsed between the councillors being asked to leave the building and them actually doing so.

11.11 I asked him what made him so sure that Cllr Taylor (and possibly the others) knew which was his car, given that they all denied knowing which was his car. He responded as follows: "*The comment made to me after I told them I was leaving,- 'Good luck with that' strongly suggests that they knew I could not leave; the fact that when the three of them did eventually leave the site, Rayner and Betts left in their cars and Taylor left by foot leaving his van blocking my car - why would he not leave in his van too if he did not know it was my car?*"

11.12 I asked him if he was convinced that one of the Councillors said something along the lines of "*Good luck with that mate*". He replied "*Absolutely*". He was also convinced that all three councillors were aware that Cllr Taylor's van was blocking his car in and that they found this very amusing.

11.13 I asked why he decided to call the Police and specifically whether it was solely because his car was blocked in or because he feared for his safety and security or that of the school. He said that he had made it clear to the councillors that he needed to leave the school in order to collect his son and that they were preventing him from doing so.

11.14 I told Mr Wright that It had been put to me that if there had really been a significant problem arising out of the presence of the three councillors, he would not (or should not) have signed out and made to leave the school. He said that his priority was to collect his son from school

and that it was him that they wanted to see, not someone else if he was not available. He said that by leaving he was not leaving a problem at school.

- 11.15 He described this as *“a bizarre point to make anyway, as it was they that turned up unannounced and were behaving in such an inappropriate manner. It is ridiculous that they would then suggest that I have done wrong by leaving them there to continue to behave in such a way to others”*.
- 11.16 I asked whether he or anyone else in his hearing told the councillors to wait for the arrival of the Police. He said that neither he nor anyone else had done so and that the councillors left the site and chose to stand by the school gates.
- 11.17 I asked whether he knew how the Sevenoaks Chronicle got hold of the story about the events of 4 March. He said that he did not, *“but given the first photo they printed which showed Taylor’s van next to my car and that the story was only a version that differed greatly from my own account, I would be confident in stating that it was one of the three that contacted the chronicle. The photo was shot from the angle that the three appeared from at the end of the whole incident when I had manoeuvred my car from being blocked in and was just leaving”*.
- 11.18 Finally, I asked Mr. Wright whether he had been ‘*on the back foot*’ about the school’s financial situation on 4 March. He denied this, adding that the school has been in a healthy financial position for the last two years and had had successful external audits.

**(2) MR. MICHAEL CATER**

- 11.19 Mr. Wright having initially gone to speak to the councillors by himself, I asked Mr. Cater how long it was before he joined them. He told me that it was about five to ten minutes.
- 11.20 Given the councillors’ denial that any of them said anything along the lines of *“Good luck with that mate”*, I asked Mr. Cater to think very carefully whether he did in fact hear one of them say it. He said that he was absolutely sure that Cllr Taylor said it and equally certain that Mr. Wright had asked Cllr Taylor to move his van.
- 11.21 I asked Mr. Cater for his recollection as to the stage at which Mr. Wright decided to call the Police and why. He told me that this was after trying to get into his car, returning to the school, not being able to move it and asking Cllr Taylor very clearly to move the van. He made it very clear that he needed to pick up his child and they did not move the van that was obstructing his car. He then called the police. The councillors were also initially refusing to move or leave the site until they had had the meeting they were demanding based on what (Mr. Wright and Mr. Cater) knew for a fact were false claims and slanderous allegations.
- 11.22 I asked Mr Cater whether he or anyone else in his hearing told the councillors to wait for the arrival of the Police. He said that he did not remember but added that the councillors were aware that the police were coming as (Cllr Rayner) made it clear they would like to also talk to the police about *‘their own false financial allegations’* they were making against the school.
- 11.23 Finally, I asked Mr. Cater about timing. His estimate is that the councillors were on site (either in Reception or by the school gates) for about two hours from approximately 3.30pm.

**(3) MRS RACHEL MARTIN**

- 11.24 Mrs Martin confirmed (*‘I am 100% positive’*) that when she told Cllr Rayner at the time of his lunchtime visit that Mr. Wright could not see him, she did offer to arrange another time for a meeting.

- 11.25 Mrs Martin had told me at interview that when they were at the school later that day the three councillors had made her feel very uncomfortable because they refused to leave and would not accept the offer of alternative arrangements for a meeting. I wanted to establish whether she stood by that assertion, particularly as it had been put to me that she did not offer an alternative meeting time.
- 11.26 I told her that I had subsequently asked the councillors for absolute clarification on whether she offered to make alternative arrangements for a meeting, with or without having first consulted Mr. Wright, with or without suggesting a specific date or time. I told her that Cllr Rayner had said that no offer, firm or otherwise, was made by her regarding an alternative meeting 'with the 3G Pitch Committee' and that he had said that he knew from long experience that she would in any case not have made any offer of any future meeting without first speaking to Mr. Wright, who was in a meeting with parents.
- 11.27 This was her response: *'I stand by this, as they were adamant they were not leaving the site until they had seen Mr Wright. Although they were not rude or aggressive towards me they made me feel uncomfortable by their persistence and unwillingness to leave the site.*

*'I am adamant that I offered to make an appointment for the three gentlemen to meet with Mr Wright. I had a notebook and pen with me in Reception to make a note of the times etc. (Cllr Rayner's) words "from long experience that I would in any case not have made any offer etc" - are his own interpretation and opinion and not fact.*

*I manage Mr Wright's diary on a daily basis and regularly make appointments with people without having to consult with Mr Wright first. I would do the same for any parent or stakeholder who turned up demanding to see a member of staff. I am a professional PA to the Head Teacher and the most obvious thing would be to offer to arrange an alternative time for a meeting which is what I did'.*

#### **(4) MRS SHEILA SMITH**

- 11.28 When I advised the councillors that the CCTV footage from the afternoon of 4 March had been overwritten, Cllr Rayner responded at some length and given what he had to say, I forwarded the text of his email as set out below to Mrs Smith for her comment. For the sake of completeness, The relevant part of his email of 2 August upon which I invited Mrs Smith's comment reads as follows:

*"I have undertaken my own inquiries in connection with the alleged loss of CCTV images of the events of the afternoon in question. As you know I am still in touch with Members of Wrotham School Governing Body. I am advised that before Mrs Smith made her complaint to the T&MBC Monitoring Officer, she was in touch with some and perhaps all of the Governing Body/Directors of Wrotham School Limited. At this time her attention was drawn, by at least one of those with whom she was in contact, to the fact that the School Reception was covered by CCTV.*

*Another says that Mrs Smith made reference to CCTV herself. At least some Governors knew (as I did myself) that the School Reception was covered by CCTV. My understanding is that at the direct request of Mrs Smith, the relevant CCTV footage was 'lifted' from Wrotham School's CCTV system and copied onto 'recordable media' such as a 'memory stick', a CD, or a portable hard drive which remains available to Wrotham School Management. I am sure that Mr Wright is wholly correct in that the original images held on the School CCTV system, have long since been overwritten. Your email make no reference as to why this was not preserved.*

*Could it be that the Wrotham School CCTV images have not been brought forward as evidence because the evidence does not support either Mrs Smith's letters to the three Councillors dated 7<sup>th</sup> March or the complaints made by her and Wrotham School staff against the three Councillors to the T&MBC Monitoring Officer?*

*My understanding is that in the meantime, the Wrotham School 'corporate line' is that 'everyone' forgot that the School Reception area (where the alleged inappropriate behaviour took place) was covered by CCTV and so no attempt was made to preserve crucial CCTV images, in time for them to be saved as evidence.*

*Have you interviewed Mrs Smith please? She is after all the Complainant. Can she confirm that she was in touch with Governors/Directors following the events of 4<sup>th</sup> March 2016?*

*If she confirms she was, can she also confirm that her attention was drawn by any of them to the School CCTV in Reception. If so what steps did she take to preserve such valuable evidence?*

*If she denies being in touch with fellow Governors/Directors, under what authority did she act, in writing to the 3 Councillors on 7<sup>th</sup> March and subsequently to the T&MBC Monitoring Officer, without taking steps to protect such precious evidence from destruction? The request to question Mrs Smith (and her fellow Governors/Directors) is not requested lightly. You are interviewing Mr Wright who appears to be answering apparently truthfully, but not wholly so, whilst Mrs Smith holds an 'umbrella' over him by apparently concealing evidence that if produced would show that this whole episode is a fraudulent charade.*

*Mrs Smith is a 'Non-Executive Director' that is to say that she is not 'employed full time' by Wrotham School. Has any evidence such as Board/Governor Minutes or similar, authorising her to undertake the actions that she undertook, been presented? In other words on whose authority was she acting?*

*Wrotham School Management described (wholly untruthfully) the three Councillors behaviour as '.....aggressive and intimidating in front of staff and students...'..... ' In four years as Head Teacher and 11 years as School Leader have never experienced such appalling behaviour...'. Yet, such alleged behaviour was not apparently such as to save the CCTV images of same?*

*The current offer from Wrotham School that you and the Monitoring Officer, are apparently being asked to accept, is that The Chairman and Vice Chairman of Governors, The Head Teacher and Deputy Head Teacher, their Personal Assistant (RM) and the Receptionist, all failed to realise that the alleged misbehaviour was recorded on Wrotham School CCTV and all apparently failed, not only to protect the evidence, but actually did nothing effective to prevent its loss. The Chairman of Governors was however sufficiently alert to write to the three councillors taking steps to prevent their returning to the School whilst lodging a complaint with the Monitoring Officer based wholly on fabricated testimony and all the while failing to protect valuable CCTV evidence.*

*Wrotham School Management described (wholly untruthfully) the three Councillors behaviour as '.....aggressive and intimidating in front of staff and students...'..... ' In four years as Head Teacher and 11 years as School Leader have never experienced such appalling behaviour...'. Yet, such alleged behaviour was not apparently sufficient (according to Mr Wright) for him to arrange to preserve the CCTV footage.*

*Or as the accused Councillors will contend, it was examined, copied behalf of the Chairman of Governors and found not to match the untrue allegations and therefore discarded for the purposes of evidence on behalf of the School. The three councillors accept that it has now been overwritten – how convenient for our accusers."*

- 11.29 Mrs Smith's response was short and to the point. She said that she was '*shocked and angered by the content of Mr Rayner's email all of which is sheer fantasy*'.
- 11.30 She said that no one was aware that Cllr Rayner and Cllr Taylor had offered themselves as witnesses for Mrs Pankhurst until June 10, just before the beginning of the Tribunal hearing on June 13 and that this could therefore not have had any influence on the Governors' decision to make the complaint about their behaviour.
- 11.31 Mrs Smith sent me a copy of the minutes of the full governors' meeting held on March 10th less than a week after the event, from which it can be seen that the issue was fully discussed and the governing body agreed unanimously that a complaint should be made. A copy of the minutes is at **Appendix 6**.
- 11.32 Mrs Smith confirmed that as Chair of Governors she made the immediate decision to ban the councillors from the site to safeguard all members of the school. She was also clear that at no time was the issue of CCTV discussed; at no time has she seen any CCTV pictures, nor had she requested that they be copied and 'lost'.
- 11.33 I asked Mrs Smith if she had any idea where Cllr Rayner might have gleaned his information. She said that she was not aware of who would have provided this 'information' and added that to her knowledge there were now only two governors still serving who were governors at the same time as Cllr Rayner. She said that Cllr Rayner had claimed contact with governors before and that when she made enquiries at a full meeting, they all denied having spoken to him.
- 11.34 She closed her message as follows:
- 'I hope this helps counter the allegations made by Cllr Rayner that I am lying about CCTV images. I have worked successfully in education for 52 years, have never made a complaint about a councillor before, indeed I have never experienced such outrageous behaviour from anyone in all that time'*.
- 11.35 As mentioned above, I also contacted Beverley Emmerson and Darren Lanes. My questions to them and their responses are set out below.

**(5) BEVERLEY EMMERSON**

- 11.36 I began by asking BE whether, when Mr Wright told her in his email of 11.41am on 4 March that he was unavailable that afternoon, she accepted that situation, albeit possibly with some reluctance. She said that she did accept the fact that he was not available for a meeting that day but had hoped that he would suggest an alternative date and time the following week.
- 11.37 I noted from the copy emails that Mr Wright's reply to BE's email was sent to her only, unlike hers to him which was copied to the three councillors and to others. I asked BE whether, on receipt of Mr Wright's email of 11.41am, she advised any of the people to whom her own email had been sent that he would not be able to make a meeting that afternoon and if so, who she had notified. She said that she informed all the Steering Group Members (except Mr Wright) by email at 11.53am of Mr Wright's response.
- 11.38 I asked whether, after receipt of Mr Wright's reply, she had any subsequent contact with any of the three Councillors that may have resulted in their attendance at Wrotham School in the hope of having a meeting with Mr Wright.

- 11.39 BE replied that at his request, she spoke face to face with Cllr Rayner about Mr Wright's response as he was attending a meeting at the Council offices that morning. Cllr Rayner then tried to contact one of the Governors of the school (Mr Reeve) but could only leave a message. It was at this point that Cllr Rayner said he would go to the school on his own to speak to Mr Wright about arranging a meeting the following week.
- 11.40 At 13.01, BE emailed the remaining members of the group to tell them of Mr Rayner's unsuccessful attempt to speak Mr Reeve (who had attended several Steering Group meetings) and that Cllr Rayner was on his way to the school to speak to Mr Wright with a view to arranging a meeting for the following week.
- 11.41 I asked BE whether she had asked or encouraged anyone to attempt to meet Mr Wright that afternoon. She said that at no time did she encourage any members of the Steering Group to approach the school or Mr Wright that afternoon.
- 11.42 Asked whether she was aware of their intention to do so, BE said that far as she was aware there was no intention for anyone else to go to the school that afternoon. Her hope was to attend a meeting with Mr Wright at 4.30pm but only if he was available, which he had already confirmed he was not.
- 11.43 Mr Wright sent BE a further email at 16.14 that day, advising that Cllrs Rayner and Taylor and 'one other' had arrived at the school and blocked his car in and that he had called the Police. I put two points to BE - firstly, whether she knew, before she received Mr Wright's email, that the three Councillors were in fact going / had gone to the school and secondly, whether she replied to that email.
- 11.44 She said that it was at about 3pm that afternoon, following a phone call from Cllr Betts, that she realised that the three councillors were at the school. She immediately notified her senior manager, Darren Lanes who then spoke to Cllr Betts on the phone. She did not respond to Mr Wright's email of 16.14 because by that time she had already left the office.
- 11.45 BE confirmed that she had no further contact with Mr. Wright on 4 March after the exchange of emails in the morning.
- 11.46 Finally, BE confirmed my understanding that the TMBC lawyers had advised that the use of the funds for the purchase of a new boiler did not constitute a breach of the Community Use Agreement.

**(6) DARREN LANES**

- 11.47 I explained to Mr. Lanes (DL) that I was having some difficulty in establishing why the three councillors apparently turned up at the school without a definite arrangement to meet Mr Wright. I told him that Cllr Rayner had told me that when he first arrived at the school, he sat in Cllr Betts' car while the latter had a 'speakerphone' conversation with DL about how to approach the issue and he added that he (DL) had 'counselled caution' about how they should conduct themselves in any meeting with Mr Wright, although he (DL) supported the meeting proceeding. I asked whether that was an accurate description of what happened, so far as he was able to recall.
- 11.48 DL said that he did advise Cllr Betts to proceed with caution as it was apparent from the phone call that the three councillors were determined to try to speak with Mr. Wright that afternoon. He said that at no point did he 'support' the meeting taking place. He was unaware that he was on speakerphone and his recollection is that Cllr Betts terminated the call when the other councillors arrived at the school.

- 11.49 I asked DL whether he was aware (perhaps having been told by Beverley Emmerson) that Mr Wright had said that he was unavailable that afternoon and if so, whether he had accepted that situation, albeit possibly with some reluctance.
- 11.50 He replied that he was aware that Mr Wright had said that he was unavailable to meet on the Friday and this was referenced in an email sent to him (and others) by Beverley Emmerson on the day in question. He added that he completely accepted that Mr Wright was unavailable.
- 11.51 I asked DL whether he had any contact (prior to his telephone conversation with Cllr Betts) with any of the three Councillors that afternoon which may have resulted in their attendance at Wrotham School in the hope of having a meeting with Mr Wright; whether he asked or encouraged any of them to attempt to meet Mr Wright that afternoon and whether he was aware of their intention to do so.
- 11.52 He replied that he had no other contact with either of the other councillors - only his phone conversation with Cllr Betts. He did try to call Cllr Rayner to discuss the issue and a potential meeting, although his phone rang off and there was no option to leave a message. He said that an email was also sent to them by BE, discouraging them from any action and advising that they contact DL. If he had contacted them, he would have tried to discourage them from attending the school although when contact was made, Cllr Betts was already on site. At no point did DL suggest or support a meeting that afternoon.
- 11.53 Finally, DL confirmed my understanding that the TMBC lawyers had advised that the use of the funds for the purchase of a new boiler did not constitute a breach of the Community Use Agreement.

## **12. WAS THE CODE OF CONDUCT ENGAGED?**

- 12.1 Both Wrotham Parish Council and Borough Green Parish Council adopted the NALC Code of Conduct prior to the date upon which the events the subject of Mrs Smith's complaint took place.
- 12.2 As members of Wrotham Parish Council and Borough Green Parish Council, Cllrs Rayner and Betts (WPC) and Taylor (BGPC) are (and at the material time were) bound by that Code.
- 12.3 I am satisfied that all three councillors were at all material times acting in their capacity as Parish Councillors and, these criteria having been met, I am satisfied that the Code of Conduct was engaged and that all three councillors were bound by it.

## **13. SCOPE OF THE INVESTIGATION**

- 13.1 At the risk of repetition but in the interests of clarity, I re-emphasise at this point that this investigation has been concerned solely with the alleged conduct of the three Councillors on the afternoon of Friday 4 March 2016 and, in relation to Cllr Rayner only, with the contents of the email sent by him at 12.59 on 9 March to Darren Lanes, Beverley Emmerson, Matthew Wright, Cllr Betts, Cllr Taylor, and Messrs Garland, Darby and Donovan.
- 13.2 The brief and terms of reference of this investigation do not cover any alleged breach of the Community Use Agreement arising out of the means by which the purchase of a new boiler for the changing rooms at Wrotham School was funded. I do however note for the record that all relevant officers of TMBC agree that there has been no breach as alleged.

## 14. CONSIDERATIONS AND FINDINGS – THE EVENTS OF 4 MARCH

- 14.1 In assessing whether there has been a breach of the Code, I have examined, on the basis of the best evidence available, how Cllrs Rayner, Betts and Taylor conducted themselves on the afternoon of Friday 4 March 2016 and I have tried to form a balanced view as to the probable sequence of events. This has not been particularly straightforward, given the conflicting accounts of what took place.
- 14.2 I have also looked at Cllr Rayner's email of 9 March and set out my conclusions in Section 15 below.
- 14.3 This is not of course a criminal investigation, to which the burden of proof of 'beyond all reasonable doubt' would apply. Rather, I have approached the matter on the basis of the civil burden of proof – i.e. the balance of probabilities – and I have given very careful consideration to the credibility, and demeanour and of all involved.
- 14.4 This the first investigation in my experience in which three councillors have had the same complaint made against them. I had anticipated interviewing each of them separately in order to give them an unfettered opportunity to respond to the allegations made against them but as recorded above, they, through the spokespersonship of Cllr Rayner, elected to be interviewed together.
- 14.5 Whilst I took no particular exception to this 'team' approach and do not consider that it proved a significant obstacle to the investigation, it did give rise to some inconsistencies of recollection and it meant that I was unable to probe individual versions of the events of 4 March. I felt that I was hearing a 'party line' rather than individual recollections and explanations that could be tested and compared one against another.
- 14.6 I turn now to the sequence of events of 4 March and describe how I believe, on the balance of probabilities, they unfolded. In coming to my conclusions, I have attached such weight and credence as I feel appropriate to all that I was told.
- 14.7 In his capacity as a member of the 3G Steering Group, Cllr Rayner arrived unannounced at Wrotham School at around lunchtime on Friday 4 March 2016, to see if he could speak to Mr Wright about what he (and others) saw as a potential misapplication of funds. He spoke initially to Sue Reeve the Receptionist who in turn called Rachel Martin who went off to find Mr. Wright who was on playground duty at the time. Mrs Martin returned with the message that Mr. Wright was unavailable then and that he would not be available that day.
- 14.8 I am quite satisfied that Mrs Martin *did* offer at that time to make alternative arrangements for Cllr Rayner to meet Mr. Wright. Cllr Rayner then left the school premises. So far, so good, and no indication of any untoward behaviour much less any breach of the Code of Conduct.
- 14.9 By this time of course, Mr. Wright had had his exchange of emails with Beverley Emmerson and was aware that a meeting to discuss the boiler issue had been requested. He had however told her that he would not be available that day and she passed this information on to all members of the Steering Group, albeit it is entirely possible that not all those to whom the email was sent read it either immediately or indeed within an hour or two afterwards.
- 14.10 Cllrs Rayner and Betts told me that they had not read this email before they went to the school later that afternoon. My notes do not disclose whether Cllr Taylor said whether he had read it, and I am happy for him to clarify this point should he wish to do so.

- 14.11 The most puzzling aspect of this case is why, given the complete lack of any indication that a meeting had been arranged, all three councillors took it upon themselves to arrive at the school unannounced that afternoon.
- 14.12 Given the close relationship that appears to exist between them, I find it surprising that Cllr Rayner did not (so it seems) advise Cllrs Betts and Taylor that he had been advised at lunchtime that Mr. Wright would not be available that day.
- 14.13 Their conduct is even more surprising given that according to Beverley Emmerson, Cllr Rayner had told her that morning that he would go to the school on his own to speak to Mr Wright about arranging a meeting the following week. He did of course go to the school on his own but apparently did not take up Mrs Martin's offer to arrange a meeting at a future date.
- 14.14 It appears that Cllr Betts was the first to arrive at the school that afternoon. He told me that his intention was to ascertain whether a meeting was in fact going to go ahead and if not, to ensure that a meeting was scheduled as soon as possible. Cllr Betts said that he texted Cllr Rayner to the effect that he (Cllr Betts) was already at the school.
- 14.15 For his part, Cllr Rayner, who, as recorded above, did not give a direct answer at our meeting as to why he went along that afternoon given what had happened at lunchtime, subsequently advised me that as Cllr Betts had sent him a text saying that he was at the school, he had no reason to doubt that a meeting had been agreed at the time he arrived there.
- 14.16 Whatever prompted the three councillors to turn up unannounced, the fact of the matter is that by their own admission, none of them had received confirmation that a meeting had been arranged. Moreover, Cllr Rayner knew full well that Mr. Wright would not be available for the remainder of the day and it appears that he either forgot or chose not to pass this information on to his colleagues.
- 14.17 Cllr Betts' explanation that they went to the school in order to ascertain whether the meeting was going to go ahead and if not, to try to make arrangements to meet on another day lacks all credibility and logic.
- 14.18 Keen though they might all quite legitimately have been to have a meeting, acting as they did flies in the face of conventional business courtesies and practice. There is no reason why confirmation as to whether a meeting had been or could be arranged could not have been secured by a simple telephone call to Mrs Martin.
- 14.19 I found it very significant that Cllr Taylor commented as follows:
- "It is also far more difficult to refuse a meeting if the people for that meeting are already there. It's easy to fend off a meeting in the future by email but if people are there for a meeting that's already been suggested, it's far more difficult. Matthew Wright is a member of our Committee and we are entitled to encompass him in a meeting. He was, now that the Business Manager had left, the school's representative and we simply wanted to see him, not in his capacity as Head Teacher but as the school's representative".*
- 14.20 The three councillors clearly did want to see Mr. Wright and they were quite within their rights to do so, but not on the terms and in the light of the attitude displayed by this comment that is, to my mind, clearly indicative of intimidation and bullying.

- 14.21 I turn now to what happened once the three councillors had entered the building. Here there are some discrepancies as to timings, the exact sequence of events and the words spoken but I am satisfied, on balance, that the essence of what happened is as follows.
- 14.22 Despite having been told earlier in the day by Mrs Martin that Mr. Wright would not be available, Cllr Rayner returned to the school with his two colleagues and asked again to see him. Once again, he was told by Mrs Martin that Mr. Wright was not available and I am satisfied that she *did* offer to make arrangements for them to meet him, not at a specific time but in principle and on a different day. Given her earlier conversation with Cllr Rayner and the nature of her job, it would be very odd if she had not made such an offer.
- 14.23 Whilst I am satisfied that the councillors were not rude or aggressive towards Mrs Martin, I am equally satisfied that they declined, refused or were unwilling to leave until they had seen Mr. Wright.
- 14.24 Having been advised by Mrs Martin (who may or may not have hurried into his office – it does not matter) that the councillors would not leave until they had seen him, Mr. Wright came out of his office, had a brief verbal exchange (it would, I think, be inaccurate to call it a conversation) during which he said, inter alia, that he had found Beverley Emmerson's email rude and that he was now leaving.
- 14.25 I am satisfied that one of the councillors (almost certainly Cllr Taylor) did say something along the lines of "Good luck with that" when Mr. Wright said that he was leaving.
- 14.26 Mr. Wright then made to walk to his car only to discover that it was blocked in by Cllr Taylor's van and, the import of Cllr Taylor's remark having registered, he walked back into the school.
- 14.27 Whilst I have been unable to draw a firm conclusion as to whether Cllr Taylor or either of the other councillors knew that it was Mr. Wright's car that had been blocked in, I am quite satisfied that when he went back into the building, he made it clear that Cllr Taylor's van was so positioned that he could not leave and that he asked him to move it.
- 14.28 Whilst Cllr Rayner may well not have initially been aware that there was a problem with Mr. Wright's car and may have thought that when he returned to the building, Mr. Wright had had a change of heart about meeting them, I am satisfied that there came a time very shortly afterwards when all three councillors were in no doubt about the reality of the situation and yet failed to do anything about it.
- 14.29 As noted above, Mr. Wright then decided to call the Police and Mr. Cater asked the three councillors to leave. I found Cllr Taylor's explanation as to why he did not move his van at this stage completely fallacious, particularly as Cllrs Rayner and Betts both moved their cars.
- 14.30 All three councillors were (or should have been) in no doubt by this stage that Mr. Wright was not able or willing to meet them there and then and that he had called the Police because they were preventing him leaving the premises.
- 14.31 A reasonable person would at that point have complied with his and Mr. Cater's requests, moved the offending vehicle, left the premises and allowed matters to proceed in a polite and dignified manner towards the arrangement of a meeting through the normal business channels and not by arriving unannounced, refusing to leave and preventing the person to whom they wanted to speak to go about his family business.
- 14.32 Cllr Taylor's comment at interview, set out in full at Paragraph 10.64 included what I regard as a particularly telling sentence: "*I was not going anywhere until we had exhausted the possibility of him talking to us...*"

- 14.33 Lest it be thought that I have simply accepted everything that the School personnel have said and disregarded all that the councillors have told me, I must emphasise that this is not the case. The sequence of events that unfolded that afternoon was described consistently and separately by four different individuals, none of whom could in my view have any possible motive for concocting the *'tissue of lies and fabrication'* that Cllr Rayner considers it to be.
- 14.34 I do not believe that Mrs Martin would have done other than offer to make alternative arrangements for a meeting nor that Mr. Wright would have resorted to such a drastic measure as calling the Police had he not considered that he had no alternative nor that he or any of the school staff sought to dramatise the situation.
- 14.35 I was unable to secure direct answers to some of my direct questions when interviewing the councillors and I noted that Cllr Betts seemed by both his responses to me and in his letter to Mrs Smith of 9 March – see Paragraph 10.71 - to be distancing himself from the attitude (or tactics if I may call it that) displayed by his two colleagues, both of whom appear to me to have been particularly and inappropriately determined. That said, Cllr Betts could, if he had felt matters were getting out of hand (as indeed they were) have backed off and encouraged them to do the same.
- 14.36 I believe that any reasonable person would find the councillors' conduct in arriving at the school unannounced, in the knowledge that no meeting arrangements had been confirmed and that Cllr Rayner had previously been told that Mr. Wright was unavailable for the remainder of the day, illogical and their approach once on the premises completely unacceptable. Mr. Wright, Mr. Cater and Mrs Reeve all commented to me that they found it hard to believe that the councillors were behaving more like children than adults.

## **15. FINDING – CLLR RAYNER'S EMAIL of 9 MARCH**

- 15.1 Having commented that I failed to secure direct answers to some of my questions when I interviewed the three councillors, Cllr Rayner was by contrast extremely direct when I asked him if he wished to comment on the element of Mrs Smith's complaint that related to his email of 9 March in which he criticised the Wrotham School Governors and Mr. Wright and accused them of collusion in the misappropriation of funds and Mr. Wright of having a slush fund. Cllr Rayner simply said that he stood by everything he wrote in the message and that the matter was still in the hands of his solicitors.
- 15.2 I note that, as recorded in Paragraph 10.17, Cllr Rayner told me that he had expressed a willingness to speak in support of Mrs Pankhurst at her Employment Tribunal hearing and yet in his email of 9 March (q.v.) he alleged that she had provided the 3G Pitch Committee with fraudulent accounts.
- 15.3 I can be as concise as Cllr Rayner. I consider that his accusations in an email that was distributed to a number of people to be a clear breach of the paragraph of the Code of Conduct that requires members to *'behave in such a way that a reasonable person would regard as respectful'*.

## **16. OTHER MATTERS – THE POLICE INVOLVEMENT AND THE NEWS STORY**

- 16.1 In the event, the Police did not go to the school in response to Mr. Wright's call and indeed he later stood them down. They did go to the school the following week and took statements but I did not think it necessary to secure copies, not least because they were taken for a different purpose and I wanted to ensure that in reaching my conclusions I placed reliance on what I had personally been told by those involved.

- 16.2 The Sevenoaks Chronicle story was headlined “Councillors are accused of holding head hostage”. The report gave the impression that the Police had been called to a ‘stand-off’ between the three councillors and Mr. Wright and went into some detail about the councillors’ concerns. The report also carried photographs that apparently sought to demonstrate that Mr. Wright’s allegation that his car had been blocked in was groundless.
- 16.3 I do not believe that the story was passed to the paper by anyone at the School but as its publication did not form any part of Mrs Smith’s complaint, I have not pursued it as part of my investigation.

## **17. COMMENTS ON THE DRAFT REPORT**

- 17.1 I submitted my draft report to Mrs Sheila Smith and to the three councillors by email on 6 September and asked for any comments within two weeks.
- 17.2 The only comment I received from Mrs Smith was a correction about the timing of the Police’s visit to the school following the incident on 4 March and I incorporated that amendment in the report.

- 17.3 Cllr Taylor replied by return as follows:

*‘I didn’t bother to read your report, just its conclusion, which came as no surprise whatsoever, despite the longwinded process, your conclusion could have been written months ago.*

*Were it not that I might receive yet another standards complaint I might suggest you are as independent as the Borough Solicitor, but then he is paying you.*

*As for respect, it is earned, not forced by edict, I have no respect for these people because of their behaviour, and even less respect now, and as you have failed to even pay lip service to a proper investigation, I have no respect for you either.*

*See you at the hearing.’*

- 17.4 Cllr Rayner replied on 15 September to the effect that he had been on holiday and, following consultation with Mr. Stanfield, I accordingly agreed to allow him until 14 October to respond.
- 17.5 Cllr Betts replied on 29 September to the effect that his father had had a serious accident and that he would not be able to respond within that time and on 12 October he sent me a further message to the effect that he hoped to be able to respond by the beginning of the following week – i.e. by Monday 17 October.
- 17.6 As at today’s date (Monday 17 October) I have received no further communication from Cllrs Rayner or Betts. Even allowing for holidays and family illnesses, I consider that both have had ample opportunity to respond and I have, with Mr. Stanfield’s agreement, decided to issue this version as my final report.

## **18. CONCLUSION**

- 18.1 I have concluded that there have been breaches of the Wrotham and Borough Green Parish Councils’ Codes of Conduct on the part of Cllrs Harry Rayner (WPC), Robin Betts (WPC) and Mike Taylor (BGPC) consisting of a failure by each of them to observe the Member Obligations (1) to behave in such a way that a reasonable person would regard as respectful and (2) not to act in a way which a reasonable person would regard as bullying or

intimidatory arising out of the manner in which each of them conducted themselves while on Wrotham School premises on the afternoon of Friday 4 March 2016.

- 18.2 I have further concluded that there has been a breach of the Wrotham Parish Council Code of Conduct on the part of Cllr Harry Rayner consisting of a failure by him to observe the Member Obligation to behave in such a way that a reasonable person would regard as respectful arising out of his circulation of the email dated 9 March referred to above.

#### **19. COMMENT RE CCTV SYSTEM**

- 19.1 I do not believe that the CCTV footage for the relevant period was deliberately lost overwritten or withheld and whilst I am not convinced that it would have been of any assistance in establishing who said what and to whom, it would have shown movements in and out of the Reception area and, possibly, body language and facial expressions. It would also have helped to clarify the timing of the events as they unfolded and it is unfortunate that overwrite is set to happen after such a short period of time.
- 19.2 I do not know whether the School has ever had to resort to viewing footage from the system, perhaps because of an altercation between pupils or for some other reason, but given that the incident on 4 March was obviously of some significance, I am rather surprised that the footage for that afternoon was not downloaded and retained.
- 19.3 I would recommend that the School review the operation and retention periods for the CCTV system

**Richard Lingard**  
**17 October 2016**

#### **APPENDICES**

1. Letter of Complaint
2. NALC Code of Conduct
3. Beverley Emmerson's exchange of emails with Mr. Wright on 4 March 2016
4. Article in the Sevenoaks Chronicle 10 March 2016
5. Cllr Rayner's email of 9 March 2016
6. Minutes of the Governors Meeting on 10 March 2016