

Kent County Council

Code of Conduct Complaint Form

Your Details

1. Please provide us with your name and contact details.

2. Please tell us which complainant type best describes you:

3. Please provide us with the name of the councillor(s) you believe has breached the Code of Conduct and the name of their authority:

Councillor Paul Webb, Cabinet Member for Community and Regulatory Services, Sittingbourne
South, Swale

Councillor Linden kemkaran, Leader of Kent County Council, Maidstone South East,
Maidstone

4. Please explain in this section what the councillor has done that you believe breaches the Code of Conduct. If you are complaining about more than one councillor you should clearly explain what each individual person has done that you believe breaches the Code of Conduct.

It is important that you provide all the information you wish to have taken into account by the Monitoring Officer when they (acting in consultation with the Independent Person and the Chairman of the Standards Committee) decide whether to take any action on your complaint. For example:

- You should be specific, wherever possible, about exactly what you are alleging the councillor said or did. For instance, instead of writing that the councillor has conducted himself in a manner which could reasonably be regarded as bringing his office or the Authority into disrepute you should state what it was they said or did.
- You should provide the dates of the alleged incidents wherever possible. If you cannot provide exact dates, it is important to give a general timeframe.
- You should confirm whether there are any witnesses to the alleged conduct and provide their names and contact details if possible.
- You should provide any relevant background information.

Please provide us with the details of your complaint. Continue on a separate sheet if there is not enough space on this form.

You may wish to handle these two complaints separately, or space them out. You may also wish to make separate complaints regarding the book ban, and regarding the other post about staff training.

Below is a summary of what you might want to include as the factual context of the complaint.

Councillor Paul Webb

On 2 July 2025, Cllr Webb posted a video via his verified X media account @CouncillorWebb, publicly stating that *"I was recently contacted by a concerned member of the public who found trans ideological material and books in the children's section of one of our libraries. I've looked into this and this was the case. I have today issued an instruction for them all to be removed from the children's section of any of our libraries. They do not belong in the children's section of our libraries. Our children do not need to be told they were born in the wrong bodies. So from today, this will stop."*

<https://x.com/councillorwebb/status/1940460981303628167?s=46>

On the 4 July 2025, in a BBC article Webb said: *"In our society, children are quite rightly and properly protected from items and actions that could cause them harm – for example alcohol, cigarettes and gambling."*

"My fellow Reform members and I believe that our young people should be protected from exposure to potentially harmful ideologies and beliefs such as those held by the trans lobbyists."

When the BBC asked if Reform UK had carried out an assessment to understand the impact of removing the books, Webb said: *"As far as impact assessments are concerned, I would have thought that question should have been asked before these books were placed in the children's section to begin with."*

<https://www.bbc.co.uk/news/articles/c6257p2vry3o>

Cllr Linden Kemkaran

This complaint extends to the statements that Cllr Linden Kemkaran made on her social media, including her official X account @leaderofKCC and her Facebook page Linden Kemkaran KCC. The statements have spread discriminatory and inaccurate legal assertions, harassed a protected group of people, and constituted a misuse of her position to imply non-existent policy changes, all of which place her in breach of this code.

On X, on 2 July 2025, she tweeted two photos, displaying the book *The Autistic Trans Guide to Life*, and commented *"Another victory for #commonsenseinkent my brilliant cabinet member Cllr Paul Webb has just got this trans material REMOVED from the children's section of all kent's libraries. Telling children they're in the 'wrong body' is wrong and simply unacceptable."*

<https://x.com/leaderofkcc/status/1940446162785603671?s=46>

On the same day, she also retweeted his video, and added *“Courage & common sense in #kent from my brilliant colleague who’s acted decisively & REMOVED all trans-related books from our libraries children’s sections with immediate effect.”*

<https://x.com/leaderofkcc/status/1940472491098755510?s=46>

Additionally, on 27 June 2025, she posted the article “The Council Ignoring the Supreme Court” from jamesesses.co.uk, and commented *“We have some very brave people working in KCC. Thanks to this whistleblower I’ve been able to get this dreadful material taken off the staff e-learning platform with immediate effect.*

“Most sensible people out there didn’t need a Supreme Court ruling to tell us what a woman was in the first place, but this daft ideological nonsense clearly contravenes its recent ruling on sex being defined in law as being a biological fact, and not a ‘feeling’ in someone’s head.

“Whoever you are, thank you for speaking out and for drawing this to my attention. More and more people are coming forward anonymously to tell me what’s really going on and I applaud you all.

“Reform is on the side of common sense.”

<https://www.facebook.com/share/15xDsxoTJ6/?mibextid=wwXlfr>

This article is now behind a paywall, but when it was originally published it was not.

The article starts: *“A few weeks ago, I was contacted by a whistleblower who works for the Council. I was told:*

‘As an employee of Kent County Council, I find the torrent of LGBTQ+ material forced upon us during pride month incredibly alienating. Gender ideology is a highly controversial but also highly contested topic, of which many of my colleagues and I do not subscribe to. The guidance presented to us is not only factually inaccurate, subjective, but also contravenes several updated legal positions such as the Supreme Court judgment, the Cass Review and Forstater ruling. It appears that local government have forgotten that there are nine protected characteristics and is clear that any freedom of speech and freedom of thought is not to be tolerated.’

“My whistleblower leaked a multitude of internal training documents and policies that, crucially, are still in force as of today’s date, in complete and utter disregard of the Supreme Court judgment.”

It then goes on to criticise trans-awareness staff training, make assertions about the law which are inaccurate, and refer to both trans awareness and efforts to be an anti-racist organisation as “*ideologies*” and “*madness*”.

The full article, as it was originally published, can be accessed here:

<https://web.archive.org/web/20250703154844/https://www.jamesesses.co.uk/p/the-council-ignoring-the-supreme>

You may want to add this, but it is likely not necessary:

Under Clause 21.53, “You must comply with this code whenever you act in your official capacity as a Member or Co-opted Member of the Authority.”

Clause 21.54 states that “This code applies to all forms of communication and interaction, including social media, which could result in a relevant breach of the code.”

Please refer to the Kent Code of Conduct for Members when writing this complaint:

https://www.kent.gov.uk/_data/assets/pdf_file/0006/192804/Kent-code-of-conduct-for-members.pdf

Below are the suggested clauses you might reference, and some pointers as to their relevance. But please write it in your own words - and consider the points that you think are relevant.

- 1. 21.56 You must not: (a) carry out any act of harassment or bully any person.**

Paul Webb:

- Bullying/harassment includes offensive, intimidating, or abusive behaviour and misuse of power. Legal definitions (Equality Act 2010 & Protection from Harassment Act 1997) reinforce protections against conduct that creates hostile or coercive environments. Cllr Webb’s statements meet the definition of harassment under both the Code and relevant legislation.
- His comments created a hostile environment for transgender people and library staff.
- By calling trans identities “ideological” and “harmful,” he publicly denigrated a

protected group.

- His rhetoric echoes Section 28-era discrimination, with harmful social consequences.
- Staff faced risk of public backlash and disciplinary pressure; trans people received a message of exclusion.
- Framing trans individuals as a safeguarding risk promotes societal exclusion and legitimises prejudice.
- These actions contribute to wider censorship efforts and intimidation of public services.
- Libraries' role as inclusive spaces is undermined, silencing marginalised voices.
- Loss of affirming literature harms young trans people's mental health and wellbeing.
- Failure to conduct an Equality Impact Assessment may breach the council's legal equality duties.

Linden Kemkaran

- Reposted and endorsed Cllr Webb's statements, repeating the same harassment breaches.
- Violated clause 21.56(a) by engaging in offensive, intimidating or malicious behaviour and misusing her position to humiliate a protected group.
- Publicly celebrated the removal of trans-related books from children's sections, effectively endorsing potentially unlawful censorship.
- Used official social media to single out and denigrate trans people, a protected characteristic.
- Described trans awareness training as "dreadful" and "daft ideological nonsense," reducing trans identities to a mere "feeling in someone's head."
- Amplified an article equating inclusion and anti-racism initiatives to "ideological... madness" and misrepresenting Equality Act protections as coerced dogma.
- Abused her public office to legitimise discriminatory biases, intensifying a climate of intimidation and exclusion.
- Removed trans awareness training from the staff e-learning platform, depriving employees of guidance necessary to prevent prejudice-fuelled conduct.
- Failed to conduct an Equality Impact Assessment, consultation, or oversight, undermining the council's Public Sector Equality Duty.
- Misused cabinet authority to create a more hostile workplace, deterring both trans employees and allies from speaking up or seeking support.
- Overall, her actions constitute broader harassment toward a protected minority and an abuse of power under the Kent Code of Conduct.

2. **21.56 You must not: (b)** intimidate or attempt to intimidate any person who is or is likely to be a complainant, a witness, or involved in the administration of any investigation or

proceedings, in relation to an allegation that a Member (including yourself) has failed to comply with this Code;

Linden Kemkaran

- Clause 21.56(b) prohibits intimidating or attempting to intimidate any complainant, witness, or person involved in investigating a member's alleged Code breach.
- Cllr Kemkaran publicly lauds anonymous insiders who leak trans-inclusive materials, framing their disclosures as "common sense" heroism.
- She explicitly invites "more and more people" to bypass formal complaint routes and share materials through her informal social channels.
- Her praise is limited to those who support her stance, implicitly warning neutral or dissenting staff that they risk censure or ostracism for following official policy.
- Anyone considering reporting her conduct or acting as a witness faces potential public exposure on her official accounts, labelled as ideological trouble-makers rather than legitimate complainants.
- This misuse of her position fosters a hostile environment where staff feel unable to raise concerns or seek support, amounting to intimidation of potential complainants in direct breach of Clause 21.56(b).

3. **21.56 You must not: (c)** do anything that compromises, or is likely to compromise, the impartiality or integrity of those who work for, or on behalf of, the Authority;

Paul Webb

- Cllr Webb's social media directive to remove transgender-themed books bypassed formal procedural fairness while implying a binding policy by legitimate expectation.
- He imposed a political order on library professionals whose role is to curate free, unbiased information.
- By treating librarians as agents of an unofficial policy, he forced them to choose between his public edict and their duty under the Charter of Public Library Services in England.
- This undue pressure fosters self-censorship, prompting staff to preemptively restrict materials to avoid conflict.
- The outcome undermines librarians' professional integrity and erodes public trust in Kent libraries as impartial services.
- Such interference breaches Clause 21.56(c), which prohibits actions that compromise the impartiality or integrity of authority staff.

Linden Kemkaran

- Clause 21.56(c) states that a member must not “do anything that compromises, or is likely to compromise, the impartiality or integrity of those who work for, or on behalf of, the authority”.
- Where she has publicly endorsed and celebrated the actions of Cllr Paul Webb, the complaints surrounding his conduct and his breach of this clause thus extends to her.
- Furthermore, by publicly condoning and celebrating alleged whistleblowers who criticise inclusion training using discriminatory rhetoric, and using that as a justification to dismantle approved trans-awareness training, Cllr Kemkaran implies that impartial delivery of equality and diversity guidance is unacceptable unless it aligns with her personal views.
- By further signalling that those who simply carry out their professional duties risk public shaming for engaging in “daft nonsense”, she effectively undermines the neutrality in which civil servants must operate.
- Impartiality demands that offices can give evidence-based advice, deliver agreed policy, and support all protected groups without fear of political fallout. When the leader publicly rewards leaks that align with her ideology, she forces staff into a corner, where either they side with her personal biases or face reputational damage.
- Integrity hinges on staff being free to uphold professional standards, even when those standards clash with political preferences. By celebrating whistleblowers who breach confidentiality and denouncing established and lawful guidance as “dreadful” dogma, Cllr Kemkaran signals that honesty and adherence to council policy are liabilities, not virtues.
- In this hostile environment that she has created, staff may self-censor, dilute their advice, or manipulate facts to align with her views in order to protect themselves. This undermines the moral uprightness and reliability that the public expects from its local authority.

4. 21.56 You must not: (d) disclose information given to you in confidence by anyone, or information acquired by you which you believe, or ought reasonably to be aware, is of a confidential nature

Linden Kemkaran

- Shared leaked internal trans-awareness staff training materials from the council’s e-learning platform on her official X and Facebook accounts.
- Posted excerpts and screenshots of training modules meant for confidential staff use only - including identifying information about KCC Staff who were part of the Rainbow Network.

- Praised anonymous insiders for leaking these internal training documents and encouraged more disclosures through informal channels.

5. 21.56 You must not: (e) prevent another person from gaining access to information to which that person is entitled by law

Paul Webb

- Cllr Webb's order to remove or relocate transgender-themed books from children's sections blocks young readers from materials they're entitled to under law.
- The Public Libraries and Museums Act 1964 mandates a comprehensive and efficient library service, which includes providing access to a diverse range of works.
- Removing those books breaches this statutory duty to offer varied content.
- It also violates Article 10 of the Human Rights Act 1998 by restricting freedom of expression and the right to receive information.

Linden Kemkaran

- The same criticisms of Cllr Webb apply to Cllr Kemkaran due to her public endorsement and celebration of his actions.
- She ordered the removal of trans-awareness e-learning modules from the staff platform, barring employees from accessing essential guidance.
- The Equality Act 2010 obliges local authorities to eliminate discrimination and advance equality through workforce training.
- Staff have a legitimate expectation to receive and rely on this statutory training.
- Withdrawing the modules denies employees access to information they are legally entitled to under the Equality Act.

6. 21.56 You must not: (f) conduct yourself in a manner which could reasonably be regarded as bringing your office or the Authority into disrepute

Paul Webb

- Cllr Webb likened transgender-themed books to harmful substances like alcohol and gambling and ordered their removal without any formal policy.
- His remarks have generated widespread criticism and created the impression that Kent County Council supports censorship and discrimination.

- This conduct risks bringing his office and the authority into disrepute under Clause 21.56(f) by undermining KCC's reputation as a fair, impartial public body.
- Using his official platform, he spread inaccurate, ideologically driven messages that conflict with established library and equality standards.
- The lack of an Equality Impact Assessment and disregard for the Public Sector Equality Duty expose KCC to potential judicial review for procedural unfairness and discrimination
- His actions also infringe Article 10 of the Human Rights Act 1998 by effectively censoring lawful information.
- Even without a formal policy, there is a legitimate expectation that his public statements carry binding force, giving an implied ban legal weight.
- These combined failures—code breaches, PSED neglect, HRA violations, and the doctrine of legitimate expectation—make KCC vulnerable to court scrutiny and sanctions.

Linden Kemkaran

- Clause 21.56(f) bars members from acting in ways that could bring their office or the Authority into disrepute.
- Cllr Kemkaran's public support for Cllr Webb's misleading, discriminatory statements similarly breaches this provision.
- Using her official channels to denigrate trans people, endorse removal of inclusive materials, and amplify biased commentary casts the council as hostile, intolerant, and legally negligent.
- Such inflammatory conduct undermines confidence in KCC's commitment to fairness, damaging its reputation with staff and the wider community.
- Prioritising political bias over statutory duties signals that the Authority values ideology above its Public Sector Equality Duty.
- Describing essential equality training and library resources as "dreadful" or "daft ideological nonsense" misrepresents council policy and aligns KCC with an exclusionary campaign.
- This misalignment between rhetoric and legal obligations erodes public trust and invites legal challenge under equality and judicial review mechanisms.
- By undermining the council's equality work—labelled "ideological madness"—she attacks both policy and the officers who develop it, further discrediting the Authority.
- Overall, her conduct risks costly litigation, judicial scrutiny, forced reversals, and lasting damage to KCC's standing as a fair, impartial public body.

Name:

Signature:

Date:

Return Address: Monitoring Officer Kent County

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