Food Service Plan 2026-2029

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1. Introduction

This Service Plan sets out how the Council intends to provide an effective food safety service that meets the requirements of the Food Standards Agency (FSA) Framework Agreement. It covers the functions carried out by authorised officers of the Food & Safety Team under the provisions of the Food Safety Act 1990 and associated Regulations. Duties are statutory unless otherwise stated.

The 2026-29 service plan will be under regular review and will continue to be developed to include improving the use of social media and the internet to maintain an up-to-date database, and to gather local intelligence. An internal auditing regime continues to be implemented in order to ensure consistency and maintain standards of service delivery and accuracy.

1.2 Current and Future Challenges

The borough of Gravesham has close transport links to London and has seen the population increase in recent years and it continues to rise resulting in the number of food businesses increasing to meet demand. This includes an increase in the number of food businesses selling imported foods from Third Countries outside of the European Union. The number of new food businesses opening has continued to exceed the number of those closing, leading to exponential growth in the sector. As the number of food businesses increases this increases the workload of the Food & Safety Team, new food business registrations require additional work for Food Officers as well as additional administration work. Once businesses are registered, they are added to the inspection programme increasing the number of inspections required overall. Many new businesses are being opened by individuals with no experience of running a food business, this often leads to poor compliance, despite advice and guidance being provided at registration, this then increases the number of visits required by officers. The Food Standards Agency recognises these challenges and has made changes to its most recent food law code of practice update to lighten the burden on local authorities. The changes remove the requirement for businesses risk assessed as lower risk to be inspected within 28 days. This does not however remove the requirement to inspect them and may only result in longer waits for initial inspections to take place.

The food industry is changing and developing nationally. An increase in the number of dark kitchens (those which do not have a customer facing element) has been seen nationally and within the Gravesham Borough. Due to economic pressures being felt by many businesses, we are seeing new business models that do not fit the traditional ways of working. There has been an increase in domestic houses being used to run food businesses and commercial properties being used for multiple food businesses where kitchens are being shared to share the costs. Innovative use of space in these ways are increasingly hard to regulate and presents administrative challenges for the Food Authority in terms of organisation and enforcement.

Legislation has been introduced in several areas of food safety within recent years that has increased the amount of work for Food Authorities. The biggest changes have been around food information regulation, in particular allergen information and the management of allergens in food preparation. This has added new compliance areas to food inspections, increasing their duration, and officers are required to have knowledge and formal qualifications to carry out related enforcement activities.

It is recognised nationally that there is a shortage of qualified and competent food safety officers. This is due to the number of Environmental Health Officers leaving the profession or retiring and the lack of training opportunities for new students coming into the profession. The new Food Control Qualification, the baseline legal requirement for food safety officers, is only currently being taught at 2 educational institutions in England. This has increased the pressure on local authority food teams who have had officers leave or retire as replacing these officers is extremely difficult. In many local

authorities, temporary contractors must be employed to cover the shortfall and ensure the food inspection programme is maintained. Long term this is not a sustainable solution, contractors are often expensive and work remotely, often they are employed by more than one local authority at a time. Gravesham Council has taken on a number of Environmental Health apprentices to address this issue.

The Food & Safety Team is currently fully resourced. Two officers will be eligible to retire within the next 5 years, so it is vital that plans are in place to ensure that the team continues to be resourced. A trained apprentice may be able to train with the team to gain competence and experience which could provide a succession plan and prevent the service from underperforming in future due to lack of resource.

1.3 Local Government Reorganisation

In February 2025 the Minister of State for Local Government and English Devolution, wrote to all councils in two-tier areas and small neighbouring unitary authorities to formally invite proposals for local government reorganisation (LGR). The English Devolution and Community Empowerment Bill (2025) aims to simplify the process to undertake reorganisation.

Areas submitted interim plans by 21 March 2025, and full proposals followed later in the year at the end of November 2025. The Government will follow the established assessment and decision-making process, with a view to undertake elections in May 2027 ahead of the establishment of new local authorities in April 2028.

Gravesham Borough Council has submitted its proposal for re-organisation however a decision has not yet been made in relation to how the County will be divided and which Councils will merge into Unitary Authorities. It is highly likely however that Gravesham will combine with both Dartford and Medway Authorities. This Service Plan sets out how the resourcing of the Food & Safety Team has been calculated to ensure that it can meet the demand of the Food Inspection Programme in Gravesham whilst also covering other areas of statutory Environmental Health work. Both Dartford and Medway have also identified the resourcing requirements for their services based on the demand of the Food Inspection Programme within their areas.

It is important to note that although the Councils will merge, the number of food premises and the Food Inspection Programme required by the Food Law Code of Practice will not change. Therefore, numbers of Food Safety Officers must be maintained at the FTE set out in the Service Plan in order to ensure that the intervention frequencies are adhered to and food premises inspections are completed on time.

1.4 Auditing and Consistency

Data accuracy checks are carried out to ensure that documentation matches up to the system - Food hygiene inspection paperwork completed by officers is audited at a rate of 10% for accuracy and consistency, any changed risk rating premises are fully checked including the report and the checklist and that is checked against the letter to ensure it is accurate.

Any discrepancies found are discussed with the individual officer and general feedback given at the next team meeting. Peer review in team meetings, discuss cases, officer visits – checked discuss at 1:1 meeting.

The Food & Safety Team continues to take part in all Food Standards Agency national consistency exercises to inform and educate officers in their approach to the Food Hygiene Ratings Scheme.

Inspection input data is also audited to ensure that risk rating data is correct and that the FHRS consistency and framework agreement is being adhered to and the scheme safeguards being met.

1.5 Food Officer Qualifications

The Food Standards Agency consultation on the qualification and competency framework for food safety officers has been completed, and a new Food Law Code of Practice was published in October 2025. The Code sets out the baseline and alternative qualifications for Lead Officer and Authorised Officers. Gravesham Borough Council will meet the requirements of the code when authorising officers for food safety and hygiene enforcement duties. We will also continue to support newly qualified officers in gaining experience and competence where possible to encourage new officers into the profession and safeguard resources.

2. Service Aims, Objectives and Priorities

2.1 Aims, Objectives and Priorities

2.1.1 Aims

- The overall aim of the Food Safety Service is to ensure that food intended for human consumption produced, stored, distributed, handled or purchased within Gravesham is without risk to public health and safety of the consumer.
- To encourage good practice amongst those responsible for preparing, handling and cooking food intended for human consumption, and to ensure they comply with their statutory obligations.
- To rate all relevant premises under the Food Hygiene Rating Scheme (FHRS) enabling Gravesham consumers to make informed decisions about where they consume food.

2.1.2 Objectives

- To fulfil the statutory duty imposed on the Council under the Food Safety Act 1990 as 'The Food Authority' and ensure the effective implementation of Government Strategy on food safety issues, having regard to the most recent Food Law Code of Practice Issued by the Food Standards Agency and other practice guidance issued by government organisations.

- Protect the public as far as reasonably practicable by delivering a complimentary programme of education and enforcement which endeavours to ensure that food businesses are conversant with the law, understand the principles of hygiene and are operated and maintained at a standard that complies with relevant legislation.

- To satisfy statutory requirements and have effective documented and procedural systems to enable accurate returns to the Government, ensuring these are reviewed and updated with key legislative changes.

- To take formal enforcement action using an educative approach where appropriate but closing premises through either voluntary means or Magistrates' Court where a health risk condition with imminent risk is found.

- To achieve the above objectives, the following priorities for the two-year period 2026-2028 have been identified. The Food Service plan will be reviewed annually or more frequently if appropriate.

2.1.3 Priorities

Gravesham Borough Council priorities, response work and service improvements are detailed below. The overall priority is to ensure the that the Council meets its statutory obligations as set out in the Food Law Code of Practice and relevant UK Food Law. The consequences of not satisfying statutory obligations can lead to Central Government putting in 'measures' to manage the 'The Food Authority', to enable statutory functions to be carried out and recharging the local authority the costs.

2.1.4 Corporate and Business Planning

Gravesham Borough Council has produced a Corporate Plan for 2023-2027. In seeking to deliver against our ambition, we have established a suite of corporate objectives.

Each objective has its own portfolio of activities and initiatives but, importantly, have been designed to work with and support the other objectives for the benefit of our local community.

- **#oneborough**: *a safe, clean, and attractive living environment, enhanced by a sustainable and increasingly energised local economy.*
- **#onecommunity***: an active, engaged, and culturally enriched population, built on the foundations of an affordable and quality local housing offer.*
- **#onecouncil**: *a well-run and innovative authority, defined by its skilled and valued workforce, committed to developing its local social impact.*

The Food & Safety Team is required to produce a Business Plan annually which sets out how the service will meet the Key Performance Indicators that are identified within the Corporate Plan.

2.2 Planned Work

Work will be planned throughout the year in order to meet both the regulatory objectives and the performance indicators set out within the Business Plan. Work is divided into different types and is prioritised as such.

2.2.1 Programmed Work

- Effectively deliver a comprehensive risk assessed inspection programme for all food premises.
- All food premises are considered as "approved premises" on routine inspections and an effective recording and monitoring system is put in place, both documentary and on the council's computer system for any premises that need approval.
- Develop and implement an alternative intervention programme including education, questionnaires and use of intelligence for some lower risk premises (Rated E).
- Carry out food hygiene rating re-rating inspections when requested by food business operators who have scored less than 5 at routine inspection.
- Carry out enforcement re-visits and follow up visits to premises that have historical and/or ongoing compliance issues found during an intervention.

- Regularly review and update the Food Safety Procedure Manual. Develop and provide officers with guidelines/checklists to enable them to make consistent decisions in the field in line with current Government advice.

- Deliver a food sampling programme in accordance with County or National-wide programmes and local sampling priorities.

- Monitor local businesses for the sale of legal and illegal third country imported foods and ensure that the correct documentation is in place for imported foods in accordance with the Food Law Code of Practice and official control regulations.

- Implement and practice an effective audit regime of the inspections/revisits/complaint work carried out by the food team to ensure consistency, accuracy and efficiency.

- Routine uploads (at least every 14 days) to the FHRS website for accuracy of published scoring and other information shown online compared to current data held.

- Routinely monitor the IDOX/Uniform database entries for local food businesses for accuracy and regularly carry out checks to cross-reference information against outside sources/internal databases.

- Implement the Food Hygiene Rating Scheme as accurately and consistently as possible and use the Food Standards Agency Brand Standard when carrying out food hygiene inspections whilst ensuring the risk rating meets the requirements of the Code.

2.2.2 Response Work

- Provide an effective response service able to deal proportionately with complaints regarding food hygiene.

- Provide an effective service for new business enquiries, to include providing new businesses with written advice and guidance to help achieve compliance and drive-up standards in the borough.

- Provide an effective response service able to deal proportionately with incidents or outbreaks of food poisoning or other notifiable diseases to include partnership work with UKHSA Health Protection Teams where required.

- Ensure all new and emerging food businesses are registered and are assessed and receive a full initial inspection within the timescales set by the Food Law Code of Practice.

- Respond within appropriate timescales to Rapid Alert System for Food and Feed (RASFF) Notifications, FSA food alerts and withdrawals.

- Provide other advice and information to both the public and businesses within the resources available.

2.2.3 Service Improvements

- Expand on officer training as appropriate to ensure a consistent approach to food related enforcement within the borough, to include Food Standards qualifications in preparation for Local Government Reorganisation.

- Carrying out regular training, peer review and consistency exercises with all food team members as required by the Food Standards Agency.

- Utilise the IDOX database to streamline the food service and inspection programme, ensuring that data is accurate, up to date and complete at all times.

- Seek to ensure the safe and effective sharing of information within the Council and with external agencies, according to the Data Protection Act 2018 and General Data Protection Regulations 2018.

- Expand the intelligence-based checking of food businesses visiting from outside the local authority area and show a presence at small- and large-scale public events. Share information and intelligence with other local authorities.

- Continue regular accountability meetings with the Regulatory Services Manager to improve performance and management of food team activities.

- Ensure that out of hours inspections are up to date and carried out at a frequency as required by the Food Law Code of Practice.

- To consider areas of work where fees and charges can be applied to provide a more tailored service to food businesses that require additional support in the borough.

2.2.4 Service Reviews

- To carry out a business plan review each year to measure performance against indicators, report on performance to management and adjust the service plan where necessary.

- Review, update and then maintain officer training programmes, internal e-Learning courses to assist with the competency of Food Enforcement Officers who must achieve a minimum CPD of 20 Hours per annum, 30 hours for senior EHPs.

- Review the procedure manual as required and in full every 5 years to ensure that all references to documentation, practice guidance and other material is up to date and accurate.

- Carry out regular 1:1 meetings as well as team meetings between Senior Officers and Food & Safety Officers to ensure consistency.

- Review the procedures in relation to the principles of Regulatory Delivery and Primary Authority as set out in the Regulatory Enforcement and Sanctions Act 2008 to ensure that requirements are being met.

3. Organisation

3.1 Profile of Gravesham

Gravesham Borough is located in the north of Kent and comprises a mixture of rural and urban communities with a population of approximately 107,700. It is approximately 32 kilometres (20 miles) east of London and covers a land area of 99 square kilometres (38 square miles), stretching from the River Thames in the north to the crest of the North Downs in the south.

Gravesham is bounded by the local authorities of Dartford and Sevenoaks to the west, Tonbridge and Malling to the south and Medway to the east. Home to an attractive natural environment, including the Kent Downs AONB, it has strong transport connectivity to central London.

Gravesham has significant health inequalities, with a clear north-south divide relating to child and adult health across; life expectancy, physical activity, and personal wellbeing outcomes, including wider health determinants such as crime levels.

Alongside international migration, in recent years the borough has experienced a large inflow of new residents from outer London and Dartford, and a pattern of outward migration by existing residents, potentially a result of housing affordability and employment options. Over 40% of households live in relative poverty, with deprivation largely concentrated in the northern parts of Gravesham. These areas have higher than average numbers of imported food businesses as well as fast food takeaways.

Gravesham is home to around 4,500 businesses however in terms of sustainability, Gravesham's businesses have lower rates of survival across the short, medium, and long term, this presents challenges for food businesses that open and close and change hands frequently meaning more frequent inspections are required. As of 2026 around 850 food businesses are registered and inspected under the Food Hygiene Ratings Scheme in Gravesham with approximately 900 food premises registered with the authority in total.

3.2 Organisational Structure

The Council operates on a Leader and Cabinet system with lead members delivering specific portfolios as follows:

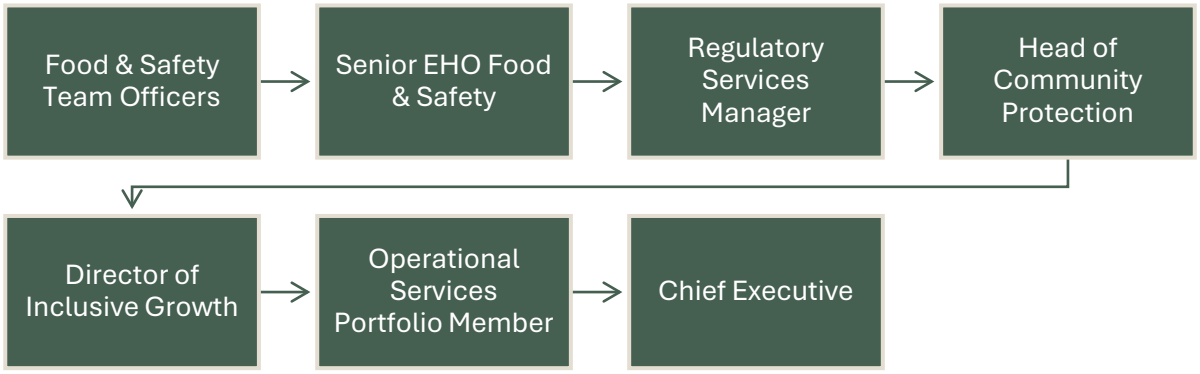
Cllr. John Burden is Leader of the Council.
Cllr. Shane Mochrie-Cox is Deputy Leader.

Cabinet Positions for 2025 are as follows;

Portfolio	**Cabinet Member**
Cabinet Member for Planning & Business Development	Cllr S Mochrie-Cox
Cabinet Member for Performance & Administration	Cllr R Atwal
Cabinet Member for Community & Leisure	Cllr D Croxton
Cabinet Member for Operational Services	Cllr E Morley
Cabinet Member for Housing Services	Cllr K O'Malley

The Food functions are considered to be part of the Operational Services Portfolio and Cllr. Emma Morley is the relevant portfolio member.

The key reporting lines for the flow of food safety/health and safety issues are:



Specialist Appointments

The food team are supported in delivery of their functions by the following specific appointments:

Department	Appointment	Contact Details
UK Health Security Agency	**CCDC**, Directors of UKHSA	UKHSA Surrey and Sussex Health Protection Team (Southeast) SE.AcuteResponse@ukhsa.gov.uk Phone: 0344 225 3861 Out of hours: 0844 967 0069
Kent Scientific Services	**Public Analyst** Specialist Samples Port Health samples	Kent Scientific Services 8 Abbey Wood Road Kings Hill West Malling Kent
UKHSA FWEM Laboratory	**Food Examiner** Formal Samples	FW&E Microbiology Lab (Collindale) London, 61 Collindale Avenue London NW9 5 EQ
Kent County Council	**Food Standards Enforcement**	Kent Trading Standards (Food) County Hall Maidstone Kent ME14 1XQ

3.3 Scope of the Food Law Service Plan

The Food & Safety Team are responsible for the following statutory duties:

- Implementing the proactive programme for food hygiene interventions and subsequent revisits for food premises.
- Investigating the possibility of premises requiring ‘Approval’ at the time of inspection.

- Investigating reported cases of food poisoning and potential outbreaks in accordance with UK Health Security Agency (UKHSA) guidance and framework agreement.
- Investigating requests for service (complaints) regarding the hygiene of food premises, or food safety issues relating to foods purchased or produced in Gravesham.
- Registration of new food premises.
- Responding to food alerts and requests for action from the FSA.
- Delivering a food sampling programme in line with national, regional and local programme and priorities.
- Development and maintenance of partnerships and liaisons to the furtherance of the Food Service.
- Providing the Food Standards Agency with statistical returns.
- Carrying out enforcement of inland imported food/controls.

And non-statutory duties:

- Provision of training, advice and support, including a consultancy service, to existing and prospective food business operators and the users of the service.
- Implementing projects and campaigns within available resources that promote good food hygiene.

3.4 Demands on the Food Service

As at April 2026 there are 898 Food Premises in Gravesham Borough Council area. The following tables provide more detail regarding premises types and risks (all data is subject to fluctuation):

3.4.1 Establishment Numbers by Groups

Description (MAFF Code)	**No. of Premises**
Producers (A)	1
Manufacturers/Processors (C)	8
Importers/Exporters (E)	2
Distributors/Transporters (F)	12
Supermarket/Hypermarket (G01)	20
Smaller Retailers (G02)	156
Retailers Others (G03)	45
Restaurant/Canteen (H01)	146
Hotel/Guest House (H02)	7
Pub/Club (H03)	85
Take-away (H04)	94
Caring Establishment (HO5)	83
School/College (H06)	73
Mobile Food Unit (H07)	43

Restaurant Caterer/Others (H08)	123
TOTAL	898

3.4.2 Establishment numbers by risk groups (2025)

Risk Rating	No. of Premises
A	2
B	4
C	57
D	408
E	398
Unrated	29
TOTAL	898

3.4.3 Inspection frequency

In accordance with the Food Law Code of Practice the food hygiene intervention frequencies are as set out below:

Risk Rating	Score	Minimum Intervention Frequency
A	92 or higher	At least every 6 months
B	72 to 91	At least every 12 months
C	52 to 71	At least every 18 months
D	31 to 51	At least every 24 months
E	0 to 30	A programme of alternative enforcement strategies or interventions every 3 years

3.4.4 Inspections - Categories A-E

Approx 320 planned inspections per annum

(Average total working days per year per FTE officer: 338 days; for time available see table 3.4.7)

Allocation of inspections to officers is carried out by the Senior EHO who will allocate based on the available resources, previous inspection information and levels of competency required, the number of inspections allocated fluctuates per season/per year allowing for other statutory duties to be completed. Officers split their time between inspections and non-inspection food responsibilities, with Category A - C food inspections being priority.

3.4.5 Food hygiene responsibilities outside of the inspection programme:

- Food Sampling
- Monitoring of local events for food traders

- Street auditing for premises changes
- Complaints regarding food premises and unsatisfactory food
- Food Alerts
- Infectious disease notification work
- Projects and Campaigns
- Reviewing public internet/social media sites for intelligence

3.4.7 Staffing Resource – Food & Safety Team

SEHP Senior Environmental Health Practitioner x 2 from 1st April 2026
FSO Food & Safety Officer x 2 from 1st April 2026

Post	SEHP 1.0 FTE	SEHP 0.6 FTE	FSO 1.0 FTE	FSO 1.0 FTE
Deduction for Statutory Health and Safety Duties	5%	70%	5%	20%
Deduction for Management Duties	30%	10%	0%	0%
Food Inspections A-E	50%	15%	70%	65%
Other Food Work	10%	5%	20%	15%
Private Water Supplies	5%	0%	5%	0%
Required CPD	30	30	20	20
TOTAL FOOD FTE:	0.65	0.2	0.95	0.8

3.5 Regulation Policy

The Council adopted the Enforcement Concordat for all appropriate services. The Food Law Enforcement Plan has been developed in line with best practice and advice/guidance from the Food Standards Agency (FSA).

4. Service Delivery

4.1 Food Premises interventions Statement (Statutory Duty)

The interventions programme for food premises on all categories of premises forms the core activity of the Food & Safety Team. The programme of interventions has been prepared to meet the aims, objectives and priorities summarised in paragraph 2.1 of this document in line with the Food Law Code of Practice (England).

4.1.1 Intervention reports: (FSA Food Law Code of Practice)
Checklists and aides-memoire are used at each inspection for consistency purposes, depending on high risk or low risk premises, and are used at the end of the inspection to produce a written report of the officer's findings. A full inspection report is provided to businesses following every inspection, so it is clear what they have to do and within a specified timescale. Where there are a number of serious contraventions, a holding report may be left, and a full inspection report is delivered/emailed/posted once completed.

4.1.2 Types of interventions: Full inspections/ Partial Inspections/ Audits. (Statutory duty)

The presumption is that enforcement officers in all cases will undertake full inspections of all parts of the premises. However, there are options available for partial inspections and audits. Officers, after

researching the previous history of the premises, may decide to carry out a partial inspection. The options are considered in a little more detail below:

Full Inspection: (FLCOP)
This is a check on compliance with legal requirements in accordance with elements set out in the Code. A full inspection will consider all aspects of a food business including structure, food safety management and management arrangements.

Partial Inspection: (FLCOP)
An inspection that covers only certain elements of the inspection as laid down in the FLCOP. Where there are increasing numbers of inspections and limited staffing resources the use of partial inspections could be implemented for Category D/E premises rated FHRS 5 at the previous inspection

Planned audits (FLCOP)
An audit may be undertaken instead of a partial or full inspection, where any food business operator, including those providing a high-risk business has put in place an acceptable documented food safety management system (addressing Article 5 Regulation 852/2004). Details of the system will be required in advance of the audit so the Officer can plan the appropriate audit.

The audit may include one or more of the following elements (FLCOP).

- Complete audit of the food safety management system
- Audit of selected elements of the food safety management system where the system is complex
- Partial Audit concentrating on a particular produce
- Operational audit concentrating on certain arrangements such as temperature monitoring.

4.1.3 Revision of intervention rating: (Statutory duty)

On completion of the food inspection, partial inspection or audit the officer will revise the intervention rating of the establishment in accordance with FLCOP. The FHRS rating is also awarded based on this scoring, records of the inspection are left with the FBO at the conclusion of the inspection, the premises may be scored at the end of the inspection on site or may be scored once the officer has returned to the council offices, in the latter case the food business will be notified on the inspection report within 10 days.

4.1.4 New premises (FLCOP) (Statutory duty)

GBC responds positively and supportively to new food businesses which approach the authority prior to starting up. Following receipt of the registration, an officer will make initial contact with the business to arrange an inspection. An initial advisory visit may be provided in exceptional circumstances, the preferred method is to visit the premises after a food registration has been received so that the advice given can be recorded, which may avoid disputes on what was said at the time, if a pre-inspection visit does take place, a written record of what was agreed at the time is left with the FBO. There is an obligation to register the food premises 28 days before any food activities take place

In all cases, new registrations will be recorded onto the Uniform database once received and then an initial full inspection will take place in line with the FLCOP.

4.1.5 Routine planned inspections – high risk premises (A and B rated) (FLCOP) (Statutory duty)

The preferred method for A and B premises is to carry out a full inspection, unless a partial one or audit has been decided after reviewing the premises history. All such interventions are identified as appropriate by the FLCOP.

4.1.6 Planned interventions medium risk (rated C) (Statutory duty) (FLCOP)

Until an establishment is considered to be 'broadly compliant' an intervention will comprise either a full inspection, partial inspection or audit as defined above at the frequency identified by Annexe 5 FLCOP.

Once it is broadly compliant, planned interventions may alternate between inspections, partial inspection or audits and other official controls as defined in the Food Law code of practice and listed below;

- Monitoring
- Surveillance
- Verification
- Audit
- Sampling for analysis (more than just a visit to collect a sample)

Broadly compliant is defined as: An establishment that has an intervention rating score of not more than 10 points under each of the following three parts of Annexe 5:

Part 1 – Hygiene & Safety
Part 2 - Structure
Part 3 - Confidence in Management

4.1.7 Planned interventions low risk premises (rated D) (Statutory duty) (FLCOP)

Interventions can alternate between an official control and an intervention that is not an official control, (for example a questionnaire) the frequency will remain that established by the Food Law Code of Practice Annexe 5. Category D establishments that are rated 30 or 40 for 'type of food and method of handling' must be inspected, partially inspected or audited. Interventions such as questionnaire, although a useful resource saving method, may not be appropriate because the premises cannot be rated for the FHRS without an inspection.

4.1.8 Planned Interventions low risk premises (rated E) (Statutory duty)

Premises in this category will be subject to alternative interventions at least once every three years in accordance with the Food Law Code of Practice. Where there are some high-risk practices but low numbers of customers an inspection may still be carried out. Where a category E business is in the FHRS it will always receive an inspection, partial inspection or audit. Officers are given discretion where Cat E premises require inspection as to the intervention type.

4.1.9 Alternative Enforcement Strategies (Statutory duty) (FLCOP)

Premises in this category (E) can be subject to alternative interventions at least once every three years in accordance with the Food Law Code of Practice, unless the premises is subject to Approval. These are not considered useful methods for some businesses because the premises cannot be rated for the FHRS without a full inspection and often businesses require a rating to be able to trade at events. Alternative Enforcement cannot be used at the initial inspection following registration as the premises must have an initial visit so that an officer can give an appropriate risk rating for future enforcement.

4.1.10 Food Hygiene Rating Re-Rating Requests (Mandatory FHRS)

Where a business receives a food hygiene rating that is less than 5, they may choose to apply for a new inspection of the premises in order for a new rating to be calculated. Businesses will be advised that this application should ideally be made once all the works identified in the original inspection have been completed and an officer has signed them off. There is a cost recovery charge for this service which is payable by the food business operator before an inspection takes place. It is made clear to businesses that there is no guarantee that the score will improve at the new inspection and this is not a 'Pay for a 5' service. Inspections that take place are treated as new interventions and all areas are re-assessed for compliance. The charge for this service will increase at the rate consistent with all fees and charges on an annual basis.

4.1.11 Large scale public events

To improve the prospects for the Borough larger events such as markets and festivals are encouraged. These will range from small and local events to major showcase events such as the 'Riverside Festival'. The Food & Safety Team has a system in place to respond to such events and carry out risk-based desktop assessments using the information requested from event organisers before the event takes place. Some events are spot checked by food officers to match check operator and food type data held on the database against premises on site and to check businesses that may be registered with other local authorities.

4.2 Approved Premises

Approved premises are wholesale food businesses supplying food of animal origin that require approval by the competent authority under Regulation 853/2004. The process of approval includes a complex and detailed assessment of the premises and its activities and includes a specialist assessment of the specific microbiological risks associated with any processes and how these will be safely managed.

Due to the specialist nature of approved premises applications, the initial approval of premises subject to product specific legislation is restricted to those authorised officers who have undertaken relevant training and are deemed competent by the Lead Officer for Food Hygiene. Currently, two officers are authorised to undertake approved premises inspections. The approval of premises is highly resource intensive and can require months of intensive work by a single officer who must prepare a full approval report. Premises are usually granted approval for more than one criterion, and an assessment must be carried out for each.

Gravesham currently has 1 premises requiring approval however this is constantly under review and new applications for approval can be received at any time.

4.3 Food complaints (Statutory duty)

All incoming food complaints are directed to the Food & Safety inbox and are triaged by a senior officer. The complaint is then passed to the officer who deals with the premises should further action be required. The officer considers following key criteria:

- Implied or actual risk to public health – public health significance
- Justification/seriousness or likely impact of the complaint
- Likely recurrence in the future
- Number of complainants

- Number of people potentially at risk
- History of premises from which food was produced/purchased/consumed etc.
- Last inspection details if relevant
- Date of next scheduled inspection

All complaints will receive an initial response depending on risk. Those classed as high risk will have an initial response within 24 hours and all others will have a response within 5 working days. Anonymous complaints will be investigated at the discretion of the Lead Food Officer. Initial response may comprise a visit, phone call or a letter / email depending on the nature of the complaint and the outcome of the assessment.

Complaints regarding single cases of suspected food poisoning receive a standard letter / email which explains the onset times and the criteria of sampling through a GP or hospital to confirm food poisoning. The information provided in this letter / email is very comprehensive and educative. Cases involving two or more people are investigated in line with outbreak control procedures.

Complaints are investigated according to risk and the information provided. If a visit is warranted, where possible the next inspection will be brought forward and carried out at the same time as the complaint visit. Complaints are dealt with by officers, and changes to inspection frequency may be required. Complaints are included in the audit regime.

4.4 Primary Authority Scheme (Mandatory)

We recognise the Better Regulation Delivery Office ‘Primary Authority Scheme’. Inspection plans will be followed where required and it is expected that contact will be made with Primary Authorities as where advice or enforcement action is considered, before action is taken against those premises who have a Primary Authority.

Primary authority partnerships are available to any business that trades across two or more council boundaries, regardless of size. Primary Authority partnerships are legally nominated by the Better Regulation Delivery office and partnerships are automatically recognised by all local regulators.

4.5 Advice to business (mandatory & corporate plan)

The service is committed to ensuring that advice and support is available to all food businesses in the Borough when requested.

The key ways this is provided is through;

- GBC Website; Reviewed annually to ensure accuracy and usefulness of data
- Emailed links: Use is made of FSA website, starting up guidance and SFBB booklets
- Verbal advice; This is absorbed into routine work and will take place either in the case of routine official interventions or resulting from business enquiries for new or changed premises.
- Advisory Visits for New Businesses; Food businesses with complex processes or approval applications may be considered for an advisory visit.

4.6 Food Sampling (Mandatory)

Food sampling and subsequent analysis and examination performs an essential function, providing intelligence and evidence on the safety and authenticity of food on the UK market, supporting enforcement action to protect consumers, and enabling the FSA to meet its statutory obligations as a Central Competent Authority.

Food sampling is undertaken effectively and consistently in accordance with the requirements of the Code, and Practice Guidance. We take part in both the UKHSA National sampling programme and local sampling as appropriate.

Routine samples
Within resources, GBC will take samples to meet local needs, UK UKHSA and the Food Standards Agency.

Environmental Swabbing
Environmental swabbing of food premises is a proven, cost effective, enforcement tool. Swabs can be tested for E Coli 0157 and other specific pathogens as well as general hygiene indictors. The results can clearly demonstrate serious lapses in cross contamination control, personal hygiene and faecal contamination, all areas that can be difficult and time consuming to evaluate during routine inspections.

Sampling at Approved Premises
The Sampling Policy includes detailed information about the sampling of any Approved Premises registered with the Borough in accordance with the Food Law Code of Practice. An annual sampling programme is put together commencing in April each year. The programme includes sampling activities for Approved Premises. Each Approved Premises also has its own sampling plan which is kept in the Approved Premises File. Only trained and authorised officers should undertake the sampling at Approved Establishments and only those with specialist knowledge of the premises and processes being undertaken will be permitted to create and amend sampling plans

4.7 Infectious disease control and investigation (Statutory duty)

Officers investigate food related infectious disease notifications in accordance with the documented procedures, which are reviewed regularly. The primary objective of every investigation is to identify the cause of infection and prevent any further spread.

Response times and the nature of response are all set out in the procedures documented in the ‘UK Health Security Agency Single Case Plan for Kent and Medway Environmental Health Teams and Kent, Surrey and Sussex Health Protection Team’.

Officers liaise with the UK Health Security Agency, a number of ‘Proper Officers’ are currently appointed under the Public Health Act 1984 and Section 47 of the National Assistance Act 1948 (as amended).

4.8 Food Alerts/Incidents (Statutory duty)

A food incident is considered to be any event where, based on the information available, there are concerns about actual or suspected threats to the safety or quality of food that could require intervention to protect consumers’ interests. GBC receives routine reports of Food Alerts which in most circumstances do not require additional input from the enforcement officers; they are dealt with as part of normal duties. Where specific requests for action are received through the FSA Link system the Food & Safety Team will seek to treat this as a priority where possible.

4.9 National Food Hygiene Rating Scheme

In April 2011, the Food Standards Agency made representations to all Local Authorities on the implementation of the National Food Hygiene Rating Scheme. Gravesham Borough Council runs the FHRS within the borough.

The Food Hygiene Rating scheme makes it easier for consumers to choose places with good hygiene standards when they're eating out or shopping for food. The food hygiene rating tells them about the hygiene standards by awarding a 'star rating' which is shown by way of standard stickers. The same stickers are used across the whole of the UK, by participating local authorities.

4.10 Liaison with Other Organisations

The team works in partnership with other organisations to deliver services, some examples are given below:

External Partnerships/Liaisons.

Department/Organisation	**Services**
Customs and Excise (HMRC) & UKBA	Imported Foods and potential Fraud
Association of Port Health Authorities (APHA)	Imported Food, air and sea port
Kent Environmental Health Managers (KEHM) Food Technical Working Group	County-wide liaison group for all food safety issues with representatives from the Health Protection Agency and Trading Standards as well as local Authorities.
Thames Port (City of London)	Port Health, advice and support, Shellfish Sampling
Trading Standards	Food Complaints, Port Health
Food Standards Agency	Advice and Support on all food matters
UK Health Security Agency	Outbreak Control or ID Advice
Kent Food Sampling Group	Sampling advice and guidance
Southeast Approved Premises Group	Approved premises advice and guidance
Health and Safety Executive	RIDDOR/Gas Safety/Electricity at Work
CIEH	Various advice, Staffing, CPD, Policy

Internal Partnerships

External partnerships and liaisons are good; the sharing of information with internal partners is improving. Particularly important partnerships include the Events team, Licensing Department, Building Control, Estates Team and Planning Department who make the best use of shared intelligence, all within FOI and data protection criteria.

4.11 Promotional Work

The overall resources available to the Food & Safety Team have reduced, all working practices have been frequently reviewed and in turn, this has streamlined activities like promotional work, which is now based on FSA promotions only.

5. Resources

5.1 Financial Allocation

Financial Allocation to the Service is managed by the Head of Community Protection, the general budget management is carried out by the Regulatory Services Manager and Senior EHOs. The Council has taken into consideration the correspondence sent to all Chief Executive Officers by the Food Standards Agency in 2025 requesting that resourcing to food teams in local government is prioritised.

5.2 Staffing Allocation

The resources for Food Safety and related duties are currently:

Post	Number (FTE)	
Senior Environmental Health Officer	1 2	0.65 0.2
Food and Safety Officers	1 2	0.95 0.8
Total	**FTE 2.6**	

5.3 Qualifications and competence

The required competence and qualification of officers is set out in the Food Law Code of Practice and Practice Guidance published by the Food Standards Agency in October 2025.

Current Officers and Qualifications 2025

Name/Job Title	**Qualifications Held**
Clare Reed Senior Environmental Health Officer	MSc Occupational Safety & Health – April 2003 BSc (Hons) Environmental Health – July 1998 EHORB Registration – August 1998 Chartered Status – April 2004
Mandy Cartwright Senior Environmental Health Officer	MSc – Food Safety & Control – March 2003 BSc (Hons) Environmental Health – July 1988 EHORB Registration – July 1988 Chartered Status - January 2004
Jeanette Mills Food and Safety Officer	Higher Certificate in Food Premises Inspection - 1996 Advanced Food Hygiene Certificate -1995 BTEC Environmental Health - 1993
Richard Beckett Food and Safety Officer	Higher Certificate in Food Premises Inspection – 2011

	Level 4 Award in Managing Food Safety in Catering – 2009

5.4 Staff development plan

The Council has an annual appraisal scheme in place. Objectives are set annually and 1:1 meetings, together with monthly team meetings. The appraisal scheme includes new staff development plans, improved training plans and encourages meeting attendance. Documentation of training qualifications and training courses attended are recorded and contribute to the issue of authorisations for officers, to consider competence. Appraisals are carried out on an annual basis in April. CPD is monitored throughout the year to ensure that officers are meeting the requirements of the Food Law Code of Practice and the CIEH registration requirements.

5.5 Training and Development

There is a central corporate training budget that can be accessed by team members requiring CPD and training. Officers have the opportunity to apply for funding for specific courses that would aid their development, as well as time off and opportunity to attend FSA food courses.

6. Quality Assessment and internal monitoring

The team is placing considerable emphasis on its effectiveness and accuracy within its available resources. This makes 'getting it right first time' and 'Making every inspection count' particularly important (FSA).

- Audit of the officers' inspections recorded and checked against the inspection report, completed inspection checklist, to ensure that the Annexe 5 scores, the FHRS scores and the chosen star rating agree and are correct, as well as the FHRS status and whether the premises should be included in the scheme. Consistency is considered with regards to the scores and compared against the risk ratings set out in the Code.

- Where an area of concern has been raised in relation to consistency or accuracy, targeting auditing is documented and the results passed to the Regulatory Services Manager for review (targeted auditing) areas are prioritised according to the FSA audit and issues arising from daily activities.

Audit regime includes the following areas:

- Inspections due and carried out within 28 days (sampled audits)
- Intervention anomalies (sampled audits)
- Complaints anomalies (sampled audits)
- Inspection quality
- Premises scoring Premises risk group categories
- Fortnightly upload of FHRS scores to FSA website
- Scores randomly checked on FSA website (sampled audits)
- Correct risk ratings (sampled audits)
- Contraventions identified correctly
- Written warnings annotated for input

7. Review Process

The Food Service Plan will be subject to formal review once every 3 years but will be kept under review annually with any minor amendments updated without the need for formal adoption. Compliance with the Food Service Plan and Food Inspection Programme will be covered within the Gravesham Borough Council Business Plan through quarterly and annual performance updates.