



SOCIAL VALUE POLICY 2025

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1. Description of our Company

Godfrey Group Facilities is an industry leader, providing cleaning services to holiday parks, schools, offices, housing associations, popular venues and shopping centres, as well as building and maintenance services to housing associations, estates and private properties.

We are based in the town of Denbigh, North Wales, however, we hold contacts and employ staff all over the United Kingdom. We provide efficiency, reliability and professionalism across all services. We apply innovative technology ensuring nothing gets side-lined, and progress is reported electronically. We deliver fairness and equality, a passion for the Welsh Language and Culture, respect for ideas and bespoke training for each employee, to the specifications of our sites.

2. Introduction

Godfrey Group recognises the important role it can play in enabling Social Value through our daily operations, procurement, recruitment, training and community work.

Through our approach to social value, we have integrated economic, environmental, and social sustainability into our processes.

3. What is Social Value?

The Public Services (Social Value) Act 2012 came into force in January 2013 cementing the responsibilities of a contracting authority when procuring services contracts subject to public procurement regulations to consider the 'economic, social and environmental wellbeing of the relevant area' in its procurement activity. Godfrey Group understands and is fully committed to meeting the requirements of the Social Value Act. Godfrey Group are implementing this policy into all aspects of its Operational Activities. It is the legal requirement for public sector buyers to move from awarding contracts based on M.E.A.T (Most Economically Advantageous Tender) to M.A.T. (Most Advantageous Tender). This means considering the wider benefits for the community in which the contract will be delivered, such as creating local employment opportunities, carbon emissions reduction or using a local supply chain – all of which naturally fall under the umbrella of Social Value.

4. Why is Godfrey Group considering Social Value in all its operations and activities?

Delivering social benefits while we deliver the main element of our contracts means that there is a magnified benefit for the company. Incorporating social value into our

operations, activities and procurement processes is not difficult and can make a tangible difference to people in the communities in which we hold contracts. At Godfrey Group, we are committed to delivering measurable social value across all our operations. We recognise that our responsibilities extend beyond service delivery, and we actively seek to generate positive outcomes for people, communities, and the environment. Our approach is aligned with the UK Government's Social Value Model and focuses on promoting wellbeing, tackling inequality, supporting skills development, and embedding sustainability.

Adoption of this policy can provide the following benefits:

- ***Encouraging a diverse base of suppliers***

Promoting supplier diversity; including the participation of small and medium sized enterprises (SME's) and 3rd sector organisations, and local suppliers in general;

- ***Promoting fair employment practices***

Ensuring workforce equality and diversity

- ***Meeting targeted recruitment and training needs***

Offering a range of apprenticeship, work experience for educational settings, training and skills development opportunities as well as employment opportunities;

- ***Community benefits maximising opportunities***

Making a social contribution to the local area in which our business is based encourages growth in that area as well as in other local areas where we hold contracts;

- ***Ethical sourcing practices Ensuring compliance with UK, EU and international standards***

Promoting fair trade and fair pricing policies

- ***Promoting greater environmental sustainability***

Minimising waste and pollution, supporting carbon reduction initiatives, furthering energy efficiency and other sustainability programmes.

Social Value is the value an organisation contributes to society beyond a reported profit. At Godfrey Group we have been delivering Social Value for many years. Examples of our Social Value initiatives include donating staff time for volunteering, committing to sustainable procurement practices, offering apprenticeships, work experience and training programmes, buying and employing locally, and reducing carbon emissions. This policy, and other related policies, outlines these examples in further details as well as defining our company's thorough understanding of Social Value and its importance.

5. Volunteering and Community Engagement – Promoting Wellbeing & Community Cohesion

Godfrey Group actively contributes to community wellbeing through staff volunteering and engagement initiatives. Our colleagues support schools by promoting literacy and wellbeing sessions, including activities with our therapy dog, and we encourage participation in grassroots sport through sponsorship of the local football team. We also host school groups at our head office for educational activities and make our facilities available for use by community organisations.

6. Sustainable Procurement Practices – Fighting Climate Change & Driving Responsible Business

We are committed to embedding sustainability across our supply chain. Godfrey Group prioritises local suppliers to minimise carbon emissions associated with transport, while supporting the regional economy. Procurement decisions are based not only on quality and value but also on environmental and social responsibility, including responsible sourcing, waste reduction, and use of products with lower environmental impact. We work collaboratively with suppliers to explore innovation, efficiency, and shared sustainability goals, ensuring our procurement practices contribute to climate resilience and long-term value creation.

7. Apprenticeships, Work Experience and Training – Equal Opportunity & Skills Development

Godfrey Group is dedicated to creating opportunities for skills development and long-term employability. We deliver apprenticeship programmes that enable individuals to achieve industry-recognised qualifications while gaining practical experience. We also collaborate with schools, colleges, and universities to provide meaningful work experience placements that develop employability skills and raise awareness of career pathways within our sector. In addition, we invest in continuous training and professional development for our workforce, ensuring that staff have the knowledge and competencies to deliver high-quality services while supporting personal career growth.

8. Buying and Employing Locally – Tackling Economic Inequality

Godfrey Group maximises the positive economic impact of our operations by prioritising local procurement and employment. We actively engage with local suppliers and SMEs, supporting economic resilience and reducing environmental impact through shorter supply chains. Where possible, goods and services are sourced directly from the communities in which we work, helping sustain regional business growth. We also recruit from local areas, ensuring employment opportunities benefit residents, support household income, and strengthen the long-term economic prosperity of local communities.

5. Godfrey Group Volunteering and Community Engagement Initiatives

Godfrey Group is committed to delivering measurable social value by supporting the communities in which we operate. Our staff actively contribute their time through volunteering, including literacy and wellbeing sessions in schools facilitated with the support of our therapy dog. We invest in grassroots sport by sponsoring the local football team and promoting youth participation. We also provide opportunities for school groups to engage in educational activities at our head office, and we make our facilities available to local community groups to support their development and cohesion.

6. Sustainable procurement practices

Godfrey Group is committed to embedding sustainability into all aspects of our procurement activity. We prioritise the use of local suppliers wherever possible to reduce carbon emissions associated with transportation and to support the regional

economy. Our supply chain partners are selected not only on the basis of cost and quality but also on their environmental and social performance. This includes ensuring responsible sourcing of materials, reducing waste, and encouraging the use of products with lower environmental impact. We also work collaboratively with our suppliers to identify opportunities for innovation, improved efficiency, and shared social value outcomes.

7. Apprenticeships, Educational Work Experience and training programmes

Godfrey Group is committed to developing skills and creating employment opportunities through structured apprenticeships, educational work experience, and ongoing training programmes. We are able to provide apprenticeship opportunities that enable individuals to gain industry-recognised qualifications while developing practical experience within our business. We also partner with schools, colleges, and universities to offer meaningful work experience placements, helping young people to understand career pathways and develop employability skills. In addition, we invest in continuous training and professional development for our workforce, ensuring staff have the knowledge, skills, and competencies required to deliver high-quality services while supporting long-term career progression.

8. Buying and Employing Locally

Godfrey Group is committed to maximising social and economic impact by prioritising local procurement and employment in line with the Social Value Model theme of *Tackling Economic Inequality*. We actively engage with local suppliers and contractors, supporting small and medium-sized enterprises (SMEs) and reducing environmental impact through shorter, more sustainable supply chains. Wherever possible, we source goods and services from within the communities in which we operate, helping to build resilient local economies.

We also promote local employment by recruiting from surrounding areas, ensuring that job opportunities are accessible to local people. This approach not only supports regional economic growth but also enhances community wellbeing by retaining skills and income within the local area.

9. Reducing Carbon Emissions and Promoting Sustainability

Godfrey Group is committed to minimising our environmental impact and promoting sustainable practices across all areas of our operations. We actively seek to reduce carbon emissions through efficient fleet management, use of low-emission vehicles, and optimised logistics planning. In our facilities, we implement energy-saving measures, including LED lighting, energy-efficient equipment, and waste reduction initiatives.

We embed sustainability into our procurement practices by prioritising suppliers and products with lower environmental impact, encouraging the use of recycled and responsibly sourced materials. Staff are trained to adopt environmentally responsible behaviours, and we continually review our operations to identify opportunities for further efficiency and carbon reduction. Through these actions,

Godfrey Group contributes to climate resilience while promoting responsible business practices across our supply chain.

Related Documentation:

ISO 14001 Environmental Management Policy

Environmental and Social Impact Plan

Environmental Aspects and Impacts Register

10. Governance and Communication

Godfrey Group maintains strong governance over all social value activities to ensure transparency, accountability, and continuous improvement. Social value initiatives are monitored and measured through regular review meetings held monthly, where performance and outcomes are assessed against defined objectives. The Social Value Lead, Louisa Godfrey (Director), is responsible for overseeing the collection, analysis, and communication of social value data. Reports on activity and impact are shared with internal stakeholders, including senior management and relevant department heads, and, where appropriate, with external stakeholders, to demonstrate the organisation's social value contributions. Communication is conducted through management dashboards, newsletters, and stakeholder reports to ensure all relevant parties are informed, engaged, and able to contribute to ongoing improvement.

5. Stakeholder Engagement

Godfrey Group actively engages with a wide range of stakeholders, including employees, local communities, customers, suppliers, and delivery partners, to ensure that their needs and perspectives are considered in all social value initiatives. Engagement activities include consultations, surveys, meetings, and collaborative projects designed to gather feedback and identify opportunities for improvement. This proactive approach ensures that our social value programmes are responsive, relevant, and generate meaningful benefits for both internal and external stakeholders.

6. Supporting Policies and Statements

Our Social Value Policy is reinforced by a suite of supporting corporate policies and statements, including the Human Rights Policy, Supplier Charter, Modern Slavery Policy, Carbon Reduction Plan, ISO 14001 Environmental Management Policy, Environmental and Social Impact Plan, Environmental Aspects and Impacts Register. These documents provide a framework for ethical, sustainable, and socially responsible operations, ensuring that our social value initiatives are embedded within the wider governance, compliance, and corporate responsibility structure of the organisation.

7. Key Personnel

Responsibility for the delivery and oversight of the Social Value Policy rests with Louisa Godfrey, Company Director, who is accountable for its implementation, monitoring, and reporting. These individuals ensure that all activities are conducted

in line with policy objectives and that progress is communicated effectively to stakeholders. The named personnel are also authorised to sign off on policy documents and related reports.

8. Policy Review Schedule and Record

The Social Value Policy is formally reviewed annually by the Social Value Lead in conjunction with the senior management team. This ensures that the policy remains current, effective, and aligned with organisational priorities and legislative requirements. Records of each review, including any updates or revisions, are maintained to provide a clear audit trail and demonstrate ongoing commitment to continuous improvement.

9. Glossary of Terms

To support understanding of social value concepts, the policy includes a glossary of key terms, defining concepts such as social value, sustainability, stakeholder engagement, and community impact. This ensures that all readers, regardless of prior experience with social value, can fully understand the requirements, expectations, and terminology used within the policy.

Date of next review: January 2026

Data Protection applies to information kept on staff, customers and account holders, for example when we:

- recruit staff
- manage staff records
- market our products or services
- use CCTV

This could include:

- keeping customers' addresses on file
- recording staff working hours
- giving delivery information to a delivery company

In meeting our GDPR obligations Godfrey Group will ensure that: -

- It has in place procedures for complying with the six principles.
- Training on our data protection duties shall be mandatory for all staff. All new staff receive appropriate data protection training on induction and that refresher training and guidance is provided periodically, so that they understand that they are contractually responsible for complying with the law and know how to process information in accordance with these 6 principles.
- Advanced level training is provided to those members of staff who deal with highly sensitive personal information, where this may be required or relevant.
- Everyone managing and handling personal information are individually and collectively responsible for compliance with this policy.
- A failure to follow this policy may result in disciplinary action or even criminal prosecution in the case of a wilful and deliberate breach.
- That individuals are informed of the purposes for which their data will be used and that consent is sought for such use, where required under the Act. Examples of model privacy notices are attached as an appendix to this policy.
- All staff are trained to recognise a subject access request and what to do about one.
- All appropriate, technical and organisational security measures to safeguard personal information will be put in place including encrypting or ensuring

increased security settings of removable devices such as laptops or mobile phones and restricting the use of USB sticks.

- All staff are required to report data security breach incidents, including 'near misses' to their line manager who shall inform the Directors immediately.

Individual's Rights

The company will ensure that individuals can exercise their rights as set out in the Act including:-

- the right to be informed of the purposes of the processing;
- the categories of personal data being processed;
- the right of subject access to their personal information;
- who will or is likely to receive their information;
- the envisaged period for which the data will be stored;
- the right to prevent processing of personal information in certain circumstances;
- the right to rectify, block, erase, restrict, object or correct inaccurate information;
- the right to lodge a complaint;

These rights apply to all living, identifiable individuals on whom the company processes personal information.

Subject Access Requests

Article 15 of the GDPR provides the right for individuals to be told by the Data Controller (the organisation who determines the purposes for which and the manner in which personal information is processed)

- if we hold information about them,
- to ask what we use it for,
- to be given a copy of the information,
- to be given details of other organisations or people we disclose it to,
- to ask for incorrect data to be corrected,
- to ask us not to use personal information about them for direct marketing,
- to be compensated for damage or distress if we do not comply with the Act,

- to object to decisions made only by automatic means – for example where there is no human involvement,
- to ask the Information Commissioner's Office to investigate and assess whether we have breached the Act.

The company will supply this information providing the request is made verbally or in writing, and it is sufficiently clear what personal information is being sought; therefore sufficient information should be given by the applicant to enable the company to locate the information requested.

There is no fee applicable and the company should respond within one month, unless the request is complex or multiple, in which case it may be extended by two further months. The company will inform the applicant if it is extending the time frame in such circumstances setting out the reasons as to why.

The company will respond to such requests within one month, unless the request is manifestly unfounded or excessive. There is no definition within the Act, but in respect of an 'excessive' request, it is generally taken to mean that the effort the organisation would have to expend in complying with the requirement to provide a copy, is disproportionate to the benefit to be derived by the individual in receiving it. In such circumstances the company will refuse the request.

Advice should be sought from the company's Data Protection Officer in the first instance, ideally before the company commence their search and collation of the data.

Where the individual makes a request electronically, the company will provide the information in a 'commonly used electronic format' in accordance with the GDPR; unless the applicant requests otherwise.

A request for personal information should be submitted on the standard form in

What if the data includes information about other people?

Applicants will not automatically be given access to parts of their information which also identify other people, without that third party's agreement, even if they are related. Disclosure will depend on the context and whether information is already within knowledge and all the circumstances of the case. Seek advice if in doubt.

The Act says that the company would not have to comply with the request if it would mean disclosing information about another individual who can be identified from that information, except if:

- the other individual has consented to the disclosure; or
- it is reasonable to comply with the request without that individual's consent.

In determining whether it is reasonable to disclose the information, the company must take into account all of the relevant circumstances, including:

- the type of information that would be disclosed;
- any duty of confidentiality owed to the other individual;
- any steps taken to seek consent from the individual;
- whether the other individual is capable of giving consent;
- any express refusal of consent by the individual.

These are areas should be taken into account, but they are not necessarily determinative, as the decision is one for the company to make, balancing the data subject's rights against other individual rights.

Requests from third parties (eg the Police) for an individual's personal information

Occasionally the company may receive formal requests under the Act from other agencies or third parties such as the police, DWP or HMRC, solicitor's firms etc, to physically access or receive a copy of the information relating to an individual. These sections do not provide the company with an automatic reason to disclose, as is explained below.

The Act deals with several situations in which personal data is processed for the following 'crime and taxation' purposes:

- the prevention or detection of crime;
- the capture or prosecution of offenders; and
- the assessment or collection of tax or duty.

The personal data could be disclosed if the disclosure is for any of the above crime or taxation purposes and the above purposes are 'likely to be prejudiced' if the company did not disclose eg to the police or the inland revenue. The threshold for disclosure in these circumstances needs to be more than a mere risk of prejudice and needs to be a significant and weighty chance of prejudice to the above purposes. In such circumstances you would need the third party to set out what information they wanted to see (or envisaged) and what legal powers they are relying on and evidence of identity. Seek advice from the Data Protection Officer or legal services if in doubt.

Disclosure of personal information over the telephone or face to face without establishing the identity of the recipient should be avoided.

What about our external suppliers and the company outsourcing personal data processing?

The company uses third party organisations to perform some of its functions. Where such 'outsourcing' arrangements involve the processing of personal data,

certain legal obligations are placed on the company to ensure this supplier looks after the personal information in the same secure way as the company does. These obligations are more onerous now under GDPR than under the old data protection legislation therefore extra care needs to be taken when entrusting a third party supplier with personal data. Seek advice if you are in doubt.

Introduction of new systems that affect personal information – what should the company consider?

In developing information systems or new business processes or changes to our existing processes, that involve personal information, it is now a requirement to carry out a Data Protection Impact Assessment (DPIA) and to build in privacy-friendly solutions as part of modernising or introducing new systems. This is referred to under the GDPR as 'Privacy by Design and Default' and the DPIA can be a useful tool to help identify risks and help the School manage those risks and where possible eliminate them.

Email use

Company staff should only use an authorised email account to communicate in respect of Godfrey Group business and functions. Under no circumstances should staff (including fixed term, temporary, supply, agency or otherwise) use their personal email account to communicate with regards to company issues, in order to protect all individuals concerned. Any staff member communicating in breach of this policy may face disciplinary action.

Data Security Breaches

All data security breaches, including 'near misses', must be reported to the Line Manager responsible, who shall immediately inform the Director who shall advise on the necessary steps that need to be taken to contain any resultant damage and inform individuals who may be affected. A central record of all breaches will be retained and serious breaches must now be reported to the Information Commissioner's Office. There is a standard breach notification form on their website.

Oversight arrangements and review of policy

This policy will be reviewed no later than December 2024. Compliance with this policy and related procedures will be monitored by the Directors.

Complaints

A review of the company's decision to *withhold* personal information where an applicant has made a subject access request, can be made to the Company's Data

Protection Officer who will facilitate a review. If the decision is upheld, and the applicant remains unsatisfied they may appeal to the Information Commissioner's Office

Contact details

Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel 01625 545745

www.informationcommissioner.gov.uk

Appendix 1

Seven **golden rules**
for information sharing

- 1. Remember that the Data Protection Act is not a barrier to sharing information** but provides a framework to ensure that personal information about living persons is shared appropriately
- 2. Be open and honest** with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- 3. Seek advice** if you are in any doubt, without disclosing the identity of the person where possible.
- 4. Share with consent where appropriate** and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case.
- 5. Consider safety and well-being:** Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.
- 6. Necessary, proportionate, relevant, accurate, timely and secure:** Ensure that the information you share is necessary for the

purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.