



Progressive Recovery Care (PRC) Group LTD

Confidentiality Policy

Companies House Number: 15768666

Document Title	Confidentiality Policy
Organisation	Progressive Recovery Care (PRC) Group LTD
Version	1.0
Effective Date	June 2026
Review Date	June 2027 or sooner following significant change, incident, regulatory update or change to service model
Approved By	Ben Tabi Ebarebesem, Director / CQC Contact Person; Geneva Tabe Nkongho, Registered Manager / Clinical Lead
Policy Owner	Information Governance Lead / Registered Manager
Document Status	Controlled Document

1. Policy Statement

Progressive Recovery Care (PRC) Group LTD is committed to protecting confidential information and maintaining the trust of service users, families, staff, commissioners and partner organisations. Confidentiality applies to all personal, clinical, safeguarding, workforce, commercial and organisational information handled by PRC.

PRC currently operates as a remote-only CQC registered independent mental health and neurodevelopmental service. The service supports children, young people and adults aged 4-65 through secure digital platforms and the EMIS clinical system. If PRC expands into face-to-face provision in the future, this will only take place following any required update or variation to the organisation's CQC registration and after relevant premises, health and safety, infection prevention, information governance and operational risk assessments have been completed.

2. Purpose

- Ensure confidential information is handled lawfully, fairly and securely.
- Support safe clinical care while respecting privacy and dignity.
- Explain when information may be shared for care, safeguarding, legal or regulatory reasons.
- Ensure staff understand their confidentiality responsibilities during remote working and any future face-to-face provision.

3. Scope

This policy applies to directors, employees, associate clinicians, contractors, volunteers, students and any person working on behalf of PRC.

4. Confidential Information

- Clinical records, assessments, diagnoses, therapy notes, medication records and risk assessments.



- Personal details including name, date of birth, contact details, NHS number and GP details.
- Safeguarding, child protection and adult protection information.
- Staff employment, DBS, occupational health, training and payroll information.
- Commercial, governance, contract and commissioning information.

5. Staff Responsibilities

- Access information only where required for their role.
- Never share passwords or allow unauthorised access to records.
- Use secure systems, including EMIS and approved secure email routes.
- Hold remote consultations in private and ensure conversations cannot be overheard.
- Report confidentiality breaches, near misses or concerns immediately.
- Maintain confidentiality after leaving PRC employment or contractual engagement.

6. Sharing Information

Information will only be shared where there is a lawful basis and where sharing is necessary, proportionate and relevant. Consent will be sought where appropriate, but information may be shared without consent where required for safeguarding, prevention of serious harm, legal obligations, direct care or regulatory requirements.

7. Remote Working Controls

- Use password-protected and encrypted devices.
- Lock screens when unattended.
- Avoid storing confidential data locally unless authorised and encrypted.
- Use secure internet connections and approved systems.
- Keep paper records to a minimum and store any hard copy information securely.
- Apply a clear desk and private workspace approach at home.

8. Breaches of Confidentiality

Any breach or suspected breach must be reported immediately under PRC's Incident Management and Data Protection procedures. Serious incidents may be reported to the ICO, CQC, commissioners or safeguarding bodies where required.

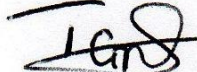
9. Monitoring and Review

This policy should be read alongside PRC's Information Governance, Safeguarding Adults and Children, Incident Management, PSIRF, Complaints, Business Continuity, Data Protection and Clinical Governance policies.



Approval and Signatures

This policy has been approved for use within Progressive Recovery Care (PRC) Group LTD and will be reviewed in accordance with the review date or earlier if required.

Approved by Director / CQC Contact Person	Approved by Registered Manager / Clinical Lead
 Ben Tabi Ebarebesem Date: June 2026	 Geneva Tabe Nkongho Date: June 2026

Document Control

Version	Date	Summary of Changes	Approved By
1.0	June 2026	New policy created / updated for remote service model and future face-to-face provision subject to CQC registration update	Ben Tabi Ebarebesem; Geneva Tabe Nkongho