



Wilson&Wilbur

Turning research into real-world impact



Data Governance and Principles

Our data governance policy ensures that all data, especially Personal Health Information (PHI) and sensitive client records, is managed according to the highest standards of ethics, security, and compliance.

Accountability

Designating clear roles and responsibilities for data ownership, stewardship, and security across the project lifecycle.

Integrity and Quality

Ensuring data is accurate, complete, consistent, and validated by our embedded researchers before being used for reporting or analysis.

Compliance

Adhering strictly to all applicable regulatory frameworks, most critically PHIPA (for health data), PIPEDA, and FIPPA (for broader public sector data).

Security and Confidentiality

Implementing robust technical and physical safeguards to protect data from unauthorized access, loss, or disclosure, reinforced by a robust cybersecurity liability insurance coverage.

Transparency

Documenting all data flows, processing activities, and access controls to ensure clear audit trails and stakeholder trust.

Data Lifecycle and Processing Policies

Our policy dictates strict control at every stage of the data lifecycle:

Data Collection and Minimization

Purpose Specification: Data will only be collected for the explicit purposes agreed upon in the project (e.g., satisfaction surveys, focus groups).

Data Minimization: We will limit the collection of Personal Health Information (PHI) to the minimum necessary required to achieve the research objectives.

Informed Consent: For qualitative components (interviews, focus groups), explicit, informed consent is mandatory.

Data Storage and Residency

Canadian Data Sovereignty (The M2 Standard): All client data, including PHI, will be **accessed, used, and stored exclusively within Canada**.

Encryption: All PHI and PII must be encrypted both **in transit** and **at rest** using industry-standard protocols.

Physical Security: Data centers utilized must adhere to Tier 3 standards or higher, with access controls, power redundancy, and continuous monitoring.

Data Access and Usage (Role-Based Access Control)

Need-to-Know Basis: Access to raw, identifiable data is granted only to employees and embedded researchers strictly on a **need-to-know basis** necessary for their defined project role.

Researcher Ethics: Embedded researchers must operate under ethical protocols (aligned with REB standards) that prioritize **data aggregation and anonymization** prior to reporting (R4).

Regulatory Compliance Framework

Wilson&Wilbur commits to managing data under the following key Canadian regulations:

Personal Health Information Protection Act (PHIPA): Mandatory compliance for handling patient and family data, governing collection, use, disclosure, and data residency in Ontario.

Freedom of Information and Protection of Privacy Act (FIPPA): Compliance related to managing stakeholder and public-sector client data, ensuring transparency while protecting personal information.

Accessibility for Ontarians with Disabilities Act (AODA): Ensures all survey administration methods and data collection processes are accessible.

Incident Response and Auditing

Breach Protocol: We maintain a formal, tested **Breach Notification and Incident Response Protocol** that dictates immediate action upon discovery of a data security incident. This includes mandatory steps for investigation, containment, risk assessment, and notification of the client and the Information and Privacy Commissioner (IPC) where required by PHIPA.

Financial Assurance: Our **robust cybersecurity liability insurance coverage** serves as a financial safeguard for all clients against costs associated with data recovery, legal fees, and regulatory penalties stemming from a security incident.

Auditing and Review: The Data Governance Policy is subject to **annual review and audit** by Wilson&Wilbur's Compliance Officer to ensure its continued effectiveness and alignment with evolving regulatory and security landscapes.

**For more information, please
contact us**

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