

Digital Clinical Data Governance Checklist

For Structured, Unstructured, and AI-Enabled Clinical Systems

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Digital tools are now embedded across clinical practice — from electronic health records and outcome monitoring systems to messaging platforms, portals, scheduling tools, and increasingly, AI-enabled features.

As these systems evolve, the nature of clinical data is also changing. Many platforms now collect and generate not only structured information (such as forms and scores), but also unstructured data (such as free text entries, messages, audio, metadata, and system-derived or AI-generated insights). These developments introduce governance considerations that traditional consent language, policies, and vendor agreements were often not designed to address.

This checklist was created to support clinics, agencies, and private practitioners in reflecting on how digital clinical information is collected, used, stored, accessed, and governed in contemporary practice.

This checklist is intended to:

- support ethical and transparent digital practice
- prompt reflection on real-world data flows
- strengthen informed and ongoing consent
- help identify governance gaps early
- support trust between clients, clinicians, and organizations

This checklist is not a legal, regulatory, or compliance audit. It is a practical governance support tool designed to be used alongside professional judgment, regulatory guidance, and organizational policies.

How to Use This Checklist

Field	Instructions
Checkboxes (<input type="checkbox"/>)	Check <input checked="" type="checkbox"/> when the item is addressed or leave unchecked to flag as a gap.
Notes / Actions	Use the notes column to record actions, responsible parties, or follow-up required.
Completion date	Record the date each section was reviewed for accountability and tracking.

Clinic / Organization Details

Clinic / Organization	
Primary Contact	
Date Completed	
Review Cycle	
Digital Systems Reviewed	

Section 1: Purpose and Role of Digital Tools	Date Reviewed	Notes / Actions
<input type="checkbox"/> The clinic has identified the purpose of each digital tool used in practice.		
<input type="checkbox"/> Digital tools support clinical care and professional judgment; they do not replace it.		
<input type="checkbox"/> The clinic understands when tools generate derived or AI-generated insights and how these are used.		

Section 2: Informed and Ongoing Consent	Date Reviewed	Notes / Actions
<input type="checkbox"/> Clients are informed that digital systems are used in their care.		
Consent explains, in plain language:		
◦ <i>what information is collected</i>		
◦ <i>why it is collected</i>		
◦ <i>how it supports care</i>		

<input type="checkbox"/> Consent acknowledges that systems may collect:		
◦ <i>structured data</i>		
◦ <i>unstructured data</i>		
◦ <i>metadata</i>		
◦ <i>derived or AI-generated information</i>		
<input type="checkbox"/> Consent is treated as ongoing and revisited as needed.		

Section 3: Data Mapping and Visibility	Date Reviewed	Notes / Actions
<input type="checkbox"/> The clinic has a general understanding of how data moves through digital systems.		
This includes awareness of:		
◦ <i>data storage</i>		
◦ <i>backups and redundancies</i>		
◦ <i>system integrations</i>		
◦ <i>vendor subcontractors</i>		
◦ <i>analytic or AI processing</i>		
<input type="checkbox"/> The clinic recognizes where data becomes machine interpretable.		

Section 4: Scope and Proportionality	Date Reviewed	Notes / Actions
<input type="checkbox"/> The clinic understands what each system collects, including optional inputs.		
<input type="checkbox"/> Data collection is reasonable, relevant, and proportionate to its stated purpose.		

Section 5: Use and Secondary Use	Date Reviewed	Notes / Actions
<input type="checkbox"/> Data is used primarily to support client care.		
<input type="checkbox"/> Any secondary uses (e.g., quality improvement, aggregation, evaluation) are understood and explained to clients in general terms.		

Section 6: AI and Automated Features	Date Reviewed	Notes / Actions
<input type="checkbox"/> The clinic knows whether AI or automated features are used within its systems.		
<input type="checkbox"/> Inputs and outputs of these features are understood at a high level.		
<input type="checkbox"/> AI supports care and clinical reflection; it does not replace professional judgment.		

Section 7: Data Location and Cross-Border Access	Date Reviewed	Notes / Actions
<input type="checkbox"/> The clinic understands where data may be stored or accessed.		
<input type="checkbox"/> Clients are informed when cross-border storage or access applies.		

Section 8: Access and Confidentiality	Date Reviewed	Notes / Actions
<input type="checkbox"/> The clinic knows who may access data, including:		
◦ <i>clinical staff</i>		
◦ <i>administrative staff</i>		
◦ <i>technical or vendor personnel</i>		
<input type="checkbox"/> Access is role-limited, appropriate, and proportionate.		

Section 9: Security Incidents	Date Reviewed	Notes / Actions
<input type="checkbox"/> The clinic understands how it would be notified of a data or security incident.		
<input type="checkbox"/> A basic response plan is in place.		

Section 10: Records and Retention	Date Reviewed	Notes / Actions
<input type="checkbox"/> Retention, deletion, and archiving practices are understood.		
<input type="checkbox"/> Unstructured and derived data are included in retention planning.		

Section 11: Review and Accountability	Date Reviewed	Notes / Actions
<input type="checkbox"/> Digital practices are reviewed periodically.		
<input type="checkbox"/> Consent materials and governance processes evolve as systems and practices change.		

Additional Notes

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