Privacy Impact Assessment for Non-Ministry Public Bodies

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Use this privacy impact assessment (PIA) template if you work for or a service provider to a non-ministry public body in B.C. and are starting a new initiative or significantly changing an existing initiative.

PART 1: GENERAL INFORMATION

PIA file number:

Initiative title:	Research project: "COVID-19 Conceptual Metaphors in Canadian Public Discourse"
Organization:	University of Northern British Columbia
Branch or unit:	Department of Psychology
Your name and title:	Leah Chambers, doctoral candidate / lecturer
Your work phone:	(236) 792-1704

Your email:	Leah.Chambers@unbc.ca
Initiative Lead name and title:	Dr. William Owen, Professor
Initiative Lead phone:	(250) 960-6259
Initiative Lead email:	bill.owen@unbc.ca
Privacy Officer:	
Privacy Officer phone:	2500-960-5139
Privacy Officer email:	privacy@unbc.ca

General information about the PIA:

Data linking

Is personal information from one database linked or combined with personal information from another database? Is the purpose for the linkage different from the original purpose for which the personal information in each database was originally obtained or compiled? Is this initiative a data-linking program under FIPPA Section 36? Yes [ ] No [ ]   **If this PIA addresses a data-linking program, the Privacy Office must submit this PIA to the Office of the Information and Privacy Commissioner, and be subject to their examination, advice and timelines.**
Common or integrated program or activity
Does this initiative involve a program or activity that provides a service (or services) through a public body and at least one other public body or agency working collaboratively to provide that service? Yes [ ] No [ ]

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Does this initiative involve a program or activity that provides a service (or services) through a public body that is working on behalf of one or more other public bodies or agencies?
Yes ☐
<mark>**No**</mark> ☐
If this PIA addresses a common or integrated program, UNBC must submit this PIA to the Office of the Information and Privacy Commissioner and be subject to their examination, advice, and timelines.
Related PIAs, if any:

1.   What is the initiative?

Describe your initiative in enough detail that a reader who knows nothing about your work will understand the purpose of your initiative and who your partners and other stakeholders are. Describe what you're doing, how it works, who is involved and when or how long your initiative runs.

Our study aims to (1) examine existing biases toward different COVID-19 conceptual metaphors; and (2) measure the effect of exposure to different metaphors on participants' well-being.

At no point do we ask the participants to provide any personal information (e.g., name, DOB, ID number, etc.) that can be linked to their identity.

Conceptual metaphors provide insights into how people attempt to simplify complex explanations and, thus, provide a window into cognitive processes and biases. They are defined as "understanding and experiencing one kind of thing in terms of another" (Lakoff & Johnson, 2003, p.5). We use conceptual metaphors ubiquitously, unconsciously, and intuitively, in all public and private discourse domains.

Ailments, diseases, and pandemics are often conceptually framed as WAR (consider the sentence: "He lost his battle to cancer" or 'We will defeat the pandemic"). COVID-19 conceptual metaphors, which are the focus of this study, are no exception. However, the prevalent usage of WAR metaphors presented in the media to refer to health information has come under considerable criticism in recent years. It has been argued that referring to illnesses in war terms is detrimental to patients' coping and mental well-being (Bates, 2020; Despot, 2020).

The research will include two stages.

(1) We will use Gorilla (www.gorilla.sc) to collect data for our first study. Gorilla is a cloud software platform designed specifically for the behavioural sciences. Here are some key facts about their data security:

Hosting: Gorilla is hosted on Microsoft Azure within the EU (Republic of Ireland) which is compliant with ISO/IEC 27001:2005

Data Ownership: The experiment owner owns the research data that has been collected using Gorilla and has complete control over it.

IP addresses are not provided in the data download from Gorilla platform.

Data Collection:

Participants will take part via a desktop computer or a laptop.

The participants will be recruited on SONA and provided with a link to the experiment hosted on Gorilla, where the software will control the timing of events and recording of the data.

When undergraduate students sign up on the SONA website, the researchers (Leah Chambers and Dr. Owen) do not know who the participants are. When we receive a study sign-up notification, only a participant's ID that is automatically generated on SONA is visible. This participant ID cannot be linked to the participant's name, student ID, or any other private information. At the end of the semester, instructors who offer bonus research participation marks in their courses receive the information about the number of credits each student has earned from the Psychology Department's Senior Lab Instructor, Julie Howard

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(Julie.Howard@unbc.ca) who manages the SONA platform. However, researchers do not have access to the identity of the students who sign up for their studies. All we see is their participant ID.

Therefore, participants' information is anonymized from the very beginning, even before they are forwarded to the Gorilla website from SONA.

Once participants are on Gorilla website, they will first give consent within Gorilla (see attached Consent Form). Participants are made aware that they can opt to not give consent or withdraw from the experiment at any time by closing the web browser.

After the consent form, basic demographics (gender, age, first and second languages), self-reported history of COVID-19, the news sources a participant uses, reaction times and accuracy scores information are collected within Gorilla.

Procedure:

The experiment is a typical Implicit Associations Test where the participants will be presented a target stimulus in writing (i.e., a phrase or a sentence containing a conceptual metaphor of the COVID-19 pandemic) and will be asked to categorize it as either "good" or "bad".

The sequence of events in the experiment will be as follows: 1) a task description will appear on the screen, and the participant will be prompted to press the space bar to proceed to the next screen; 2) instructions will appear on the screen, and the participant will be prompted to press the space bar to proceed to the next screen; 3) a phrase or a sentence containing a COVID-19 conceptual metaphor will appear in the centre of the screen, along with two-alternative response probes ("good" or "bad") presented visually in the upper left and upper right section of the screen respectively; 4) an interstimulus interval (ISI), a fixation mark (+) will appear in the centre of the screen for a total of 500 ms. between trials. The speed and accuracy associated with identifying the target stimuli will be recorded by the computer. The experiment will take no longer than 30 minutes.

Upon completing the experiment, the participant will be presented with a Debriefing Form (see attached Debriefing Form) and forwarded back to the SONA website where the system records

their participation in a research study. Again, researchers do not know which particular students take part in their experiment.

This is how the data collected on Gorilla is anonymized from the start and therefore not linked to individuals. No names will be associated with obtained data, and the researchers have no way of obtaining it. Data will later be exported and analyzed in SPSS or R.

(2) To collect data for our second study, we will employ SurveyMonkey, the application used by UNBC for building online surveys. The principal investigator, Leah Chambers, has previously obtained the SurveyMonkey license from CTLT and completed the required training. Due to the limited number of licences, CTLT only gives licences to support an active project. Once the first stage of the project is complete, we will ask CTLT to renew Leah Chambers's SurveyMonkey license.

Data Collection:

Participants will take part via a desktop computer or a laptop.

Again, the participants will be recruited on SONA and provided with a link to the survey hosted on SurveyMonkey. The researchers will not have access to participants' identity at any point of data collection because the participants' identity is anonymized on SONA and we are unable to see anything other than their randomly assigned participant ID.

Consent: Before beginning the experiment, the participants will give consent within SurveyMonkey (see attached Consent Form). Participants can opt to not give consent or withdraw from the experiment at any time by closing the web browser.

Similarly to the first study, we will collect basic demographics (gender, age, native and second languages), self-reported history of COVID-19, the news sources a participant uses, and their answers to the questions related to a paragraph they read on the screen.

Procedure: The experiment will consist of a participant reading a short paragraph containing a conceptual metaphor of the COVID-19 pandemic and then completing a survey containing a combination of modified questions from positive psychology scales, such as the Psychological

Well-Being Score (Ryff & Singer, 1998), Trait Hope Scale (Snyder et al., 1991), and Silver Lining Questionnaire (Sodergren & Hyland, 2000).

Upon completing the experiment, the participant will be presented with a Debriefing form (see attached Debriefing Form) and forwarded back to the SONA website where the system records their participation in a research study. Again, researchers do not know which particular students take part in their experiment.

2. What is the scope of the PIA?

Your initiative might be part of a larger one or might be rolled out in phases. What part of the initiative is covered by this PIA? What is out of scope of this PIA?

In the process of an ethics application, the REB at UNBC requested that we obtain PIA for the platforms we are using in our study. In our line of research, we never need to ask for personal identification information so the participants' identity is unknown to the researcher from the very beginning. When they sign up on the SONA website, only the participant ID is visible to the researchers. Later, we analyze only aggregate and not individual data.

Additionally, it is likely that we (and other researchers at the department of Psychology) will use the same tools (i.e., Gorilla of SurveyMonkey) for future lab experiments. Working out a standardized PIA procedure would greatly benefit the implementation of the University's research initiatives.

3. What are the data or information elements involved in your initiative?

Please list all the elements of information or data that you might collect, use, store, disclose or access as part of your initiative. If your initiative involves large quantities of information or datasets, you can list categories or other groupings of personal information in a table below or in an appendix.

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Data Element	Rationale for collection, use or disclosure	Method of Collection or Disclosure
Gender	Gender may influence the way individuals process conceptual metaphors.	Online survey (direct question)
Age	Age may influence the way individuals process conceptual metaphors.	Online survey (direct question)
First/second language(s)	We are investigating conceptual metaphors in the English language; non-native speakers may not be familiar with them or process them differently.	Online survey (direct question)
History of COVID-19	Whether or not a participant has previous history of COVID-19 may affect their attitude toward it.	Online survey (direct question)
Family/close friends' history of COVID-19	Whether or not a participant has witnessed COVID-19 infections in individuals close to them may affect their attitude toward it.	Online survey (direct question)
News sources	COVID-19 conceptual metaphors are most frequently found in the news. Different news sources (e.g., newspapers as opposed to Facebook) differ in the ways they relay pandemic-related news.	Online survey (direct question)
Vision	Normal/corrected to normal vision is required to read the text presented on the screen.	Online survey (direct question)
History of reading disorders	Reading disorders may affect the way an individual processes written language.	Online survey (direct question)

3.1   Did you list personal information in question 3?

Personal information is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference.

Yes ☐

Since personal information is defined as any recorded information about an identifiable individual, we are not collecting it (the participants in our study are NOT identifiable).

No ☐

- If yes, go to Part 2
- If no, answer question 4 and submit questions 1 to 4 to your Privacy Officer. You do not need to complete the rest of the PIA template.

4. How will you reduce the risk of unintentionally collecting personal information?

Some initiatives that do not require personal information are at risk of collecting personal information inadvertently, which could result in an information incident.

The risk of unintentionally collecting personal information is reduced by the participants' identities being anonymized on the SONA platform. Since we are only able to see their participant IDs, there is no risk of an information accident that could inadvertently reveal the participants' identity.

PART 2: COLLECTION, USE AND DISCLOSURE

This section will help you identify the legal authority for collecting, using and disclosing personal information, and confirm that all personal information elements are necessary for the purpose of the initiative.

5. Collection, use and disclosure

Use column 2 to identify whether the action in column 1 is a collection, use or disclosure of personal information. Use columns 3 and 4 to identify the legal authority you have for the collection, use or disclosure.

Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	FIPPA authority	Other legal authority
Step 1: Participants sign up on the SONA website where their identity is anonymized.	collection	26(d)	
Step 2: Participants are forwarded to Gorila (or SurveyMonkey in the second experiment) where	collection	26(d)	

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Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	FIPPA authority	Other legal authority
participants sign a Consent Form, participate in an experiment, and are debriefed.			
Step 3: We analyze the data and determine whether any of the demographic characteristics have an effect on participants' reaction times or coping skills and resilience in the context of the COVID-19 pandemic.	use	32(a)	
Step 4: The data will be analyzed and used for a publication in a scientific journal. Raw data may also be made available to other researchers through an open science platform. Data sharing is an important component of open science and is necessary to ensure replicability of research findings.	disclosure	33(2)(c)	

Optional: Insert a drawing or flow diagram here or in an appendix if you think it will help to explain how each different part is connected.

6.   Collection Notice

If you are collecting personal information directly from an individual the information is about, FIPPA requires that you provide a collection notice (except in limited circumstances).

Review the sample collection notice and write your collection notice below. You can also attach the notice as an appendix.

PART 3: STORING PERSONAL INFORMATION

If you're storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

7. Is any personal information stored outside of Canada?

Yes [ ]

No [ ]

(Our study involves the collection of information from ***anonymous*** participants).

8. Does your initiative involve sensitive personal information?

Yes [ ]

No [ ]

- If yes, go to question 9
- If no, go to question 10

9. Is the sensitive personal information being disclosed outside of Canada under FIPPA section 33(1)?

Yes [ ]

No [ ]

If yes, go to question 10

- If no, go to Part 4

10. Where are you storing the personal information involved in your initiative?

After you answer this question go to Part 5.

There is no personal identifiable information that can be linked to an individual collected in the course of our study. Participants' identity is anonymized on SONA website when they sign up for our study. Therefore, the information we later download from Gorilla or SurveyMonkey cannot be linked to the participants' identity as we do not ask for their names or IDs at any point and do not have a way of obtaining them. Part 7 of this document defines personal

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information as information that can be linked to an identifiable individual, which, again, is not the case since the researchers in our study only have access to the participants' automatically generated IDs and not their names or student IDs.

PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA

Complete this section if you are disclosing sensitive personal information to be stored outside of Canada. You may need help from your organization's Privacy Officer. More help is available in the https://www.oipc.bc.ca/resources/guidance-documents/

11.   **Is the sensitive personal information stored by a service provider?**

Yes [   ]

No [   ]

(Our study involves the collection of information from *anonymous* participants on Gorilla). Section 3.1 of this document defines personal information as any recorded information about an identifiable individual. Since the identity of our research participant is anonymized on SONA before they start the experiment, we, by definition, are not collecting any personal information.

- If yes, fill in the table below (add more rows if necessary) and go to question 13
- If no, go to question 12

Name of service provider	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where is the sensitive personal information stored (including backups)?
Gorilla	Gorilla.sc	Ireland

12.   **Provide details on the disclosure, including to whom it is disclosed and where the sensitive personal information is stored.**

The information will be taken out of Gorilla and stored on UNBC servers.

13.   Does the contract you rely on include privacy-related terms?

Yes ☐

No ☐

- Gorilla Privacy Policy -see appendix

15. What controls are in place to prevent unauthorized access to sensitive personal information?

N/A

16. Provide details about how you will track access to sensitive personal information.

N/A

17. Describe the privacy risks for disclosure outside of Canada.

Use the table to indicate the privacy risks, potential impacts, likelihood of occurrence and level of privacy risk. For each privacy risk you identify describe a privacy risk response that is proportionate to the level of risk posed.

This may include reference to the measures to protect the sensitive personal information (contractual, technical, security, administrative and/or policy measures) you outlined. Add new rows if necessary.

Privacy risk	Impact to individuals	Likelihood of unauthorized collection, use, disclosure or storage of the sensitive personal information (low, medium, high)	Level of privacy risk (low, medium, high, considering the impact and likelihood)	Risk response (this may include contractual mitigations, technical controls, and/or procedural and policy barriers)	Is there any outstanding risk? If yes, please describe.
███					

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Outcome of Part 4

The outcome of Part 4 will be **a risk-based decision made by the head of the public body on whether to proceed with the initiative**, with consideration of the risks and risk responses, including consideration of the outstanding risks in question 17. **The public body may document the decision in an appropriate format as determined by the head of the public body or by using this PIA template.**

PART 5: SECURITY OF PERSONAL INFORMATION

In Part 5 you will share information about the privacy aspect of securing personal information. People, organizations or governments outside of your initiative should not be able to access the personal information you collect, use, store or disclose. You need to make sure that the personal information is safely secured in both physical and technical environments.

18. Does your initiative involve digital tools, databases or information systems?

Yes ☐

No ☐

- If yes, work with your Privacy Officer to determine whether you need a security assessment to ensure the initiative meets the reasonable security requirements of FIPPA section 30

18.1 Do you or will you have a security assessment to help you ensure the initiative meets the security requirements of FIPPA section 30?

Yes ☐

No ☐

- If yes, you may want to append the security assessment to this PIA. Go to question 20

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- If no, go to question 19

19. What technical and physical security do you have in place to protect personal information?

███
███
███

20. Controlling and tracking access

███
███

Strategy	
████████████████████████	
████████████████████████	
████████████████████████	
Describe any additional controls:	████████████████

PART 6: ACCURACY, CORRECTION AND RETENTION

In Part 6 you will demonstrate that you will make a reasonable effort to ensure the personal information that you have on file is accurate and complete.

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PIA Determination and Template

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21. How will you make sure that the personal information is accurate and complete?

Individuals will be entering their own data so it is considered accurate at source.

22. Requests for correction

FIPPA gives an individual the right to request correction of errors or omissions to their personal information. You must have a process in place to respond to these requests.

22.1   Do you have a process in place to correct personal information?

Yes ☐

No ☐

(We are not collecting personal information such as names, IDs, etc.)

Sometimes it's not possible to correct the personal information. FIPPA requires that you make a note on the record about the request for correction if you're not able to correct the record itself. Will you document the request to correct or annotate the record?

N/A

Yes ☐

No ☐

22.2   If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FIPPA requires you to notify the other public body or third party of the request for correction. Will you ensure that you conduct these notifications when necessary?

N/A

Yes ☐

No ☐

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23. Does your initiative use personal information to make decisions that directly affect an individual?

Yes [   ]

No [   ]

- If yes, go to question 25
- If no, skip ahead to Part 7

24. Do you have an information schedule in place related to personal information used to make a decision?

FIPPA requires that public bodies keep personal information for a minimum of one year after it is used to make a decision. In addition, the **Information Management Act** requires that you dispose of government information only in accordance with an approved information schedule. **N/A**

Yes [   ]

No [   ]

- If no, describe how you will ensure the information will be kept for a minimum of one year after it's used to make a decision that directly affects an individual.

PART 7: PERSONAL INFORMATION BANKS

A personal information bank is a collection of personal information that is organized or searchable by the name of the individual or an identifying number, symbol or other identifier. A personal information bank can be a simple list of personal information. Personal information banks contain personal information that is:

- Linked to an identifiable individual
- Organized and capable of being retrieved by a personal identifier
- Normally compiled for a single purpose

25. Will your initiative result in a personal information bank?

Yes [   ]

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<mark>No</mark> [ ]

- If yes, please complete the table below.

Describe the type of information in the bank
Name of main organization involved
Any other ministries, agencies, public bodies or organizations involved
Business contact title and phone number for person responsible for managing the Personal Information Bank

PART 8: ADDITIONAL RISKS

Part 8 asks that you reflect on the risks to personal information in your initiative and list any risks that have not already been addressed by the questions in the template.

26. Risk response

Describe any additional risks that arise from collecting, using, storing, accessing or disclosing personal information in your initiative that have not been addressed by the questions on the template.

RISK	MITIGATION STRATEGY	LIKELIHOOD	IMPACT

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No additional risks were identified by the student or faculty supervisor.

PART 9: SIGNATURES

You have completed a PIA. Submit the PIA to your Privacy Officer for review and comment, and then have the PIA signed by those responsible for the initiative.

Privacy Office Comments

Once the PIA has been approved with or without conditions, the Privacy Officer will collect signatures from the individuals provided below. A copy of the PIA will be distributed to all signatories for convenience or to attach to a requisition or file with a contract.

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PIA Determination and Template

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Name of Individual leading the Program/Project: <u>Leah Chambers</u>

I confirm the information management practices in this initiative have been documented on Form A, and B as applicable, as accurately as I am aware and I commit to communicating appropriate information management practices to all individuals participating in this initiative as appropriate. I commit to following the documented practices on this PIA, or arranging a PIA amendment if I am aware information management practices in this initiative change.

Signature: _____ Date: November 7, 2022

Director or Dean Overseeing the Program/Project: <u>Dr. William J. Owen</u>

I am accountable for overseeing my staff involved in this initiative to ensure they adhere to information management practices presented in this PIA. I will arrange for the project lead named above to contact the Privacy Officer to arrange a PIA amendment if required.

Signature: _____ Date: November 8, 2022

Chief Information Security Officer: _____ Dave Kubert _____

Signature: _____ Date: Nov. 08, 2022

Privacy Officer – Senior Governance Officer: ___Kellie Howitt_____

I confirm that this initiative to the best of my knowledge as written in Form A, and B as applicable, has information management practices that comply with British Columbia's Freedom of Information and Protection of Privacy Act.

Signature: _____ Date: November 10, 2022

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