

Anonymisation: theory and practice

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Outline

- What is anonymisation?
- The anonymisation decision making framework

What is Anonymisation?

Anonymisation is a **process** by which personal data are rendered non-personal.

DPA definition of personal data

- Data which relate to a *living individual* who can be identified:
 - From those data, or
 - From those data and other information which is in the possession of, or is likely to come into the possession of, the data controller
- Other legislation and jurisdictions do not concern themselves with whether the individuals are living.

Anonymisation and de-identification

- Deal with different parts of the DPAs definition of personal data
- Deidentification tackles:
 - **“Directly from those data”**
- Anonymisation tackles:
 - **“Indirectly from those data and other information** which is in the in the possession of, or is likely to come into the possession of, the data controller...”

Anonymisation types

- Absolute Anonymisation
 - Zero possibility of re-identification under any circumstances
- Formal Anonymisation
 - De-identification (including pseudonymisation)
- Statistical Anonymisation
 - Statistical Disclosure Control
- Functional Anonymisation

Some principles

- Anonymisation is not about the data.
- Anonymisation is about **data situations**.
- Data situations arise from data interacting with data environments.

Data environment definition

The set of formal and informal structures, processes, mechanisms and agents that either:

- i. act on data;*
- ii. provide interpretable context for those data or*
- iii. define, control and/or interact with those data.*

Elliot and Mackey (2014)

Data environments in practice

- Consist of
 - Agents (people)
 - Infrastructure (particularly security)
 - Governance processes
 - Other data
- Layered
- Partitioned

Some principles

- Anonymisation is not about the data.
- Anonymisation is about **data situations**.
- Data situations arise from data interacting with data environments.
- *You cannot decide whether data are safe to share /release or not by looking at the data alone*

Some principles

- *Anonymisation is a process to produce safe data but it only makes sense if what you are producing is safe useful data.*

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- *Zero risk is not a realistic possibility if you are to produce useful data.*

Some principles

- Anonymisation is a process to produce safe data but it only makes sense if what you are producing is safe *useful* data.
- Zero risk is not a realistic possibility if you are to produce useful data.
- *The measures you put in place to manage risk should be proportional to that risk and its likely impact.*