What is the difference between patient identifiable, pseudonymised and anonymised data?

"Spectrum of Identifiability: Neil R Lawrence, and Stephen H Bradley Future Healthc J 2018;5:229-230"

PERSONAL DATA: Any information relating to an identified or identifiable natural person ('data subject') also referred as "Patient Identifiable" data. Refer here for more information:
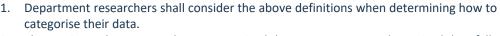What is personal data?

PSEUDONYMISED DATA: Data, which has undergone pseudonymisation, and can no longer be attributed to a data subject without the use of additional information. Researchers must secure that additional information separately, and confirm that appropriate technical and organisational controls are in place to prevent re-identification of an individual.
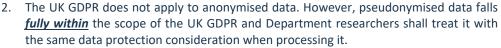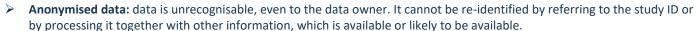
ANONYMISED DATA: The UK GDPR refers to 'Anonymous information'; information that does not relate to an individual, and is therefore is no longer 'personal data' and is not subject to the obligations of the UK GDPR. In order to determine whether data is anonymised, Department researchers shall take into account all the means reasonably likely to be used by a third party to directly or indirectly identify an individual.

Important Points to Consider

1. Department researchers shall consider the above definitions when determining how to categorise their data.
2. The UK GDPR does not apply to anonymised data. However, pseudonymised data falls *fully within* the scope of the UK GDPR and Department researchers shall treat it with the same data protection consideration when processing it.
   - ✓ **For example:** In the situation where a researcher has removed all identifiers from a clinical trial data set: the UK GDPR would *only* considered this data as anonymised if it was impossible to re-identify the trial subjects, even when cross-referenced against supporting documentation.
3. Another way of clarifying the difference between anonymised and pseudonymised data is as follows:

➢ **Anonymised data:** data is unrecognisable, even to the data owner. It cannot be re-identified by referring to the study ID or by processing it together with other information, which is available or likely to be available.
➢ **Pseudonymised data:** identifiable data has been replaced with alternative identifiers that bear no overt relationship to the true values. Re-identification of data can only be achieved with knowledge of the de-identification key.

If a Department researcher is uncertain whether a data set is anonymised or pseudonymised, the researcher should treat it as identifiable data in accordance with the Department's **IG107 Data Management Policy** and then consult the IG Team (datasecurity@phc.ox.ac.uk) for further assistance.

If any Department Member has any questions or concerns about the category of a data set, please contact the Information Governance Manager at the above email address and/or access these links:
1. ICO Data Sharing Code of Practice
2. Personal Data Anonymisation and Pseudonymisation Under GDPR
3. MHR Guidance: identifiability, anonymisation and pseudonymisation

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