**DEFINITIONS RELEVANT TO PSEUDONYMISATION WORKSHOP**

| **Term** | **Source** | **Description** |
| --- | --- | --- |
| Anonymised information | [ICO](https://www.ico.org.uk/Global/~/media/documents/library/Data_Protection/Detailed_specialist_guides/data_sharing_code_of_practice.ashx)[Anonymisation](https://www.ico.org.uk/Global/~/media/documents/library/Data_Protection/Detailed_specialist_guides/data_sharing_code_of_practice.ashx)[Code of Practice](https://www.ico.org.uk/Global/~/media/documents/library/Data_Protection/Detailed_specialist_guides/data_sharing_code_of_practice.ashx) page 49 | Information from which no individual can be identified |
| Anonymised data | [ICO code of practice 2012](http://www.ico.org.uk/news/latest_news/2012/~/media/documents/library/Data_Protection/Practical_application/anonymisation-codev2.pdf)page 48 | Data in a form that does not identify individuals and where identification through its combination with other data is not likely to take place |
| Anonymisation | [Caldicott2](http://www.hscic.gov.uk/media/12823/Confidentiality-guide-References/pdf/confidentiality-guide-references.pdf) guide references page 46 | The process of rendering data into a form which does not identify individuals and where there is little or no risk of identification (identification is not likely to take place) |
| Data controller | [Section 1 of the DPA](http://www.ico.org.uk/for_organisations/data_protection/the_guide/key_definitions)  | A person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed; |
| Data processor | [Section 1 of the](http://www.ico.org.uk/for_organisations/data_protection/the_guide/key_definitions)[DPA](http://www.ico.org.uk/for_organisations/data_protection/the_guide/key_definitions) [Caldicott2](http://www.hscic.gov.uk/media/12823/Confidentiality-guide-References/pdf/confidentiality-guide-references.pdf) guide references | In relation to personal data, any person (other than an employee of the data controller) who processes the data on behalf of the data controller;Caldicott2 states “the Information Commissioner recommends that organisations should choose data processors carefully and have in place effective means of monitoring, reviewing and auditing their processing and a written contract (detailing the information governance requirements) must be in place to ensure compliance with principle 7 of the Data Protection Act” |
| Data processing | [Section 1 of the](http://www.ico.org.uk/for_organisations/data_protection/the_guide/key_definitions)[DPA](http://www.ico.org.uk/for_organisations/data_protection/the_guide/key_definitions) Reproduced in [Caldicott2](http://www.hscic.gov.uk/media/12823/Confidentiality-guide-References/pdf/confidentiality-guide-references.pdf) guide references page 49 | Processing in relation to information or data, means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including:• organisation, adaptation or alteration of the information or data;• retrieval, consultation or use of the information or data;• disclosure of the information or data by transmission, dissemination or otherwise making available; or• alignment, combination, blocking, erasure or destruction of the information or data. |
| Patient identifier | [Caldicott2](http://www.hscic.gov.uk/media/12823/Confidentiality-guide-References/pdf/confidentiality-guide-references.pdf) guide references page 47 | An item of data, which by itself or in combination with other identifiers enables an individual to be identified. See appendix for examples  |
| Patient information (Statutory definition) | [Section 251 of the NHS Act 2006](http://www.legislation.gov.uk/ukpga/2006/41/contents) | Patient information is information (however recorded) which relates to the physical or mental health or condition of an individual, to the diagnosis of his condition or to his care or treatment, and information (however recorded) which is to any extent derived, directly or indirectly, from such information, whether or not the identity of the individual in question is ascertainable from the information. |
| Confidential patient information (Statutory definition) | [Section 251 of the NHS Act 2006](http://www.legislation.gov.uk/ukpga/2006/41/contents)   | Confidential patient information is patient information where the identity of the individual in question is ascertainable from that information, or from that information and other information which is in the possession of, or is likely to come into the possession of, the person processing that information, and that information was obtained or generated by a person who, in the circumstances, owed an obligation of confidence to that individual. |
| Personal data  | [Section 1 of the DPA](http://www.ico.org.uk/for_organisations/data_protection/the_guide/key_definitions)reproduced by [Caldicott2](http://www.hscic.gov.uk/media/12823/Confidentiality-guide-References/pdf/confidentiality-guide-references.pdf) guide references page 49 | 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, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual. |
| Personal confidential data | [Caldicott2](http://www.hscic.gov.uk/media/12823/Confidentiality-guide-References/pdf/confidentiality-guide-references.pdf) guide references page 49 | describes personal information about identified or identifiable individuals, which should be kept private or secret. For the purposes of this review ‘Personal’ includes the DPA definition of personal data, but it is adapted to include dead as well as living people and ‘confidential’ includes both information ‘given in confidence’ and ‘that which is owed a duty of confidence’ and is adapted to include ‘sensitive’ as defined in the Data Protection Act. |
| Pseudonym | [Caldicott2](http://www.hscic.gov.uk/media/12823/Confidentiality-guide-References/pdf/confidentiality-guide-references.pdf) guide references page 49 | Individuals are distinguished in a data set by using a unique identifier, which does not reveal their ‘real world’ identity  |
| Pseudonymisation definition 1 | [ICO code of practice 2012](http://www.ico.org.uk/news/latest_news/2012/~/media/documents/library/Data_Protection/Practical_application/anonymisation-codev2.pdf) page 49also reproduced in [Caldicott2 main report](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/192572/2900774_InfoGovernance_accv2.pdf)page 13 | The process of distinguishing individuals in a dataset by using a unique identifier which does not reveal their ‘real world’ identity |
| Pseudonymisation definition 2 | [Anonymisation for publishing health and social care data ISB 1523](http://www.isb.nhs.uk/documents/isb-1523/amd-20-2010/1523202010guid.pdf)Page 12 | technique that replaces identifiers with a pseudonym that uniquely identifies a person which is typically combined with other anonymisation techniques. It can be reversible or irreversible |
| Pseudonymised data | [Caldicott2 main report](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/192572/2900774_InfoGovernance_accv2.pdf) | Pseudonymised data are data in which individuals are distinguished “by using a unique identifier, which does not reveal their ‘real world’ identity” (i.e., a pseudonym). Data that have been adequately pseudonymised equate to anonymised data in the hands of a recipient; however, they usually can be re-identified by the original holder of the data. |
| Pseudonymisation at source | [Caldicott2 main report](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/192572/2900774_InfoGovernance_accv2.pdf)Page 66 | Pseudonymisation at source is a process that replaces identifiers in a data set with a coded reference or pseudonym so information about an individual can be distinguished without their ‘real-life’ identity being revealed. If the process of pseudonymisation is ‘enterprise wide’, meaning it is standard across the whole health and social care system, it is then possible for it to be safely linked with another data set and the identity of the individual protected. |
| De-identified | [Caldicott2](http://www.hscic.gov.uk/media/12823/Confidentiality-guide-References/pdf/confidentiality-guide-references.pdf) guide references p47 | Information which identifies an individual has been removed, but there is still some risk of re-identification |
| De-identification | Need to identify authorative source or ? remove this | De-identification is the process of removing identifiers. The process includes techniques such aggregating data to counts, removal of identifiers and conversion of identifiers to pseudonyms. |
| De-identified data including DEIDLA | [Caldicott2 main report](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/192572/2900774_InfoGovernance_accv2.pdf) page 127  | De-identified data: This refers to personal confidential data, which has been through anonymisation in a manner conforming to the ICO Anonymisation code of practice. There are two categories of de-identified data:• De-identified data for limited access: this is deemed to have a high risk of re-identification if published, but a low risk if held in an accredited safe haven and subject to contractual protection to prevent re-identification.• Anonymised data for publication: this is deemed to have a low risk of re-identification, enabling publication. |
| Re-identification | [Caldicott2](http://www.hscic.gov.uk/media/12823/Confidentiality-guide-References/pdf/confidentiality-guide-references.pdf) guide references page 49 | The process of analysing data or combining it with other data with the result that individuals become identifiable. Also known as ‘de-anonymisation |
| Sensitive personal data/information | [Section 2 of the DPA](http://www.legislation.gov.uk/ukpga/1998/29/section/2) Reproduced in[Caldicott2](http://www.hscic.gov.uk/media/12823/Confidentiality-guide-References/pdf/confidentiality-guide-references.pdf) guide references page 49 | Data that identifies a living individual consisting of information as to his or her: racial or ethnic origin, political opinions, religious beliefs or other beliefs of a similar nature, membership of a trade union, physical or mental health or condition, sexual life, convictions, legal proceedings against the individual or allegations of offences committed by the individual |

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##

**Definition of Personal Identifier**

***Identifier:*** *An item of data, which by itself or in combination with other identifiers enables an individual to be identified. Examples include:*

*1.         Names.*

*2.         All geographic subdivisions smaller than a state, including street address, city, county, precinct, postcode, and their equivalent geographical codes, except for the initial four digits of a postcode if, according to the current publicly available data from the Office for National Statistics and/or the Information Commissioner’s Office:*

*a.         The geographic unit formed by combining all postcodes with the*

*same four initial digits contains more than 20,000 people.*

*b.         The initial three digits of a postcode for all such geographic*

*units containing 20,000 or fewer people are changed to 000.*

*3.         All elements of dates (except year) for dates directly related to an individual, including birth date, admission date, discharge date, date of death; and all ages over 89 and all elements of dates (including year) indicative of such age, except that such ages and elements may be aggregated into a single category of age 90 or older.*

*4.         Telephone numbers.*

*5.         Facsimile numbers.*

*6.         Electronic mail addresses.*

*7.         National Insurance numbers.*

*8.         NHS number and medical record numbers.*

*9.         Health plan beneficiary numbers.*

*10.       Account numbers.*

*11.       Certificate/licence numbers.*

*12.       Vehicle identifiers and serial numbers, including licence plate numbers.*

*13.       Device identifiers and serial numbers.*

*14.       Web universal resource locators (URLs).*

*15.       Internet protocol (IP) address numbers.*

*16.       Biometric identifiers, including fingerprints and voiceprints.*

*17.       Full-face photographic images and any comparable images.*

*18.       Any other unique identifying number, characteristic, or code, unless otherwise permitted by the Information Commissioner’s Office.*

‘A guide to confidentiality in health and social care’ [url: <http://www.hscic.gov.uk/media/12823/Confidentiality-guide-References/pdf/confidentiality-guide-references.pdf>., p.48