

Working Title: The anonymisation decision-making framework

Authors: Elliot, Mackey & O'Hara

Abstract

This paper describes the *anonymisation decision making framework*, a new holistic approach to anonymisation that provides an end to end methodology for assessment of risk and control of re-identification which incorporates legal, ethical, policy and statistical insights. The framework has been developed in the context of the current UK regulatory environment (primarily the Data Protection Act 1998) and here we also consider its value in interpreting the General Data Protection Regulation. We raise questions of whether the framework is entirely compatible with the GDPR definitions of 'personal data', and 'pseudonymisation' and the relationship between the framework and the core implementation principle of the regulation: *data protection by design*.