



[REDACTED]

24 November 2021

Dear [REDACTED],

Freedom of Information request: FOI2021/00481

Thank you for your Freedom of Information request received on the 29 October and clarification on 5 and 9 November, in which you requested the following:

Your request:

I'm writing to find out whether UKRI has a position on anonymisation and research – how anonymisation and pseudonymisation apply in a research delivery context for MRC and ESRC. We would be interested in any position papers or policies that you may have, if you're able to share these.

Our response:

I can confirm UK Research and Innovation (UKRI) hold some information relevant to your request. Please see the information below.

UKRI has no formal position on how researchers implement anonymisation and pseudonymisation in their research delivery, however there are a number of documents available for both MRC and ESRC that offer guidance relating to the subject.

Under Section 21, of the FOIA, information already reasonably accessible, these documents are already available in the public domain:

The MRC's Regulatory Support Centre (RSC) has produced [guidance on Identifiability, anonymisation and pseudonymisation](#)¹ with the participation of the Information Commissioner's Office (ICO) and the [MRC ethics series: using information about people in health research](#)² has a section (chapter 5) on anonymisation and pseudonymisation.

Both of these documents were produced by the MRC RSC, who would be best placed to answer any further questions on these or anything else to do with identifiability, anonymisation and pseudonymisation in research. They can be contacted at rsc@mrc.ukri.org.

In addition, there are also references to anonymising data in the MRC's [Policy and Guidance on Sharing of Research Data from Population and Patient Studies](#)³. However, please note that this guidance is currently under review, including section 8 on data preparation and transfer, where some of the information does not reflect current legislation and guidance.

¹ <https://mrc.ukri.org/documents/pdf/gdpr-guidance-note-5-identifiability-anonymisation-and-pseudonymisation/>

² <https://www.ukri.org/wp-content/uploads/2021/08/MRC-0208212-Using-information-about-people-in-health-research-2018.pdf#page=17>

³ <https://www.ukri.org/wp-content/uploads/2021/08/MRC-0208212-MRC-policy-and-guidance-on-sharing-of-research-data-from-population-and-patient-studies-Word-version-v01.02.pdf>

[ESRC's Research ethics guidance](#)⁴ outlines data requirements and further information is available on the [research data management pages](#)⁵ of the ESRC funded UK Data Service. ESRC's Administrative Data Research UK (ADR UK) investment also has a [section on ethics and responsibility](#)⁶ which covers how data privacy is protected.

Section 21 is an absolute exemption which means that there is no requirement to conduct a public interest test.

It may also be worth noting that the ICO are currently running an open consultation for views on [anonymisation, pseudonymisation and privacy enhancing technologies guidance](#)⁷ which both UKRI and ADR UK will respond to after the consultation closes at the end of this month. The response from ADR UK, once available, will be published [here](#)⁸.

If you have any queries regarding our response or you are unhappy with the outcome of your request and wish to seek an internal review of the decision, please contact:

Head of Information Governance


Email: foi@ukri.org or infogovernance@ukri.org

Please quote the reference number above in any future communications.

If you are still not content with the outcome of the internal review, you may apply to refer the matter to the Information Commissioner for a decision. Generally, the ICO cannot make a decision unless you have exhausted the review procedure provided by UKRI. The Information Commissioner can be contacted at: <http://www.ico.gov.uk/>

If you wish to raise a complaint regarding the service you have received or the conduct of any UKRI staff in relation to your request, please see UKRI's complaints policy: <https://www.ukri.org/about-us/policies-and-standards/complaints-policy/>

Yours sincerely,


Information Governance
Information Rights Team
UK Research and Innovation
foi@ukri.org | dataprotection@ukri.org

⁴ <https://www.ukri.org/councils/esrc/guidance-for-applicants/research-ethics-guidance/>

⁵ <https://ukdataservice.ac.uk/learning-hub/research-data-management/>

⁶ <https://www.adruk.org/our-mission/ethics-responsibility/>

⁷ <https://ico.org.uk/about-the-ico/ico-and-stakeholder-consultations/ico-call-for-views-anonymisation-pseudonymisation-and-privacy-enhancing-technologies-guidance/>

⁸ <https://www.adruk.org/news-publications/publications-reports/consultation-responses/>