



GPA Global Privacy and Data Protection Awards 2025

Entry Form

To submit an entry to the GPA Global Privacy and Data Protection Awards, please complete and email this form to secretariat@globalprivacyassembly.org **no later than 16 June 2025**.

Note: GPA member authorities can submit as many entries as they wish, but a separate form should be used for each different entry, submitted by the deadline above.

Languages: The GPA documentation Rule 6.2¹ applies.

1. CONTACT DETAILS FOR THIS ENTRY

Privacy/Data Protection Authority:	Information Commissioner's Office	
Person completing this form:	Paul	Comerford
Job title:	First name	Last name
	Principal Technology Adviser (Technology)	
Email address:	paul.comerford@ico.org.uk / gpa@ico.org.uk (Please use both email addresses in all correspondence with the ICO)	

2. ELIGIBILITY

By submitting this entry, I confirm that (*please tick all boxes to confirm*):

- ☒ The Authority is a member of the Global Privacy Assembly
- ☒ The initiative described in this entry was undertaken before 16 June 2025.
- ☒ I am aware that the information in the entry (other than the contact details in 1(a) above) will be publicised by the GPA Secretariat.

3. CATEGORIES

Please indicate which category you wish to enter.

*Please tick **one**; please use a separate form for each category you wish to enter:*

- ☐ Education and Public Awareness
- ☒ Accountability
- ☐ Dispute Resolution and Enforcement
- ☐ Innovation
- ☐ People's Choice

¹ [GPA Rules and Procedures](#), Rule 6.2 'Assembly documents':

Without prejudice to section 4.2, Assembly documents, including accreditation and observer applications may be submitted in English or in another language. In the latter case, the documents shall be accompanied by an English version. Members with the ability and the resources to do so are encouraged to translate proposed resolutions and other Assembly documents such as the Assembly Rules and Procedures.

4. DESCRIPTION OF THE INITIATIVE

a. Please provide a brief summary of the initiative (no more than 75 words)

The ICO's *Anonymisation and Pseudonymisation Guidance* provides guidance on how organisations can effectively anonymise and pseudonymise personal data to comply with UK data protection law. It covers key concepts, legal definitions, risk assessments (like the "motivated intruder" test), and practical techniques. The guidance also outlines governance responsibilities, benefits of anonymisation, and how to manage identifiability risks when sharing or processing anonymised or pseudonymised data.

b. Please provide a full description of the initiative (no more than 350 words)

The ICO's *Anonymisation and Pseudonymisation Guidance* provides detailed data protection advice for organisations on how to carry out anonymisation and pseudonymisation in compliance with UK data protection law.

The guidance defines anonymisation as the process of removing personal identifiers so individuals can no longer be identified, directly or indirectly. It distinguishes this from pseudonymisation, where identifiers are replaced but the data can still be re-linked to individuals with additional information, kept separately. While anonymised data falls outside data protection law, pseudonymised data remains within its scope.

Key topics covered in the guidance include:

- how anonymisation and pseudonymisation applies across the UK GDPR and the Data Protection Act 2018, as well as other related legislation.
- how organisations must assess the likelihood of re-identification using the "motivated intruder" test, which considers whether an attacker could identify individuals using available resources and means reasonably likely to be used, considering cost, time to re-identify and the available technologies.
- how to choose appropriate anonymisation methods such as generalisation, aggregation, and differential privacy, and pseudonymisation techniques like tokenisation and encryption.
- providing guidance on the requirements for accountability, including assigning responsibility, maintaining documentation, and conducting regular reviews of anonymisation processes.
- providing guidance on sharing anonymised data safely with other parties, including working with third parties and ensuring transparency.

The guidance provides a risk-based, proportionate approach which can be applied to each organisation's context. It also supports public authorities in complying with related legislation like the Freedom of Information Act when releasing anonymised datasets.

The guidance also includes practical case studies that illustrate how organisations can apply the techniques discussed in real-world scenarios. These case studies were developed in collaboration with organisations that use anonymisation and pseudonymisation in innovative ways. While not prescriptive, these examples offer valuable insights into effective implementation.

c. Please explain why you think the initiative deserves to be recognised by an award
(no more than 200 words)

The ICO's guidance on Anonymisation and pseudonymisation exemplifies how data protection authorities can operationalise accountability and embed it into organisational practice. This guidance provides practical steps for organisations to build robust internal frameworks to support lawful, transparent, and well-evidenced use of anonymised or pseudonymised data.

It encourages organisations to treat anonymisation as a risk management process, with clear roles and responsibilities, senior oversight, and formalised review mechanisms. The guidance highlights the importance of Data Protection Impact Assessments (DPIAs), internal audit trails, and staff training—ensuring that anonymisation decisions are documented, repeatable, and auditable.

This proactive approach aligns with the spirit of accountability found across global data protection frameworks: not merely to comply with the law, but to demonstrate that compliance is embedded in governance structures. By moving accountability from theory into practice, the guidance provides a model for regulators worldwide.

Through this initiative, the ICO has advanced the global understanding of how anonymisation can be governed effectively, responsibly, and transparently—making it a compelling candidate for recognition under the GPA Award's Accountability category.

d. Please include a photograph or image, if you wish *(This will be published with your entry on the GPA website. The image can be pasted into the box below, be sent as an attachment or a link may be provided)*

Anonymisation

Contents

- [About this guidance](#)

- Why have you produced this guidance?
- What is this guidance about?
- Who is this guidance for?
- How is this guidance structured?

- [Introduction to anonymisation](#)

- What is personal data?
- What is anonymous information?
- What is anonymisation?
- Is anonymisation always necessary?
- Is anonymisation always possible?
- What are the benefits of anonymisation?
- If we anonymise personal data, does this count as processing?
- What is the difference between anonymisation and pseudonymisation?
- What about 'de-identified' personal data?

- [How do we ensure anonymisation is effective?](#)

- What should our anonymisation process achieve?
- What is identifiability?
- What are the key indicators of identifiability?
- What is the "spectrum of identifiability"?
- What does data protection law say about assessing identifiability risk?
- How should we approach this assessment?
- What factors should we include?
- Do we need to consider who else may be able to identify people from the data?
- Can we anonymise within our organisation?
- What is the "motivated intruder" test?
- How do we apply the motivated intruder test?
- When should we review our identifiability risk assessments?
- How do we decide when and how to release data?
- What approaches can we take to anonymisation?

- [Pseudonymisation](#)

- What is pseudonymisation?

28 March 2025 - 1.0.21

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Image 1: UK ICO's Anonymisation Guidance Table of Content

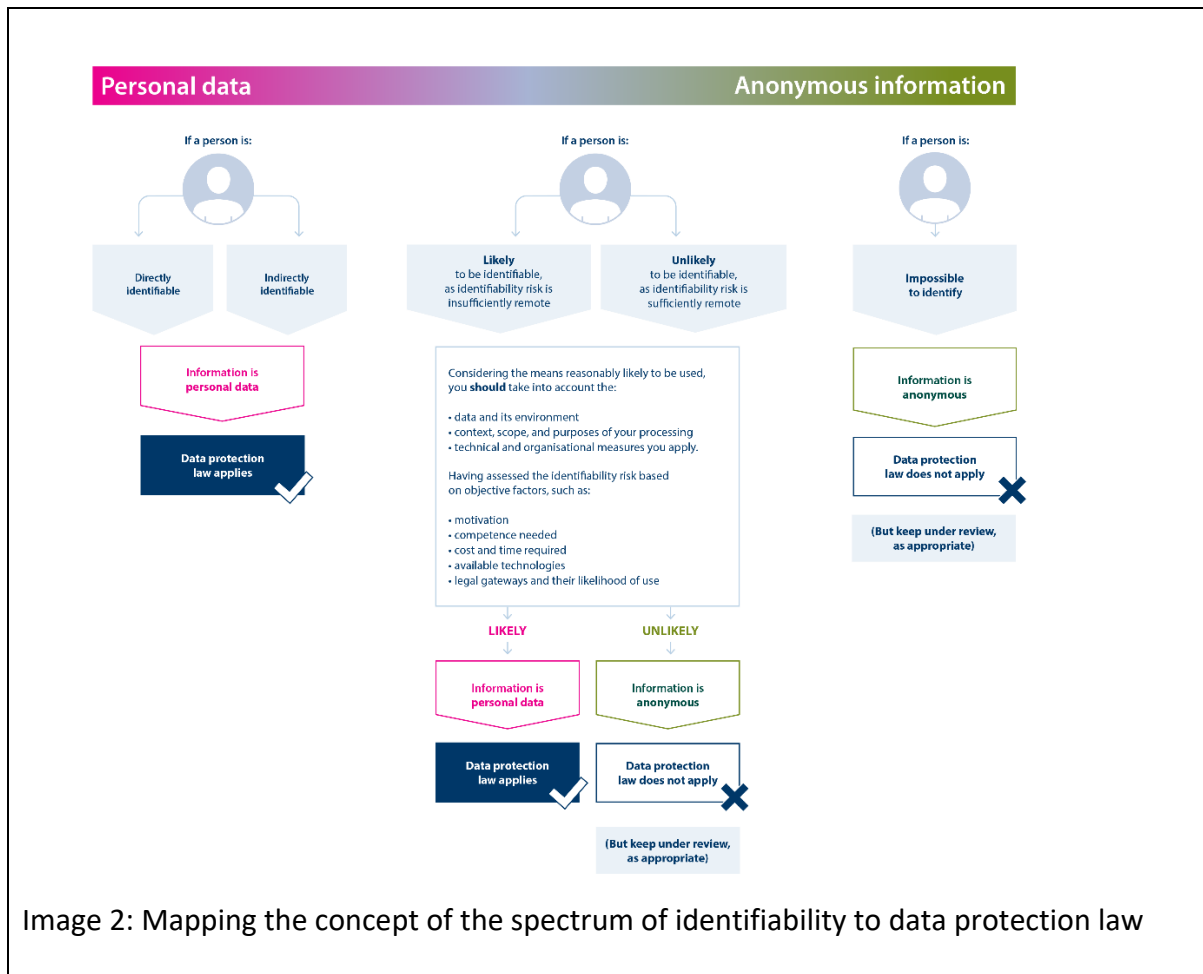


Image 2: Mapping the concept of the spectrum of identifiability to data protection law

e. Please provide the most relevant link on the authority's website to the initiative, if applicable (*The website content does not need to be in English*)

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/data-sharing/anonymisation/>

f. Please provide any other relevant links that help explain the initiative or its impact or success (*e.g. links to news reports or articles*):

The links below demonstrate the impact the guidance has had on industry to date:

<https://www.pinsentmasons.com/out-law/analysis/ico-anonymisation-guide-uk-data-protection-compliance>

<https://www.lexology.com/library/detail.aspx?g=9676d5ba-8331-4672-ac2d-84f6903627d0>

<https://www.vwv.co.uk/insights/articles/new-ico-guidance-clarifies-use-of-anonymisation-and-pseudonymisation/>

<https://aphaia.co.uk/icos-2025-anonymisation-guidance-turning-personal-data-into-a-privacy-asset/>

<https://www.lexisnexis.co.uk/legal/news/key-takeaways-from-the-icos-final-anonymisation-guidance>

<https://www.boyesturner.com/news-and-insights/data-anonymisation-icos-latest-compliance-guidance>

The ICO received positive responses from key UK stakeholders such as DHSC, NHSE, Understanding Patient Data, LGA, General Medical Council, Scottish Government AI policy team and our regional contacts. Our social media post also received a lot of stakeholder support, including from the National Guardian Health and Social Care who shared our anonymisation guidance with some positive comments and feedback on LinkedIn:

<https://www.linkedin.com/feed/update/urn:li:share:7316089658734452738/>.

We also aimed to raise awareness of the benefits of anonymising data which we measured through positive sentiment on social media. Our launch post on LinkedIn achieved 5 times our average engagement with 18,000 impressions, a 30% engagement rate and 107 shares, many of which included the following positive comments:

- "Useful overview webinar adding that additional layer of protection. Great insight for this area of DP - adding this 22 May webinar to my training schedule"
- "Fantastic new guidance from the ICO"
- "...this level of support from regulators can be a gamechanger"
- "An excellent guidance doc from the Information Commissioner's Office"
- "A must read for anyone in the field of Data Privacy and Protection"

On **22 May 2025**, the ICO hosted a [webinar supporting the launch of its Anonymisation and Pseudonymisation guidance](#). The webinar presented the guidance's key takeaways and the benefits of anonymising and pseudonymising data with Q&A opportunities for attendees. The webinar was attended by over 1500 people from 2200 registrations. The webinar was very well received by attendees, some sample feedback is provided below.

- "fantastic event, thank you ever so much for organising it and for providing such amazing guidance."
- "The presentation was really clear and the topic is always super interesting, thank you for developing the guidance and for this webinar!"
- "The presenter was knowledgeable and the slides were informative. A very useful webinar. Thank you."