



Life Sciences

Welcome to our Life Sciences newsletter!

The latest data protection developments affecting Life Sciences, with expert insights and advice from our specialist DPOs.

LIFE SCIENCES IN THE NEWS

ICO publishes draft guidance on anonymisation and pseudonymisation

On 24 August 2026, the UK's Information Commissioner's Office (ICO) published [draft guidance on the use of anonymisation and pseudonymisation](#) for Research, Archiving, and Statistical (RAS) purposes.

The guidance is particularly relevant to Life Sciences organisations, including sponsors, CROs and research institutions, carrying out or supporting UK-based research or clinical trials involving personal data. It sets out how anonymisation and pseudonymisation should be approached throughout the research lifecycle, including assessing identifiability, minimising personal data, and applying appropriate safeguards. The consultation is open until 19 October 2026.

What could this mean for Life Sciences?

Amy Saksena, Data Protection Officer at The DPO Centre, explains:

'For organisations processing personal data for RAS purposes, the ICO's draft guidance makes clear that anonymisation should be considered at the outset, not as an afterthought. Organisations should first consider whether anonymous information could meet their purpose. Where it cannot, they should use pseudonymisation at the earliest opportunity where appropriate.

'Identifiability should also be assessed in context. This includes considering who will hold or have access to the data (the 'whose hands' test) and whether a reasonably motivated person could re-identify individuals using information available to them (the 'motivated intruder' test).

Check your current approach

Key areas to consider include:

- Confirming controller, joint controller, or processor roles at each stage of the processing
- Documenting why anonymous information would not meet the purpose, and regularly reviewing safeguards as the data, users, technology, standards, and industry practices change
- Building in Privacy by Design and Default through practical safeguards, including privacy-enhancing technologies and the Five Safes Framework

- Taking extra care with higher-risk data where individuals may remain identifiable even after obvious identifiers have been removed
- Selecting a data release model proportionate to the risk, recognising that public release carries the greatest risk

'This is especially relevant where research involves sensitive or detailed datasets. Removing obvious identifiers may not be enough to make information anonymous. You also need to consider how distinctive the remaining data is, its intended use, who will have access to it, and what other information could enable individuals to be identified.'

INFORMATION, BLOGS & ARTICLES

ANONYMISATION PART 1: CHALLENGES & CONSIDERATIONS FOR **LIFE SCIENCES**

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