

# Rectifying Unlearning Efficacy and Privacy Evaluation: A New Inference Attack Perspective

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Track 3: ML and AI Privacy 2

# It's 2025: Has Unlearning Already Won?

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- ❑ A large and growing body of work has been introduced for **inexact selective unlearning**.
- ❑ Empirical evaluations indicate the subtle and incremental improvements in recent unlearning works.
- ❑ Did we solve unlearning?! or need to revisit empirical evaluation?!



a) Unlearning request

# It's 2025: Has Unlearning Already Won?

Failure of membership inference attack (MIA) → Better Forgetting [1]

Existing MIAs suggest that unlearning approximates **Retraining** (Gold standard)

**Table 3:** Performance of approximate unlearning methods (including both relabeling-free and relabeling-based methods) under random forget sets and worst-case forget sets on CIFAR-10 using ResNet-18 with forgetting ratio 10%. The result format follows Table 2. Additionally, a performance gap against **Retrain** is provided in (•). The metric *averaging (avg.) gap* is calculated by averaging the performance gaps measured in all metrics. Note that the better performance of an MU method corresponds to the smaller performance gap with Retrain.

Methods	UA	Random Forget Set				Avg. Gap	Worst-Case Forget Set				Avg. Gap
		UA	MIA	RA	TA		UA	MIA	RA	TA	
Retrain	5.28 <sub>±0.33</sub>	12.86 <sub>±0.61</sub>	100.00 <sub>±0.00</sub>	94.38 <sub>±0.15</sub>	0.00		0.00 <sub>±0.00</sub>	0.00 <sub>±0.00</sub>	100.00 <sub>±0.00</sub>	94.66 <sub>±0.09</sub>	0.00
<b>Relabeling-free</b>											
FT	5.08 <sub>±0.39</sub> (0.20)	10.96 <sub>±0.38</sub> (1.90)	97.40 <sub>±0.52</sub> (4.94)	91.02 <sub>±0.36</sub> (3.90)	2.00		0.00 <sub>±0.00</sub> (0.00)	0.02 <sub>±0.02</sub> (0.02)	97.63 <sub>±0.46</sub> (2.37)	91.58 <sub>±0.40</sub> (3.08)	1.37
EU-k	2.34 <sub>±0.79</sub> (2.94)	6.35 <sub>±0.89</sub> (6.51)	97.52 <sub>±0.89</sub> (2.48)	90.17 <sub>±0.88</sub> (4.21)	4.04		0.68 <sub>±0.36</sub> (0.68)	5.02 <sub>±4.42</sub> (5.02)	97.17 <sub>±0.86</sub> (2.83)	90.08 <sub>±0.70</sub> (4.58)	3.28
CF-k	0.02 <sub>±0.02</sub> (5.26)	0.76 <sub>±0.02</sub> (12.10)	99.98 <sub>±0.00</sub> (0.02)	94.45 <sub>±0.02</sub> (0.07)	4.36		0.00 <sub>±0.00</sub> (0.00)	0.00 <sub>±0.00</sub> (0.00)	99.98 <sub>±0.01</sub> (0.02)	94.34 <sub>±0.00</sub> (0.32)	0.08
SCRUB	12.42 <sub>±0.92</sub> (7.14)	22.63 <sub>±2.42</sub> (9.57)	88.33 <sub>±0.76</sub> (11.69)	83.15 <sub>±1.92</sub> (11.20)	9.91		0.03 <sub>±0.03</sub> (0.03)	0.04 <sub>±0.05</sub> (0.04)	98.95 <sub>±0.33</sub> (1.85)	92.75 <sub>±0.30</sub> (1.88)	0.82
$\ell_1$ -sparse	4.34 <sub>±0.73</sub> (0.94)								96.93 <sub>±0.73</sub> (3.07)	90.96 <sub>±0.82</sub> (3.70)	1.72

One-way MIA acc:  
low MIA accuracy  
gap < 3% with  
“retraining” on top  
unlearning [2].

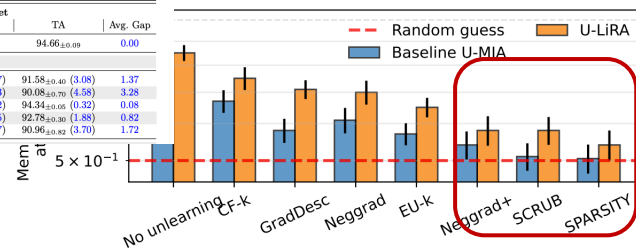
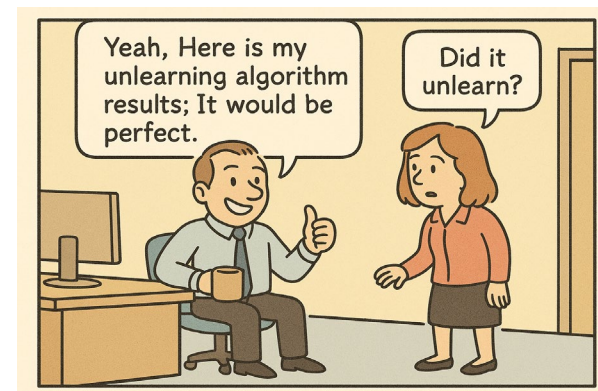


Figure 1 | Membership inference attack accuracy using a baseline attack and U-LiRA across different unlearning algorithms. Attack and unlearning algorithm descriptions are in Section 4. U-LiRA outperforms the baseline by a large margin across all unlearning algorithms because it creates per-example MIA decision rules.



b) Using a fast inexact unlearning

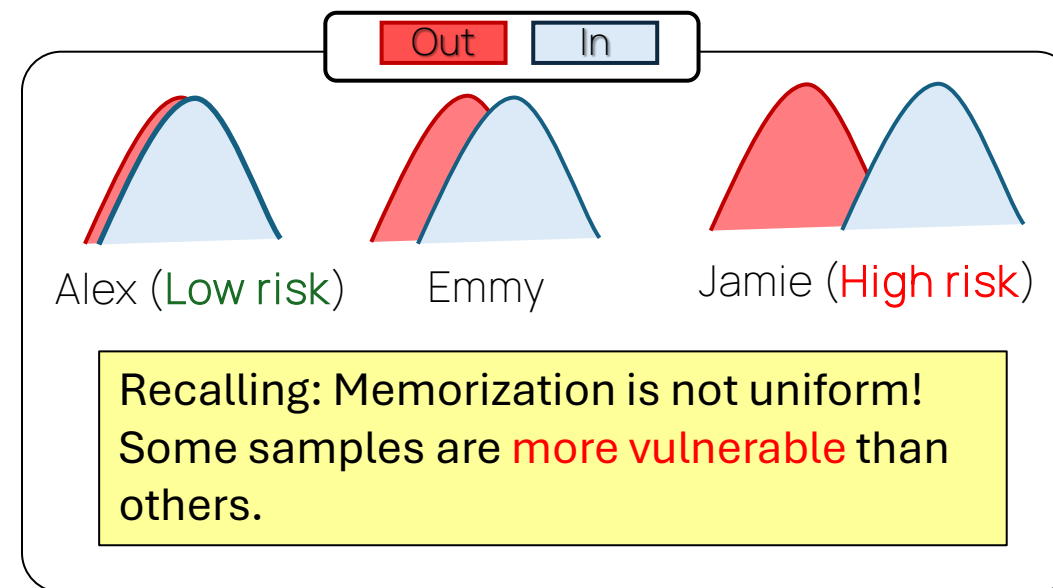
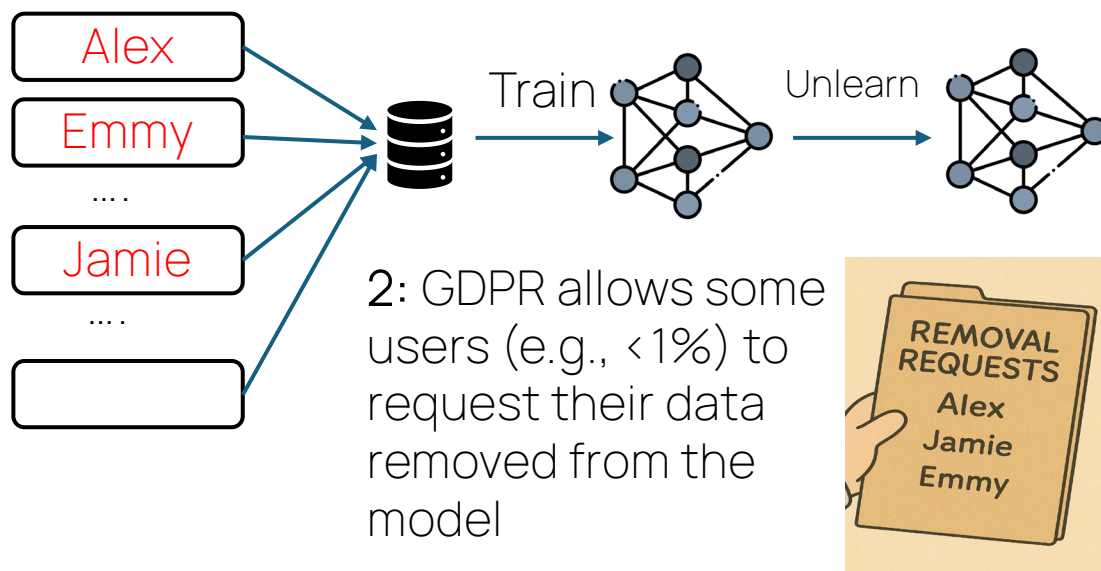
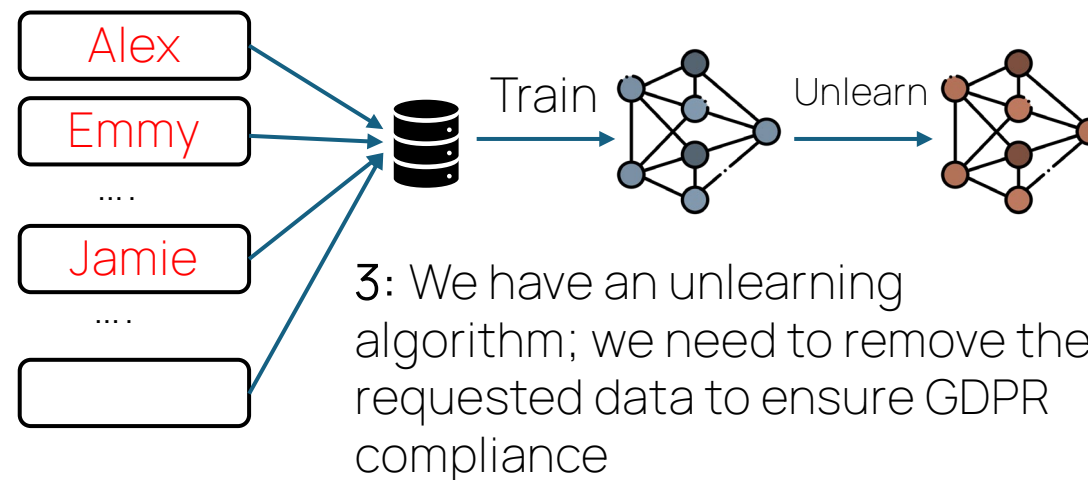
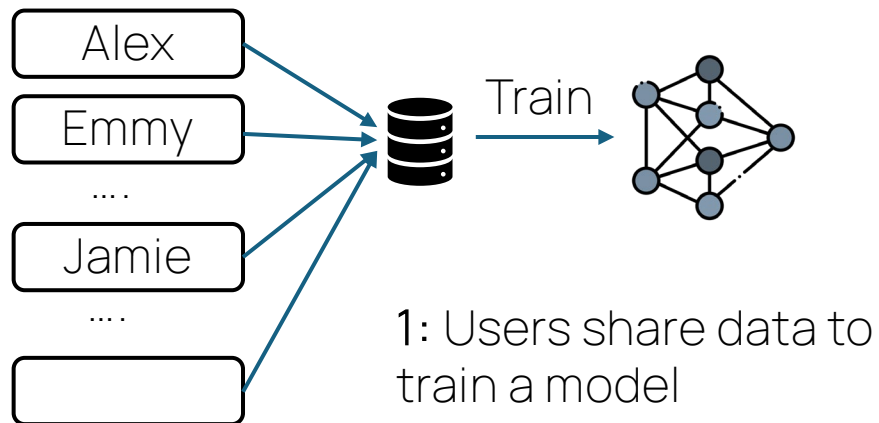
SOTA on privacy leakage:  
MIA accuracy gap < 10%  
on top unlearning [3].

[1] Jagielski, Matthew, et al. "Measuring forgetting of memorized training examples." In ICLR 2023.

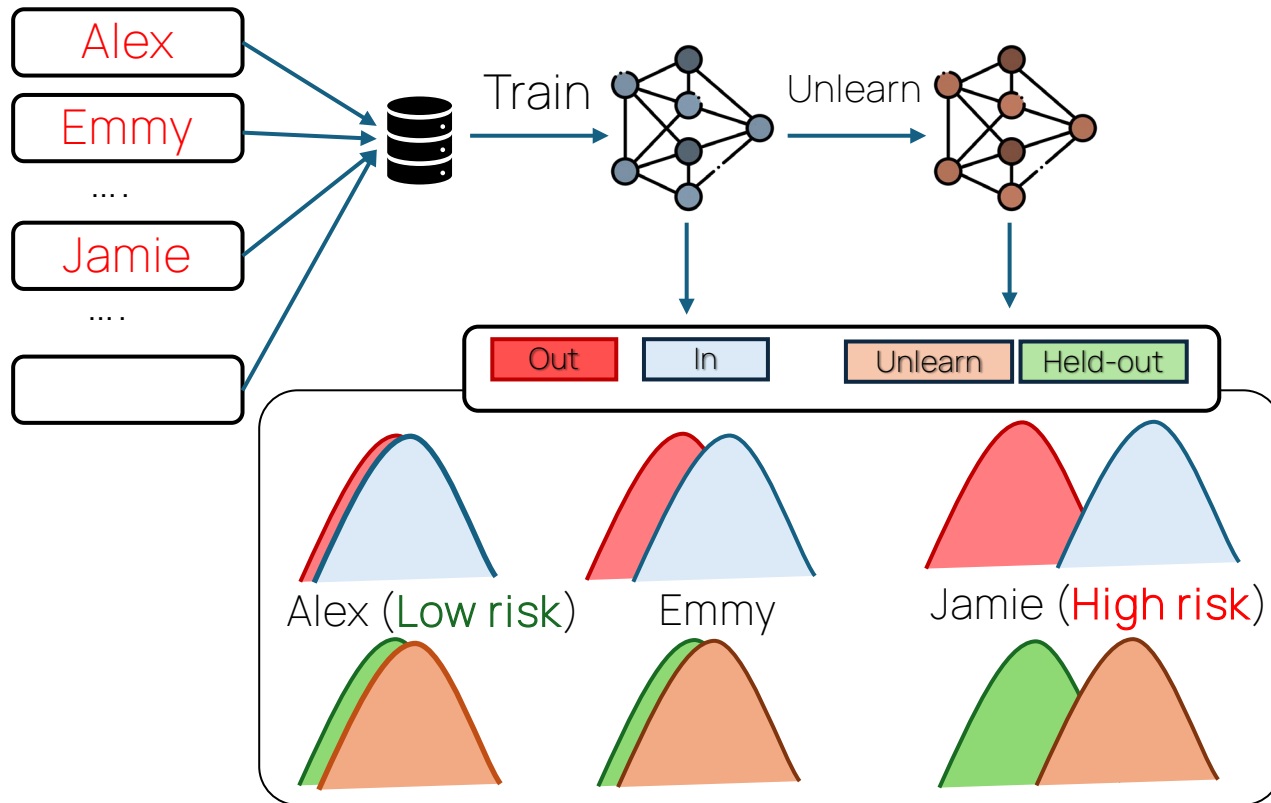
[2] Fan, Chongyu, et al. "Challenging forgets: Unveiling the worst-case forget sets in machine unlearning." In ECCV 2024.

[3] Hayes, Jamie, et al. "Inexact unlearning needs more careful evaluations to avoid a false sense of privacy." In SaTML 2025.

# Warm-up: Our Motivation



# Threat Model and Definitions



Threat Model: *adversary only has access to the final unlearned model*

**In:** distribution of trained models where a sample is *member*

**Out:** distribution of trained models where sample is *non-member*

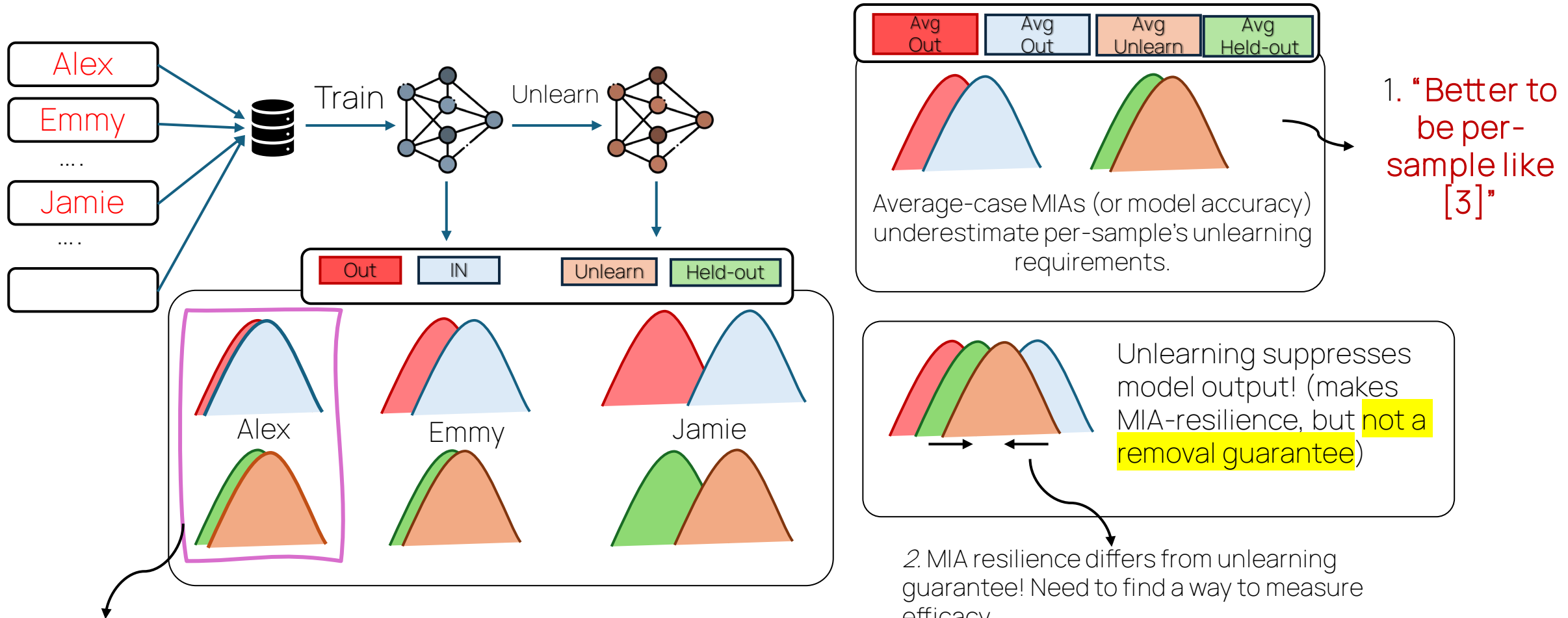
**Unlearn:** distribution of unlearned models where a sample is *unlearned*

**Held-out:** distribution of unlearned models where sample is *non-member*

If  $Unlearn \approx Held-out$ , privacy is preserved.  
**"Privacy"**

If  $Unlearn \approx Out$ , unlearning is effective.  
**"Efficacy"** (Indistinguishability to Retraining)

# What is missing today



3. Many samples are like this; well-protected already.  
"Let's do not evaluate them"

Efficacy: "MIA to identify if any sample is unlearned or retrained"

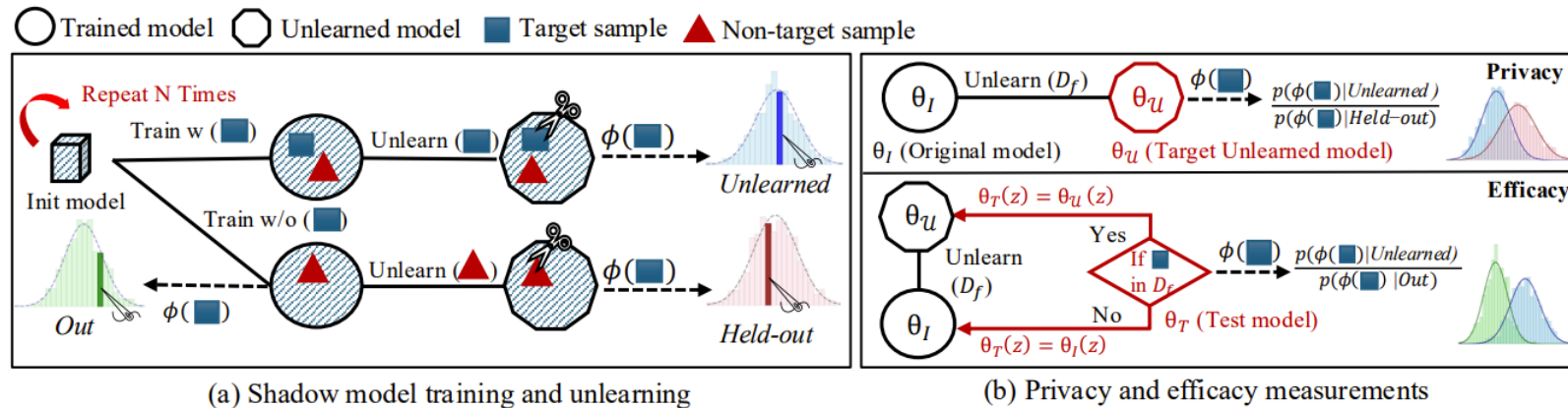
# Rectified Unlearning Evaluation Framework via Likelihood Inference (RULI)

1. We introduced an algorithm to train shadow models; got all distributions required per-sample

*We optimized our algorithm's parallelization to reduce shadow-model costs.*

2. We introduced a hypothetical *Test model* to measure Efficacy;

*This calibrates output suppression impact.*

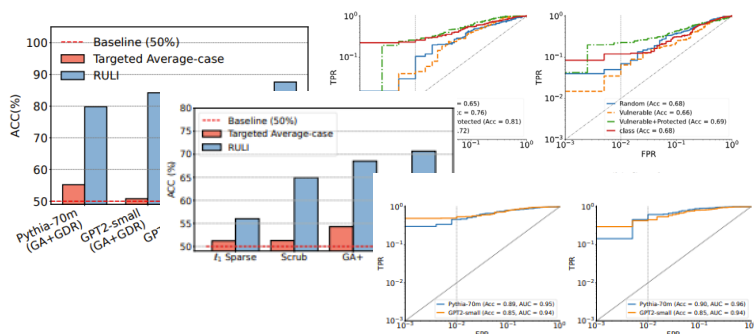


3. We targeted vulnerable sample and inject them as **canaries** to challenge/evaluate unlearning.



# Our Results

- ❑ We assume we can always find the **best unlearning parameters** per unlearning request.
- ❑ Canary injection usually **leaks** more than purely unlearning vulnerable samples!
- ❑ We also tried similar experiments on CIFAR-10, CIFAR-100, and 7-gram unlearning from WikiText-103.



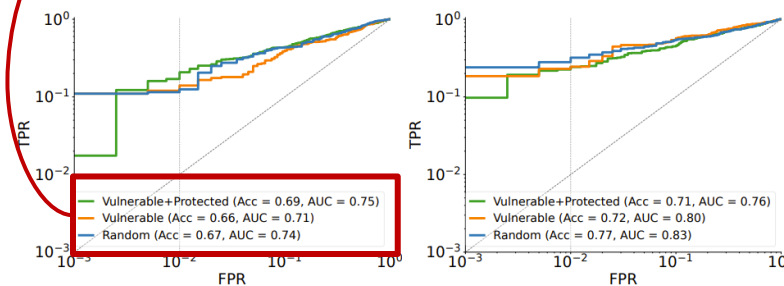
Target data	Targeted average-case attack (Population attack)				RULI			
	AUC	ACC	TPR@ 1%FPR	TPR@ 5%FPR	AUC	ACC	TPR@ 1% FPR	TPR@ 5%FPR
<b><math>\ell_1</math> Sparse</b>								
Vulnerable only	54.4%	55.1%	2.3%	5.2%	59.6%	56.0%	2.4%	12.4%
Vulnerable as canaries	55.3%	54.7%	0.8%	5.6%	<b>62.6%</b>	<b>57.0%</b>	<b>6.3%</b>	<b>16.6%</b>
Random	53.2%	52.8%	0.0%	2.4%	56%	54.4%	0.8%	6.4%
<b>Scrub</b>								
Vulnerable only	52.5%	52.4%	2.0%	5.4%	65.3%	61.5%	11.7%	23.9%
Vulnerable as canaries	56.0%	56.2%	1.0%	6.3%	<b>69.5%</b>	<b>63.6%</b>	<b>10.9%</b>	<b>27.1%</b>
Random	49.6%	49.8%	1.0%	2.8%	59.7%	57.0%	6.0%	14.0%

~12.6% higher  
MIA success  
6.3x higher  
privacy risk  
than  
retraining

~19.5% higher  
MIA success;  
10.9x privacy  
risk than  
retraining

*Tiny ImageNet unlearning; swin-small model;  
unlearning < 1% of the data.  
500 samples: 250 Out and 250 Unlearned*

Up to 69% MIA success  
distinguishing  
unlearned vs retrained



(a)  $\ell_1$  Sparse

(b) Scrub

This is one example; further results are in the paper.



Thanks for your attention!

More details about our design and validations?

**Let's discuss this more in the following poster session**

Or contact us via email: [nima.naderloui@uconn.edu](mailto:nima.naderloui@uconn.edu)

Code available on: <https://github.com/datasec-lab/Ruli>

