



## DIVERSITY DATA POLICY

### Introduction

1. This is the Data Diversity Policy for 1 Chancery Lane (“Chambers”) which is established in accordance with paragraphs 408.2 (k) - (u) of the Bar Standard Board Code. This policy is effective as of 1 October 2012.
2. The registered data controller for Chambers is the Head of Chambers, John Ross Q.C., whose number on the Data Protection register is Z2948981.
3. Chambers’ Diversity Data Officer (“DDO”) is Simon Readhead Q.C.

### Collection of diversity data

4. Members of Chambers which, for the purposes of this policy, includes both barristers and support staff are to be given the opportunity to provide their diversity data for collection in accordance with the requirements set out in the Code of Conduct for the Bar. The DDO shall be responsible for arranging and supervising the collection of diversity data.

### Why diversity data is collected

5. Members of Chambers shall have the opportunity to provide their diversity data in order for the DDO to publish an anonymous summary of the data.

This provides transparency concerning recruiting and employment activities and aims to encourage an independent, strong, diverse and effective legal profession.

6. Please note that Members of Chambers are not required to provide any diversity data. Each member of Chambers is free to choose whether or not to provide all, some or none of his or her diversity data.

#### How diversity data is collected

7. Diversity data will be collected through the completion of a questionnaire to be returned to the DDO who will, at all times, treat the data contained in the questionnaire as private and confidential.
8. Members of Chambers will be provided with a copy of the questionnaire together with a copy of the notification and consent form which must be completed before providing any diversity data. Members of Chambers will be notified by the DDO of the deadline for completing the questionnaire which will be no less than 14 days from the date of notification.

#### Keeping diversity data secure

9. All diversity data that is collected from Members of Chambers will be kept securely. Chambers has put in place the following security measures to protect diversity data:
  - 9.1. The completed questionnaires will be stored electronically on an encrypted flash drive which will be kept in a secure cabinet in Chambers.

9.2. When DDO has collated and processed the diversity data contained in the questionnaires the questionnaires will be destroyed and a certificate of secure destruction obtained and kept by the DDO.

9.3. The collated and processed diversity data will be held by the DDO for 12 months and, where it is appropriate to do so, published by him in an anonymised form on the Chambers' website no later than 31 December in each year. Diversity data submitted in relation to religion or belief and sexual orientation will be held by the DDO for 12 months in an anonymised form but will not be published.

10. The DDO will not share diversity data with any third parties save as set out in paragraph 5 above.

11. Should a member of Chambers access or disclose diversity data, whether accidentally or intentionally, when not authorised to do so, he or she must notify the DDO immediately. Failure to do so may amount to misconduct and result in disciplinary proceedings before the Head of Chambers or the Bar Standards Board.

#### Publication of the anonymised summary of diversity data

12. The DDO is required to publish diversity data in an anonymised summary format within the three months period following the date for collection specified by the Bar Standards Board. The summary will aim to break down the information in a way which categorises each diversity characteristic against job status and role in a manner which reflects seniority within Chambers. The summary will be published on Chambers' website.

13. Diversity Data relating to sexual orientation and religion or belief will not be included in the anonymised summary format for publication.

14. Where there are fewer than ten members of Chambers within each published category who identify themselves through the questionnaire as having the same diversity characteristic (for example, four members of Chambers in the same job role or at the same level of seniority who identify themselves as disabled), the DDO shall not publish the anonymous data relating to those members of Chambers and that diversity characteristic unless the members of Chambers concerned have each consented to such publication in the knowledge that they may be identified against that characteristic.

#### Anonymising diversity data

15. The DDO is required to anonymise diversity data before publishing it in summary form on the Chambers' website. This will be achieved by:

15.1. Subdividing the diversity data collated by category, for example, age, gender, disability, ethnic group, socio-economic background etc. and by seniority and job title, for example, Queen's Counsel, junior barristers, pupils and administrative staff as set out in paragraph (12) above.

15.2. Not publishing the diversity data of members of Chambers which relates to the characteristics of sexual orientation or religion and as set out in paragraph (13) above.

15.3. Not publishing the diversity data of members of Chambers where the number of members of Chambers in a given category is fewer than ten without the express consent of all the members of Chambers in that

category to the publication of that diversity data as set out in paragraph (14) above.

15.4. Not publishing the diversity data of members of Chambers where there are reasonable grounds to believe that publication of the anonymous data would result in the identification of a members of Chambers in connection with one or more of the diversity characteristics.

#### Destruction of diversity data

16. The DDO shall securely destroy the diversity data collected promptly after the Diversity Data has been anonymised and in any event within three months following the date for collection specified by the Bar Standards Board usually the date of notification under paragraph (5) above.

17. Secure destruction means that as far as possible the diversity data will be destroyed in such a way that it is not possible to identify an individual member of Chambers. As set out in paragraph (9) above the DDO will obtain and keep a certificate of secure destruction.

18. The DDO will retain the anonymised data for 12 months before securely destroying the same as set out above.

#### Questions and complaints

19. Members of Chambers have a right to withdraw their consent or object to the use of their diversity data at any time.

20. Where a member of Chambers has already provided diversity data and wishes to withdraw his or her consent to its use, the member of Chambers should notify the DDO in writing of the diversity data in question. The DDO will promptly take steps securely to destroy the relevant diversity data and will confirm to the member of Chamber that this step has been taken within 21 days of the request being received by the DDO.
21. Where the anonymised data has already been published in summary form on Chamber's website, the DDO will not extract the diversity data from the published summary unless the member of Chambers has reason to believe that the continued publication of the anonymised diversity data is causing or is likely to cause him or her or someone else substantial damage or distress.
22. In such circumstances, the DDO will consider the reasons put forward by the members of Chambers and shall respond within 21 days from the date of the receipt by the DDO of the statement of belief by the member of Chambers with a determination whether the continued publication of the diversity data is justified and, if not, to confirm the action which has or will be taken by the DDO to extract the diversity data from the published summary on the Chambers' website.
23. Should any members of Chambers have any questions or complaints about this Diversity Data Policy, he or she should contact the DDO.

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