

## DATA DIVERSITY POLICY

1. This is the Data Diversity Policy for Furnival Chambers which is established in accordance with [paragraphs 408.2 (k) – (u) of] the Bar Standard Board Code. This policy is effective as of 10th March 2013.
2. The name of the registered data controller for Chambers is Oliver Blunt QC and the data controller's registration number on the Data Protection register is [insert number].
3. The name of the current Diversity Data Officer is Sandip Patel.

### Collection of Diversity Data

4. Members, pupils and employees 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 Diversity Data Officer shall be responsible for arranging and supervising the collection of Diversity Data.

### Why Diversity Data is collected

5. Individuals have the opportunity to provide their Diversity Data in order for Chambers to publish an anonymous summary of the Diversity Data. This provides transparency concerning recruiting and employment activities and aims to encourage an independent, strong, diverse and effective legal profession. **Please note that you are not required to provide your Diversity Data. You are free to choose whether or not you wish to provide all, some or none of your Diversity Data.**
6. Diversity Data will be collected through completing an online form/ survey and/or completing a hard copy form. Completed forms must be returned to the Diversity Data Officer.
7. You will be provided with a copy of the online form by email, together with a copy consent form which you must complete if you wish to provide your Diversity Data. Hard copy forms can be collected from Bruce Barnden. You will be notified of the deadline for completing the forms, which will be no less than 7 days from the date of notification.

### **Keeping Diversity Data secure**

8. All Diversity Data that is collected from individuals will be kept securely. The Data Diversity Officer shall put the following security measures in place to protect Diversity Data against unlawful and un authorised disclosure or access:
  - a) Diversity Data collected by email and in digital form will be stored on a secure database
  - b) Diversity Data collected in hard copy form will be stored in a secure cabinet
9. Chambers will not share Diversity Data with any third parties, save as set out in paragraph 4 above.
10. Should you access or disclose Diversity Data accidentally or intentionally when you are not authorised to do so, you must notify the Diversity Data Officer immediately. Failure to do so may amount to misconduct and result in disciplinary proceedings in accordance with Chambers' disciplinary procedure or the Bar Standards Board.

### **Anonymising Diversity Data**

11. Chambers is required to anonymise Diversity Data before publishing it in summary form. We will securely anonymise Diversity Data. Individual names will not be published. Diversity Data will be published by category.

### **Publishing Diversity Data**

12. Chambers is required to publish Diversity Data in an anonymised summary format within the three (3) month period following the date for collection specified by the Bar Standards Board. The summary will 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 made available on the 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 10 (ten) individuals within each published category who identify through the questionnaire with the same diversity characteristic (for example, 4 (four) individuals with a job role at the same level of seniority identify themselves as disabled), Chambers shall not publish the anonymous data relating to those individuals and that diversity characteristic unless the individuals concerned have each consented to such publication, in the knowledge that they may be identified against that characteristic.
15. Since Chambers currently has fewer than 10 (ten) individuals in the workforce/the job role of clerk/fees clerk/administration, individuals in these roles should be aware that by providing their Diversity Data it may be possible for a third party to identify them even though the Diversity Data is anonymised.
16. Chambers shall securely destroy the Diversity Data collected promptly after the Diversity Data has been anonymised and in any event within 3 (three) months following the date for collection specified by the Bar Standards Board (usually the date you receive notification under paragraph (5) above). Secure destruction means that as far as possible we shall not hold the Diversity Data in any way where it is possible to identify an individual. Anonymised data will be kept for 12 months before being destroyed as above.

**Questions or complaints.**

17. Individuals have a right to withdraw their consent or object to the use of their Diversity Data at any time. Where your data has already provided and you wish to withdraw your consent to its use, please notify the Diversity Data in writing. He/she will promptly delete or destroy any Diversity Data which includes your personal data and will confirm to you that this step has been taken within 21 days of receiving notification from you.
18. Where the anonymised data has been published in summary form, the Diversity Data Officer will not extract your personal data from the published summary unless you have reason to believe that continued publication of the anonymised data is causing or is likely to cause you or someone else substantial damage or distress. In such circumstances, the Diversity Data Officer will consider the reasons you have put forward and shall respond within 21 days from the date you notify him/her of your

belief to let you know whether he/she has determined that the continued publication of the data is justified and, if not, to confirm the action taken to extract your data from the published summary and to delete or destroy any copies.

19. Should you have any questions or complaints about this Diversity Data Policy, please contact the Diversity Data Officer.