

DIVERSITY DATA POLICY

References to Chambers in this policy include Brick Court Chambers and its service company, Little Essex Street Service Company Ltd. References to employees are to former employees of Brick Court Chambers and current and former employees of Little Essex Street Service Company Ltd, as appropriate.

A. Introduction

1. This is Chambers' Diversity Data Policy. It is effective, in this version, as of the date of its approval by the Executive Committee, set out below.
2. This is one of a number of specific policies aimed at achieving the objectives of Chambers' Equality and Diversity Policy, which sets out Chambers' overarching rules, principles and procedures for preventing discrimination, ensuring equality of opportunity, and promoting diversity, and which should be read together with this policy. Any queries, concerns, issues, complaints or grievances in respect of this policy should be raised with the Diversity Data Officer, or by one of the means set out in the Equality and Diversity Policy. Breaches of this policy will be dealt with as set out in the Equality and Diversity Policy.

B. Purpose and scope

3. This policy sets out Chambers' procedure for gathering and publishing diversity data in accordance with rules C110.p to .t of the Bar Standards Board Handbook.
4. This policy applies to all members of Chambers, pupils and employees.

C. Diversity Data Officer

5. The Diversity Data Officer, as appointed and notified to the Bar Standards Board from time to time, will be identified on the main equality and diversity page of Chambers' website.

D. Collection of diversity data

6. Members of Chambers, pupils and employees are given the opportunity to provide their diversity data for collection in accordance with the Bar Standards Board's requirements and for the purposes set out below. The Diversity Data Officer is responsible for arranging and supervising the collection of diversity data. Diversity data is collected once every three years. As of the date of this Policy, the data is due to be collected next in July 2022.

E. Why Diversity Data is collected

7. Individuals have the opportunity to provide their diversity data in order for Chambers to publish an anonymous summary of such data. This provides transparency concerning recruiting and employment activities across chambers and analysis of diversity data encourages a strong, diverse and effective legal profession.
8. You are not obliged to provide your diversity data. You are free to provide all, some or none of your diversity data. Individuals may withdraw their consent to the use of the data at any time.

F. How diversity data is collected

9. Diversity data will be collected through the completion of an online form, on an anonymous basis. The online form shall be based on the model questionnaire provided by the BSB. The Data Diversity Officer shall be responsible for the setting-up and operation of the online form system and the collection/compilation of data from the online survey. The Data Diversity Officer may be assisted in this by one or more members of staff as reasonably necessary (and subject to paragraph 11 below).
10. You will be provided with a link to the online form by email. The online form shall ask for your consent to the provision and processing of your personal data in accordance with the BSB's rules and this policy.

G. Keeping diversity data secure

11. All diversity data that is collected from individuals will be kept securely. Chambers shall put the following security measures in place to protect diversity data:
 - (1) In setting up and operating the online form system, the Diversity Data Officer shall liaise with Chambers' IT staff in order to establish secure electronic barriers such that the data collected is kept secure and confidential.

(2) If a third-party provider is used to host the online form system, the Diversity Data Officer shall liaise with IT staff to select a provider which ensures that the data is collected on a secure and confidential basis.

(3) The Diversity Data Officer shall be responsible for ensuring that access to the diversity data (which is collected anonymously) is restricted only to one or more members of staff who require access for the purpose stated in paragraph 9 above. They will be informed of the confidentiality of the data.

12. Chambers will not share diversity data with any third parties, save as set out in paragraph 11 above.

H. Anonymising diversity data

13. Diversity data shall be collected on an anonymous basis. The diversity data shall therefore always be processed and held in anonymised form.

I. Publication of the anonymised summary of Diversity Data

14. Chambers shall publish on its website a summary of the anonymised diversity data, in accordance with the BSB rules. This shall provide a breakdown of diversity characteristics (in particular gender, ethnicity, disability, age, religion or belief, sexual orientation, socio-economic background and caring responsibilities) split between QC tenants, non-QC tenants, pupils and employees of Chambers.

15. If there is a real risk that the publication of the summary of anonymous data would result in the identification of an individual in respect of one or more of their diversity characteristics, Chambers shall not publish that part of the information unless it has the consent from the individuals affected.

J. Summary of data provided to the Equality and Diversity Officer

16. In addition to the anonymised summary which is published as above, the Diversity Data Officer may provide a more detailed summary of the anonymised data to the Chair of the Equality and Diversity Committee to be shared with the committee.

K. Destruction of Diversity Data

17. Anonymised data will be kept for 12 months after collection, in accordance with BSB rules. The Data Diversity Officer will be responsible for securely destroying the diversity data collected within three months thereafter. Secure destruction means that as far as possible Chambers shall not hold the diversity data in any way where it is possible to identify an individual.

L. Questions or complaints

18. You have a right to withdraw your consent or object to the use of your diversity data at any time.
19. Where your data has already been provided and you wish to withdraw your consent to its use, please notify the Diversity Data Officer in writing. They 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.
20. 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 it is likely that continued publication could 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 them of your belief to let you know whether they have 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.

Approved by the Executive Committee on 6 May 2021.

To be reviewed by the Equality and Diversity Committee every two years.