

## 7 King's Bench Walk Diversity Data Policy

### General

1. This is the Diversity Data Policy for 7 King's Bench Walk which is established in accordance with Rule C110(3)(n)-(t) of the BSB Handbook Equality Rules.
2. The name of the registered data controller for 7 King's Bench Walk is 7 KBW Ltd and the data controller's registration number on the Data Protection register is Z3273258.
3. The name of the Diversity Data Officer ("DDO") is Chantal Perdreau. Chambers will notify the BSB of any change to the identity of the DDO as soon as reasonably practicable.

### Collection of Diversity Data

4. Members of Chambers' workforce are to be given the opportunity to provide their Diversity Data for collection in accordance with the BSB's requirements and the prescribed model questionnaire set out at the end of Section 7 of the Supporting Information to the BSB Handbook Equality Rules. The DDO 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 7 King's Bench Walk 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.**

## **How Diversity Data is Collected**

6. Prior to collection of any diversity data, the DDO will provide Chambers' workforce with a copy of this written policy statement and ask for explicit consent from Chambers' workforce to the provision and processing of their Diversity Data in accordance with this policy and Rule C110(3)(n)-(t) of the BSB Handbook Equality Rules.
7. Diversity Data will be collected through completion of a hard copy form to be placed in a dedicated box in the Clerks' Room.
8. You will be provided with a copy of the form by email, together with a copy of the consent form which you must complete if you wish to provide your Diversity Data.
9. 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**

10. 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) The data will be collected in hard copy, through submission of hard copy questionnaire responses to be placed in a dedicated box. Once collected, the data will be recorded on the DDO's computer under a file which is password-protected and the hard copies will be destroyed.
  - (2) Chambers will not share Diversity Data with any third parties, save as set out in paragraph 13 below.
11. Should you access or disclose Diversity Data accidentally or intentionally when you are not authorised to do so, you 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 BSB.

### **Anonymising Diversity Data**

12. Chambers is required to anonymise Diversity Data before publishing it in summary form. We will securely anonymise Diversity Data through its being collected in such a manner that only the person providing data can identify the person to whom it relates.

### **Publication of the anonymised summary of Diversity Data**

13. Chambers is required to publish Diversity Data in an anonymised summary format in accordance with the requirements of the BSB. 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. An accurate and updated summary will be published on Chambers' website every three years.
14. There is no longer an additional restriction on the publication of sexual orientation and religion or belief data: the requirements of C110.3(q-s) apply consistently across all diversity characteristics, as set out in the model questionnaire at the end of Section 7 of the Supporting Information to the BSB Handbook Equality Rules.
15. 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.
16. Since Chambers currently has fewer than 10 (ten) individuals in the job role of pupil, individuals in that role 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.

## **Destruction of Diversity Data**

17. Chambers will 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 of collection. Secure destruction means that as far as possible we shall not hold the Diversity Data in any way where it is possible to identify the individual to whom the data relates. The hard copies on which data is originally submitted will be destroyed immediately after the data has been recorded by the DDO. Anonymised data will be kept for 12 months before being destroyed as above.

## **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 DDO 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.
20. Where the anonymised data has been published in summary form, the DDO 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 DDO 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.
21. Should you have any questions or complaints about this Diversity Data Policy, please contact the DDO.

## **Distribution**

22. A copy of this policy will be:

- (1) Distributed by email to every current member of Chambers, employee and pupil;
- (2) Made available to all new members of Chambers, pupils or mini-pupils;
- (3) Available at all times on Chambers' website.

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