

## **Frederick Place Chambers Diversity Data Policy**

This is the Diversity Data Policy for Frederick Place Chambers, which is established in accordance with rule C110 (3)t of Section D of Part 2 of the Bar Standards Board Handbook.

This policy is effective as of 6 January 2021.

**(1) The name of the Diversity Data Officer (“DDO”) is Robert Spicer.**

### **(2) Collection of Diversity Data**

Members of Chambers' workforce are to be given the opportunity to provide their Diversity Data for collection in accordance with the requirements set out in the Bar Standards Board Handbook. The Diversity Data Officer shall be responsible for arranging and supervising the collection of Diversity Data.

### **(3) Why Diversity Data is collected**

Individuals have the opportunity to provide their Diversity Data in order for Frederick Place Chambers to publish an anonymous summary of the Diversity Data. This provides transparency concerning recruiting and employment activities across chambers and analysis of diversity data encourages a strong, diverse and effective legal profession.

**Please note that you are not required to provide your Diversity Data. You are free to provide all, some or none of your Diversity Data.**

### **(4) How Diversity Data is collected**

Diversity Data will be collected either through a questionnaire to be returned to the DDO. The DDO will, at all times, treat the data collected as private and confidential.

You will be provided with a copy of the questionnaire, together with an express (and emphasised) statement that by submitting your response, you explicitly consent to the collection, processing and use (including publication in anonymised, collated form) of the diversity data you provide for the purposes set out at (4) above. You will be notified of the deadline for completing the forms.

#### **(5) Keeping Diversity Data secure**

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 completed paper questionnaires will be stored in a locked drawer in Chambers. When the DDO has collated and processed the diversity data contained in the questionnaires the questionnaires will be destroyed via the Chambers secure document destruction system.
2. 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 them in an anonymised form on the Chambers website as required under Bar Standards Board Rules. The DDO will not share diversity data with any third parties.

Should you access or disclose Diversity Data, whether accidentally or intentionally, when 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 Bar Standards Board.

#### **(6) Anonymising Diversity Data**

Chambers is required to anonymise Diversity Data before publishing it in summary form. We will securely anonymise Diversity Data through a division of the data collated by category, for example, gender, disability, age, ethnic group, socio-economic background etc. and by seniority and job title, for example, Queen's Counsel, junior barristers, pupils and administrative staff.

### **(7) Publication of the anonymised summary of Diversity Data**

Chambers is required to publish Diversity Data in an anonymised summary format in accordance with the requirements of 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 published on the Chambers website.

Where there would be sufficiently few individuals within a published category such that there would be a real risk of the individuals being identified (for example, one female QC who identifies herself as disabled), Chambers will not publish the anonymous data relating to those individuals in that form, unless the individuals concerned have each given their informed consent to such publication, in the knowledge that they may be identified against that characteristic. Instead, Chambers' published summary may refer to such a category in a form that means that the individuals would not be subject to a real risk of identification. For example, the summary might amalgamate groups (considering the total number of disabled members of chambers, for example), or might state that the number of people in a particular category was under five.

### **(8) Destruction of Diversity Data**

Chambers will securely destroy the Diversity Data collected promptly after the Diversity Data has been anonymised and in any event within 3 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 an individual. In practice, data will be destroyed via the Chambers secure document destruction system. Anonymised data will be kept for 12 months before being destroyed as above.

### **(9) Questions or complaints**

You have a right to withdraw your consent or object to the use of your Diversity Data at any time.

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 at Frederick Place Chambers, 9 Frederick Place, Bristol, BS8 1AS. 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.

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 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.

Should you have any questions or complaints about this Diversity Data Policy, please contact the Diversity Data Officer at [robert.spicer@frederickchambers.co.uk](mailto:robert.spicer@frederickchambers.co.uk).

6 January 2021