



## DIVERSITY DATA POLICY

1. This policy sets out how and why Selborne Chambers (“**Chambers**”) collects and retains Diversity Data.
2. The name of the Diversity Data Officer is Daniel Webb. He may be contacted at [daniel.webb@selbornechambers.co.uk](mailto:daniel.webb@selbornechambers.co.uk).
3. The name of Chambers’ registered data controller is Alexander Goold and his registration number on the Data Protection register is Z5805865.

### Collection of Diversity Data

4. Members and employees of Chambers are to be given the opportunity to provide their Diversity Data for collection in accordance with the Bar Standard Board’s requirements.
5. The Diversity Data Officer shall be responsible for arranging and supervising the collection of Diversity Data.

### Why Diversity Data is collected

6. 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.
7. **Please note that you are not obliged 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

8. Diversity Data will be collected by completing a questionnaire (electronically or in hardcopy) which may be returned to the Diversity Data Officer in a sealed envelope (delivered to Chambers) or electronically to [daniel.webb@selbornechambers.co.uk](mailto:daniel.webb@selbornechambers.co.uk) You will be provided with a copy of the form by email.

9. If you are unable to complete the online form in the format provided and would like it to be provided to you in a different format, please contact the Diversity Data Officer.

**Keeping Diversity Data secure**

10. The Diversity Data Officer will be the data controller, for the purposes of the Data Protection Act 1998, in relation to the Diversity Data so collected.
11. All Diversity Data that is collected from individuals will be kept securely. The Diversity Data Officer shall put the following security measures in place to protect Diversity Data:
- (a) Hardcopy documents will be scanned and then disposed of in Chambers' confidential document bins.
  - (b) Electronic documents (including scanned copies of any hardcopy documents) will be encrypted using "Boxcryptor" or similar software and kept in a secure Dropbox account.
12. If Diversity Data is received by email, the Diversity Data Officer shall separate any completed questionnaires from the covering emails before reviewing the Diversity Data provided. The Diversity Data Officer will then delete the covering emails.
13. The Diversity Data Officer will not share Diversity Data with any third parties, save as set out in paragraph 6 above. 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.

**Anonymising Diversity Data**

14. The Diversity Data Officer will anonymise Diversity Data before publishing it in summary form.

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

15. The Diversity Data Officer will use the Diversity Data set out in the completed questionnaires in order to prepare, and publish on Chambers' website, a summary form of the anonymised

Diversity Data. The Diversity Data Officer shall exclude from publication Diversity Data in relation to any characteristic where there is a real risk that individuals could be identified, unless all affected individuals consent.

#### **Destruction of Diversity Data**

16. The Diversity Data Officer shall 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 the Diversity Data Officer shall not hold the Diversity Data in any way where it is possible to identify an individual.
17. 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 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 Officer in writing at [daniel.webb@selbornechambers.co.uk](mailto:daniel.webb@selbornechambers.co.uk). He 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.
19. 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 her of your belief to let you know whether he 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.
20. Should you have any questions or complaints about this Diversity Data Policy, please contact the Diversity Data Officer on [daniel.webb@selbornechambers.co.uk](mailto:daniel.webb@selbornechambers.co.uk).

21. This policy was adopted on the date below and will be reviewed regularly.

Approved by the Board, 24 April 2019

Last reviewed by the Diversity Data Officer, 15 April 2021

Reviewed by the Diversity Data Officer, 1 July 2022