

# DIVERSITY DATA POLICY

February 2022



1. 4-5 Gray's Inn Square is registered as a data controller and its registration number on the Data Protection Register is ZA029392.
2. The name of the Diversity Data Officer is **Max Shephard**.

## Collection of Diversity Data

3. Members of chambers' workforce are given the opportunity to provide their Diversity Data for collection in accordance with the Bar Standards Board's requirements. The Diversity Data Officer is responsible for arranging and supervising the collection of Diversity Data.

## Why Diversity Data is collected

4. Individuals have the opportunity to provide their Diversity Data in order for 4-5 Gray's Inn Square 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. Please note: You are not obliged to provide your Diversity Data. You are free to provide all, some, or none of your Diversity Data.

## How Diversity Data is collected

5. Diversity Data will be collected every three years using the model questionnaire provided by the Bar Standards Board.
6. You will be provided with a hard copy or electronic questionnaire to complete. If you wish to provide your Diversity Data, you must return the questionnaire together with your explicit consent. These should be returned to the Diversity Data Officer by the specified

deadline. The specified deadline will not be less than 7 days from the date on which the documents are provided.

### **Keeping Diversity Data secure**

7. All Diversity Data that is collected from individuals will be kept securely. The Diversity Data Officer will ensure such data remains confidential and is stored in a lockable filing cabinet until it is destroyed. If electronic versions are kept the data shall be password protected.
8. 4-5 Gray's Inn Square will not share Diversity Data with any third parties, save as set out in this policy and with any party approved by the Management Committee to assist with the collection and analysis of Diversity Data.
9. The data will be collected anonymously **and held by Google**<sup>1</sup>. Those with access to the account will be the Diversity Data Officer, senior staff members of 4-5 Gray's Inn Square, and those approved by the Management Committee to assist with the collection and analysis of Diversity Data.
10. Should any person access or disclose Diversity Data for 4-5 Gray's Inn Square accidentally or intentionally when they are not authorised to do so, they must notify the Diversity Data Officer immediately. Failure to do so may amount to misconduct and result in disciplinary proceedings within Chambers or before the Bar Standards Board.

### **Anonymising Diversity Data**

11. 4-5 Gray's Inn Square will anonymise Diversity Data before publishing it in summary form. This will be done in accordance with the requirements of the Bar Standards Board.

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

12. 4-5 Gray's Inn Square is required to publish Diversity Data in an anonymised summary format. The summary will break down the information in a way that categorises each diversity characteristic against job status and role, in a manner that reflects seniority

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<sup>1</sup> The platform used will be Google Forms. A link to the Google's privacy policy is here: <https://policies.google.com/privacy?hl=en-US>

within 4-5 Gray's Inn Square. The summary will be published on Chambers' website every three years.

13. Diversity Data relating to sexual orientation and religion or belief will not be included in the anonymised summary format for publication without consent.
14. Where there is a real risk that individual(s) could be identified by publication of a specific characteristic, the anonymous data shall not be published without the informed consent of the relevant individual(s).

### **Destruction of Diversity Data**

15. The Diversity Data Officer will securely destroy the Diversity Data collected promptly 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 an individual. In practice, for hard copy data this means shredding or arranging for secure destruction by a reputable firm. If held electronically then this means deleting the data.

### **Questions or complaints**

16. You have a right to withdraw your consent or object to the use of your Diversity Data at any time.
17. Where your data has already been provided and you wish to withdraw your consent to its use, please notify the Diversity Data Officer by writing to them at Chambers' address. 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 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 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 by writing to them at Chambers' address.

