



TEN OLD SQUARE

Equality and Diversity

Diversity Data Policy

This is the Data Diversity Policy for Ten Old Square which is established in accordance with the Bar Standards Board Code.

1. The registered data controller

- 1.1 The name of the registered data controller for Ten Old Square is Keith Plowman and the data controller's registration number on the Data Protection register is Z4862349

2. The Diversity Data Officer

- 2.1 The name of the Diversity Data Officer is Keith Plowman

3. Collection of Diversity Data

- 3.1 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 Code of Conduct for the Bar. The Diversity Data Officer shall be responsible for arranging and supervising the collection of Diversity Data.

4. Why Diversity Data is collected

- 4.1 Individuals have the opportunity to provide their Diversity Data in order for Ten Old Square 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.
- 4.2 Members of Chambers' workforce are not required to provide their Diversity Data. They are free to choose whether or not they wish to provide all, some or none of their Diversity Data.

5. How Diversity Data is collected

- 5.1 Diversity Data will be collected through the completion, collection and collation of a Diversity Data Questionnaire by the Diversity Data Officer
- 5.2 Members of Chambers' workforce will be provided with a copy of the form by email, together with a copy consent form which a member must complete if they wish to provide their Diversity Data. They will be notified of the deadline for completing the forms, which will be no less than 7 days from the date of notification.

6. Keeping Diversity Data secure

- 6.1 All Diversity Data that is collected from individuals will be kept securely. Ten Old Square shall put the following security measures in place to protect Diversity Data:
 - (i) All questionnaires are submitted anonymously. Completed questionnaires will be kept in a file held by the Diversity Data Officer only. The information will be collated using Excel and the resulting spreadsheet will be encrypted and password protected.
 - (ii) Ten Old Square will not share Diversity Data with any third parties, save as set out in paragraph 4 above.
 - (iii) Should a member of Chambers' workforce access or disclose Diversity Data 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 before the Ten Old Square Management Committee or the Bar Standards Board.

7. Anonymising Diversity Data

- 7.1 Ten Old Square is required to anonymise Diversity Data before publishing it in summary form. They will securely anonymise Diversity Data through anonymised, confidential questionnaires seen only by the Diversity Data Officer. All Diversity Data will be summarized and Data relating to religious beliefs or sexual orientation will not be published.

8. Publication of the anonymised summary of Diversity Data

- 8.1 Ten Old Square is required to publish Diversity Data in an anonymised summary format within the three (3) month period following the date for collection specified by 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 Ten Old Square. The summary will be published on Chambers' website.

Diversity Data relating to sexual orientation and religion or belief will **not** be included in the anonymised summary format for publication.

- 8.2 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), Ten Old Square 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.
- 8.3 Since Ten Old Square currently has fewer than 10 (ten) individuals in the Clerks' Room individuals in the Clerks' Room 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.

9. Destruction of Diversity Data

- 9.1 Ten Old Square shall 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 for collection specified by the Bar Standards Board (usually the date you receive notification under paragraph (5) above). Secure destruction means that as far as possible Ten Old Square shall not hold the Diversity Data in any way where it is possible to identify an individual. In practice the Diversity Data collected will be shredded by the Diversity Data Officer.
- 9.2 Anonymised data will be kept for 12 months before being destroyed as above.

10. Questions or complaints

- 10.1 Individuals have a right to withdraw their consent or object to the use of their Diversity Data at any time,
- 10.2 Where data has already been provided and a member of Chambers' workforce wishes to withdraw their consent to its use, they should notify the Diversity Data in writing to Keith Plowman (keithplowman@tenoldsquare.com). He will promptly delete or destroy any Diversity Data which includes that provider's personal data and will confirm to that provider that this step has been taken within 21 days of receiving notification from the member.

- 10.3 Where the anonymised data has been published in summary form, the Diversity Data Officer will not extract a member's personal data from the published summary unless the member has reason to believe that continued publication of the anonymised data is causing or is likely to cause the member or someone else substantial damage or distress. In such circumstances, the Diversity Data Officer will consider the reasons the member has put forward and shall respond within 21 days from the date the member notifies him of the belief to let the member know whether he has determined that the continued publication of the data is justified and, if not, to confirm the action taken to extract the data from the published summary and to delete or destroy any copies.
- 10.4 Should a member of Chambers' workforce have any questions or complaints about this Diversity Data Policy, please contact the Diversity Data Officer on 020 7405 0758 or by email to keithplowman@tenoldsquare.com