

7 Harrington Street Chambers

Diversity Data Policy

1. The name of the registered Data Controller for 7 Harrington Street is James Rae and the Data Controller's registration number on the Data Protection register is Z9331596.
2. The name of the Diversity Data Officer is Hannah Brookfield.

Collection of Diversity Data

3. Individuals who work from Chambers 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.

Why Diversity Data is collected

4. Individuals have the opportunity to provide their Diversity Data in order for 7 Harrington Street to publish an anonymous summary of the Diversity Data. This provides transparency concerning recruitment and employment activities and aims to encourage an independent, strong, diverse and effective legal profession.
5. No individual will be required to provide his or her Diversity Data, but will be free to choose whether or not to provide all, some or none of his or her Diversity Data.

How Diversity Data is collected

6. Diversity Data will be collected through completion of a hard copy questionnaire form, which will be provided to all members of Chambers and staff for them to complete and return, if they decide to do so.

7. Individuals will also be provided with a copy of consent form, which must be completed and returned with any completed questionnaire providing Diversity Data. Individuals will be notified of the deadline for completing the forms, which will be no less than 7 days from the date of the forms being provided.

Keeping Diversity Data secure

8. All Diversity Data collected from individuals will be kept securely and subject to the security measures set out below.
9. The security of data shall be the responsibility of Hannah Brookfield (Diversity Data Officer), Janet Reaney (Equality and Diversity Officer) and Richard Pratt Q.C. (Head of Chambers).
10. Diversity Data shall be kept securely in a secure locked cabinet.
11. In order to protect against unauthorised access to any data, only encrypted Chambers computers shall be used to process Diversity Data.
12. James Rae (Data Protection Officer) will strictly ensure that the only people who may access the data are those persons whose roles require it, namely Hannah Brookfield (Diversity Data Officer), Janet Reaney (Equality and Diversity Officer), John Kilgallon (Practice Manager), Claire Tumilty (Chambers Administrator) and James Rae (Data Protection Officer).
13. Diversity Data shall be safely destroyed as set out below.
14. 7 Harrington Street will not share Diversity Data with any third parties, save as set out in paragraph 4 above.
15. Should any individual access or disclose Diversity Data accidentally or intentionally when not authorised to do so, that individual must notify the Diversity Data Officer immediately. Failure to do so may be investigated as potential misconduct and may result in disciplinary proceedings within Chambers or before the Bar Standards Board.

Anonymising Diversity Data

16. 7 Harrington Street is required to anonymise Diversity Data before any publication in summary form. This will necessitate the Diversity Data being securely anonymised by the removal of names and any identifying information from the Diversity Data .

Publication of the anonymised summary of Diversity Data

17. 7 Harrington Street is required to publish Diversity Data in an anonymised summary format within the three 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 7 Harrington Street.
18. The summary will be published online via the chambers website.
19. Diversity Data relating to sexual orientation and religion or belief will not be included in the anonymised summary format for publication.
20. Where, based on the questionnaire returns, there are fewer than ten individuals within each published category with the same diversity characteristic (for example, four individuals with a job role at the same level of seniority identify themselves as disabled), 7 Harrington Street shall not publish the anonymous data relating to those individuals and that diversity characteristic unless the individuals concerned have each consented to such publication.
21. Individuals may withhold or withdraw consent at any time, before or after publication of the anonymised data.

Destruction of Diversity Data

22. 7 Harrington Street Chambers shall securely destroy the Diversity Data collected promptly after the Diversity Data has been anonymised and in any event within three months following the date for collection specified by the Bar Standards Board. Secure destruction means that, as far as possible, 7 Harrington Street Chambers shall not hold the Diversity Data in any way where it is possible to identify an individual. In practice this will involve using the services of a company specialising in the secure removal and destruction of paper and confidential waste.
23. Anonymised data will be kept for 12 months before being destroyed in the same way.

Questions or complaints

24. Individuals have a right to withdraw their consent or to object to the use of their Diversity Data at any time.

25. Where Diversity Data has already been provided and an individual wishes to withdraw consent to its use, the Diversity Data Officer, Hannah Brookfield, should be notified in writing (at 7 Harrington Street, L2 9YH or at hannah.brookfield@7hs.co.uk). The Diversity Data Officer will promptly delete or destroy the Diversity Data concerned and will provide written confirmation that this step has been taken within 21 days of receiving notification from the individual.
26. Where the anonymised data has been published in summary form, the Diversity Data Officer will not extract an individual's personal data from the published summary unless that individual has reason to believe that continued publication of the anonymised data is causing or is likely to cause substantial damage or distress (whether to the individual or someone else). In such circumstances, the Diversity Data Officer will consider the reasons put forward by the individual and shall respond within 21 days from the date of notification by the individual with a decision as to whether the continued publication of the Diversity Data concerned is justified and, if not, and with confirmation as to any action taken to extract the Diversity Data from the published summary and to delete or destroy any copies.
27. Should there be any questions or complaints about the Diversity Data Policy, contact should be made with the Diversity Data Officer in writing to Hannah Brookfield, 7 Harrington Street, L2 9YH or by e-mail to hannah.brookfield@7hs.co.uk or by telephone to Hannah Brookfield on 0151 242 0707.

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22 October 2014