

## **DIVERSITY DATA POLICY**

1. This is the Data Diversity Policy for Three Stone Chambers (“Chambers”). The name of the registered data controller for Chambers is John McDonnell K.C.. The name of the Diversity Data Officer (“the DDO”) is Stuart Cutting.

### **Collection of diversity data**

2. 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 DDO is responsible for arranging and supervising the collection of Diversity Data.

### **Why diversity data is collected**

3. Individuals have the opportunity to provide their Diversity Data in order for Chambers 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**

4. Diversity Data will be collected through the completion of either an online form or a paper form (“the Form”) and then returning the Form, together with the notification and consent form (“the Consent Form”), in a sealed envelope marked “Diversity Data” to the Senior Clerk, who will pass the sealed collected envelopes to the DDO.
5. You will be provided with a copy of the Form or a link to the Form online by email, together with a copy of the Consent Form which you must complete if you wish to provide your Diversity Data. You will be notified of the deadline for completing the Form and the Consent Form, which will be no less than 7 days from the date of the notification.

### **Keeping diversity data secure**

6. 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. Both the Form and the Consent Form, when completed, will be kept in a single file (“the Diversity Data File”), which will be held within Chambers in a securely locked filing cabinet. The DDO will be the only person who can obtain access to the Diversity Data File, and will be responsible

for its removal from, and replacement in, the locked filing cabinet. No additional copies of any of either the Form or the Consent Form, as completed, will be held or stored in either paper or electronic form.

7. Chambers will not share Diversity Data with any third parties, save as set out in paragraph 4 above.
8. Should you access or disclose Diversity Data accidentally or intentionally when you are not authorised to do so, you must notify the DDO immediately.

### **Anonymising diversity data**

9. Chambers is required to anonymise Diversity Data before publishing it in summary form. We will securely anonymise Diversity Data by ensuring that no details are included in any summary which could lead to the risk of identification of any individual who has provided Diversity Data.

### **Publication of the anonymised diversity data summary**

10. 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.
11. The summary will be published online.
12. Diversity Data relating to sexual orientation and religion or belief will not be included in the anonymised summary format for publication.
13. 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), Chambers will not publish the anonymous data relating to those individuals unless it has their informed consent to do so.

### **Destruction of diversity data**

14. Chambers will 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 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 as soon

as the Diversity Data has been collated and summarised in an anonymised format all copies of the Forms will be shredded within Chambers before being included with other sensitive or confidential documentary material which will be sent for secure shredding and destruction. Anonymised data will be kept for 12 months before being destroyed as above.

### **Questions or complaints**

15. You have a right to withdraw your consent or object to the use of your Diversity Data at any time.
16. Where your Diversity Data has already been provided and you wish to withdraw your consent to its use, please notify the DDO in writing (both in hard copy to be delivered to Chambers address and by email to: [scutting@threestone.law](mailto:scutting@threestone.law)). The DDO will act promptly to 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.
17. Where the anonymised data has been published in summary form, the DDO 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 DDO will consider the reasons you have put forward and shall respond within 21 days from the date you notify the DDO of your belief to let you know whether the DDO 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.

November 2022

Should you have any questions or complaints about this Diversity Data Policy, please contact the DDO at: Three Stone, 3 Stone Buildings, Lincoln's Inn, London, WC2A 3XL or by email to [scutting@threestone.law](mailto:scutting@threestone.law).

## **NOTIFICATION AND CONSENT FORM FOR DIVERSITY DATA PROVISION**

1. Three Stone Chambers (“Chambers”) is required by the Bar Standards Board to give you the opportunity to submit diversity data so that such data may be published in anonymised summary form. You are under no obligation to provide diversity data and if you submit diversity data, you do so voluntarily.
2. Apart from data relating to religion or belief and sexual orientation, which will not be published unless there is consent from all members of the workforce, any diversity data that you submit will be processed for the purposes of publishing an anonymous summary on Chambers’ website or made available on request to members of the public in electronic or hard copy form.
3. Diversity data you submit relating to religion or belief and sexual orientation will be anonymised and held by Chambers for 12 months but not published. The anonymous summary will categorise each diversity characteristic against job status and role, in a manner which reflects seniority within Chambers.
4. If you would like further information about the collection and use of diversity data, please refer to our Diversity Data Policy available on Chambers’ website. You have a right to object to the use of your diversity data at any time, or withdraw your consent to its use, by contacting the Diversity Data Officer, Stuart Cutting at [scutting@threestone.law](mailto:scutting@threestone.law)

### **Consent Questions**

5. I explicitly consent to the processing and publication of my data as set out in this form and (name) diversity data policy. Yes/No
6. I explicitly consent to the publication of my data in anonymous form even if there are fewer than 10 individuals identified against one or more of the characteristics. I understand that this may result in identification. Yes/No