

**Privacy Notice for Graduation Ceremonies 2026 of the University of Winchester**  
version for [www.winchester.ac.uk](http://www.winchester.ac.uk)

This privacy notice relates to the University of Winchester's 2026 Graduation Ceremonies. It will explain what type of information the University collects from its students and their guests, how this information is collected, why it is collected, and what the University will do with this information, including how it is stored.

This privacy notice will also detail the lawful bases, under UK GDPR, the University is relying on to process this information, the data rights of the individuals whose data is being processed, and who to contact if these individuals have queries.

**1. What type of information the University collects?**

- 1.1. For the purposes of the 2026 Graduation Ceremonies, the University will need to collect and process a limited amount of personal data on:
  - (a) Graduating students; and
  - (b) The guests of graduating students who are attending the Graduation Ceremonies
- 1.2. The University will also need to collect and process information on any additional support required by students and/or their guests on the day. For example, this could mean if a student or their guest requires additional mobility support. This information is provided so that the University can deliver the best possible service at the Ceremony and would be volunteered by the student/guest either at registration or via direct contact with the Graduation team.

**2. How the University gets the information and why the University has it?**

- 2.1. Most of the personal data the University processes for its Graduation Ceremonies has been and is provided to it directly by the graduating students. This information is taken from student records systems and/or provided directly to the Graduation team through registration or email/phone contact if it has changed or been updated.
- 2.2. The University need this data to:
  - (a) Share general updates and practical information about the University's 2026 Graduation Ceremonies
  - (b) Process student awards and produce degree certificates and transcripts
  - (c) Confirm attendance at Graduation and release tickets

- (d) Create and print the Graduation programme for students and guests to use during the Graduation Ceremonies
- (e) Enable the smooth running of the Graduation Ceremonies, including ensuring the Graduation Ceremonies are accessible for all students/guests who wish to attend
- (f) Support those students and guests who will require a visa to attend Graduation
- (g) Live stream the Graduation Ceremonies on the University website, as well as an appropriate local venue for students, their guests, and University staff that are unable to attend
- (h) Keep a record of all students awarded in an academic year for our records
- (i) Comply with 'legal obligations' where the University is required to provide personal data. For example, if a subject access request is made under UK GDPR to the University.
- (j) Promote the University using publicity photographs (consent will be requested for individual or small group shots)
- (k) Celebrate the success of our students by printing names of graduates in the local newspaper (only for students who consent to this)
- (l) Contact graduates in the future about alumni news, events and fundraising (graduates can opt out of this by contacting [alumni@winchester.ac.uk](mailto:alumni@winchester.ac.uk))
- (m) Contact graduates in the future about careers support (the student can opt in for this at registration)

### **3. What the University does with the information it has**

- 3.1. The University uses the information that it has been given to organise and deliver the Graduation Ceremonies 2026.
- 3.2. The University will share a limited amount of necessary personal data with external companies to produce the degree certificates, and Graduation programme, and to enable the ceremony filming, gown hire, photography, video and ticketing purchases.
- 3.3. To produce the degree certificates, the University is using the printing company Hague Group (<https://www.hague-group.com/>)

3.4. To produce the Graduation programme, the University is using Greenhouse Graphics Limited (<https://www.greenhousegraphics.co.uk/>)

3.5. To enable filming the ceremonies, and the gown hire, photography, video and ticketing purchases, the University is using Evers Group (also known as Graduate Attire) (<https://evers.co/>)

#### **4. How the University stores your information.**

4.1. Personal data and any sensitive personal data will be kept for no longer than necessary, and decisions about its retention will be made in line with legal requirements, relevant University policies and relevant best practices.

#### **5. Lawful Bases for Processing**

5.1. Under the General Data Protection Regulation (GDPR), the 'lawful bases' the University relies on for processing the personal data are:

- (a) Your 'Consent' – an individual can remove their consent at any time where personal data has been processed under this lawful basis. To remove consent for processing as part of the Graduation ceremonies please contact: [Graduation@winchester.ac.uk](mailto:Graduation@winchester.ac.uk)
- (b) As the University is designated as a 'public authority' in law, and in accordance with paragraph 5.4 of the its [Articles of Association](#), the University requires the personal data to perform a 'Public Task';
- (c) The University have a 'legal obligation'.
- (d) The University has a 'legitimate interest' - for example, in relation to the filming of the Graduation Ceremonies, which are also streamed 'live' (and then available for approximately 2 months afterwards) on the University's website on the University website, as well screened in a local venue.

5.2. For the University to rely on 'legitimate interest' as a lawful basis for processing personal data by photographing, filming and live streaming the Graduation Ceremonies, it has undertaken the generally accepted three-part legitimate interest assessment<sup>1</sup>.

- a) Purpose test

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<sup>1</sup> Further information on the legitimate interest test is available here: [Legitimate interests | ICO](#)

The data will enable current and future University students and other interested parties and stakeholders, to access a special event which they may have otherwise been unable to attend. Some of the data will also be used to promote future Graduation Ceremonies to the University's current students as a beneficial activity via social media.

Under this test, in terms of what would the impact be if the University could not go ahead with the processing here? It would reduce the University's ability to effectively promote future Graduation Ceremonies, leading to a diminished attendance. A Graduation ceremony is traditionally regarded as the celebration of a student's time at university and one which they have worked hard to achieve. A reduced attendance would mean students less likely to be able to enjoy the occasion.

b) Necessity test

Will this processing help you achieve your purpose? Yes, it ensures the best level of attendance for the event.

Is the processing proportionate to that purpose? The processing is proportionate, restricting itself to graduate names, other limited personal data about their study, and photography/videography.

Can you achieve the same purpose without the processing? No, the photography and videography are integral to effective promotion, and the names and other limited personal data are essential for organising the event and making it accessible for both graduating students and their guests.

Can you achieve the same purpose by processing less data, or by processing the data in another more obvious or less intrusive way? No.

c) Balancing test

Is the data about people in their personal or professional capacity? The personal data, including any images, will depict students in their academic capacity.

What is the nature of the relationship and how have you used data in the past? They are University of Winchester students, and their personal information will have been used during their studies for many administrative purposes.

Do you have any evidence about expectations? Yes, from historical attitudes of students at similar events in the past, both here at Winchester and at other institutions.

Are there any other factors in these circumstances that mean they would or would not expect this type of processing in particular? All those in attendance would reasonably expect photos and videos to be taken by the University.

The University recognises that some guests of graduating students may be deemed vulnerable due to personal health conditions and seek to avoid large-scale events. Live transmission of the Graduation Ceremonies is therefore important to allow these guests to participate from afar, without placing themselves at risk by attending an event where they are in close contact with multiple guests.

- 5.3. There are certain specific circumstances, the University may also need to process a limited amount of special category data, in line with ICO guidance<sup>2</sup>. In practical terms for the Graduation Ceremonies, this would most likely be if students and/or their guests have an additional need which would have an impact upon their attendance. For example, if a student needs to be seated in a particular area to they can receive their award. This information is provided so that the University can deliver the best possible service at the Graduation Ceremony and would be volunteered by the student/guest either at registration or via direct contact with the Graduation team. If such personal data supplied for the Graduation Ceremonies 2026 is health related, it would be regarded as 'special category data' which the University would be processing under Article 9(2)(a) of the UK GDPR which relates to 'explicit consent'.

## **6. Your data protection rights**

- 6.1. Under data protection law, there are a number of potential rights available to you. More information on these can be found at <https://ico.org.uk/>
- 6.2. These rights though depend on which 'lawful basis/bases' your personal data is processed under for a particular 'processing purpose':

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<sup>2</sup> Further information on Special Category Data can be found here: [Special category data | ICO](#)

- a) If 'consent' has been used as the lawful basis for a particular 'processing purpose', there is a right to withdraw consent (if applicable).
- b) Where 'legitimate interests' has been used as the lawful basis for a particular 'processing purpose', you have the 'right to object'.
- c) Where your personal data is being processed under the 'lawful basis' of 'Public task', you have the 'right to object'; and
- d) Where the University have a 'legal obligation' to process your personal data, you have no right to erasure, nor right to data portability nor right to object.

## **7. Contact details:**

If you have any questions about how the University uses your data, or to enact your data protection rights you can raise this in the first instance with the University Data Protection Officer.

The University's Data Protection Officer:

Tel: 01962 827217

Stephen Dowell,

Email: DPO@winchester.ac.uk

The University of Winchester,

Winchester, Hampshire SO22 4NR.

United Kingdom

## **External to the University**

If you are unhappy with the University response to your data protection concerns, you may raise this with the Information Commissioner's Office (ICO)

Their address is:

Information Commissioner's Office

Wycliffe House

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113.

<https://ico.org.uk/global/contact-us/>