

Privacy Notice for Graduation Ceremonies 2025 of the University of Winchester

version for www.winchester.ac.uk

This privacy notice relates to the University of Winchester's 2025 Graduation Ceremonies. It will explain what type of information the University will collect 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 at the University and externally if these individuals have queries.

1. What type of information the University collects?

- 1.1. For the purposes of the 2025 Graduation Ceremonies, the University will need to collect and process a limited amount of personal data on:
 - (a) Graduating students – the University will already have most of this information on file, but some personal data may have changed and be updated etc.; and
 - (b) The guests of graduating students who are attending the 2025 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, if a student or guest needs 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. The information is taken from student records systems and/or provided directly to the Graduation team through registration or email/phone contact.
- 2.2. The University need this data to:
 - (a) Share general updates and practical information about the University's 2025 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 and in the Winchester Guildhall (or similar appropriate venue) for students, their guests, and University staff who are unable to attend
- (h) Promote the University using publicity photographs (consent will be requested for individual or small group shots)
- (i) Keep a record of all students awarded in an academic year for our records
- (j) Complying with 'legal obligations' where the University is required to provide personal data, for example a subject access request under UK GDPR.
- (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 you in the future about alumni news, events and fundraising (the student can opt out of this by contacting alumni@winchester.ac.uk)
- (m) Contact you 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 you have given us to organise and deliver the Graduation Ceremonies 2025.
- 3.2. The University will share a limited amount of necessary personal data with:
 - 3.2.1. The printing company Hague Group (<https://www.hague-group.com/>) in order to produce degree certificates.

3.2.2. The printing company Greenhouse Graphics Limited (<https://www.greenhousegraphics.co.uk/>) in order to produce the Graduation programme.

3.2.3. Evess Group (also known as Graduate Attire) (<https://evess.co/>) in order to enable filming, gown hire, photography, video and ticketing purchases.

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 these decisions will be made in line with legal requirements, relevant University policies and considering 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' - you can remove your consent at any time where your personal data is processed for a processing purpose related to this lawful basis. You can do this by contacting email: Graduation@winchester.ac.uk
- (b) The University has a 'legitimate interest' - for example here in relation to the filming of the Graduation Ceremonies, which is also streamed 'live' on the University's website (and is available for approximately 2 months afterwards on the University website) and there may also be a separate screening in Winchester Guildhall (or similar appropriate venue)
- (c) The University needs it to perform a 'Public task' (as the University is designated as a 'public authority' in law) in accordance with paragraph 5.4 of the University's [Articles of Association](#); and
- (d) The University have a 'legal obligation'.

5.2. Where the University has a 'legitimate interest' in processing the personal data by photographing, filming and live streaming the Graduation Ceremonies, it relies upon the generally accepted three-part legitimate interest assessment for this lawful basis¹.

- a) Purpose test

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

The data will enable current, and future students of the University and other interested parties and stakeholders, including future applicants, to access this special event and Graduation Ceremony, which they may have otherwise been unable to attend. Some of the data will 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, with students less likely to be able to enjoy an occasion which is traditionally regarded as the celebration of their time at University and one which they have worked hard to achieve.

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? Yes, it is limited to names, other limited personal data 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? Data (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 for many administrative purposes for the duration of their studies.

Do you have any evidence about expectations? Yes, from historical attitudes of students at similar events in the past.

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.

Due to Covid-19 some guests of graduating students may still be deemed vulnerable due to personal health conditions. Live transmission of the Graduation Ceremonies is therefore important to allow these guests to participate from afar, without putting themselves at risk by attending a large-scale event.

5.3. In certain specific circumstances, the University may also process a limited amount of special category data, in line with ICO guidance². 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 or guest needs additional mobility support. 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 2025 is health related, the University would be processing this so called 'special category data' (sensitive personal data) under Article 9(2)(a) of the 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':
 - 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'.

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

- 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, to enact your data protection rights or if you are unhappy with how the University has used your data 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/>