



Trinity College Dublin

Coláiste na Tríonóide, Baile Átha Cliath

The University of Dublin

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The University of Dublin**

Minutes of the Risk and Compliance Committee

Thursday, 22nd May 2025, 10.00-11.30

Trinity Board Room

Present: Professor M Cunningham (Chair), Secretary to the College/Director of Governance (Ms V Butler) (Secretary), A Blair, Academic Secretary (P Callaghan), Chief Risk Officer (J Carmichael), Professor J Gilmer, Chief Operating Officer (N Gorman), J Harty, Dr L Kiernan Knowles, College Solicitor (S MacBride), E MacLennan O'Neill, Head of Safety (Dr K Murray), S Anand Saraswati, D Scott.

In Attendance: S Brown (Minute-taker).

Apologies: Professor N Ó Murchadha, G Woods.

RCC/24-25/58 Statements of Interest

There were no statements of interest declared by members.

RCC/24-25/59 New Members' Declaration

The Chairperson invited the Chief Operating Officer to make the declaration in the language of his choice.

RCC/24-25/60 Minutes

The RCC approved the draft minutes of the meeting of 5 March 2025.

RCC/24-25/61 Matters Arising

There were no matters arising.

RCC/24-25/62 Callover

The RCC noted the callover dated 5 March 2025.

RCC/24-25/63 Risk of disruption of international research funding

Professor Sinéad Ryan, Dean of Research, and Dr Joey Gaynor, Research Development Office, joined the meeting for this item.

The Chairperson welcomed Professor Ryan and Dr Gaynor to the meeting.

Professor Ryan introduced the item with reference to her presentation dated May 2025 which had been circulated in advance, under the following headings:

- US federal funding at TCD
- TCD: trend in international funding, 2019-24
- TCD funded research by source: 2023-24
- TCD active grants with US federal funding agencies
- Impact on TCD's funding portfolio
- Changes in US federal funding
- Changes at the NIH: a funder in crisis
- Prime awards vs subawards
- Updated NIH policy for foreign subawards
- Key takeaways from policy change
- 'Countries of Concern'
- Current and future risks and risk mitigation.

In the course of her presentation, Professor Ryan noted that constant changes to US research funding policy are being made with no advance warning resulting in chaos and uncertainty within funding agencies, and in the NIH in particular.

The Chairperson thanked Professor Ryan for her presentation and opened the item to RCC members for questions.

In response to a query regarding the number of people working at Trinity whose jobs are impacted as they are funded directly through US funding agencies and whether contingency plans are being put in place, Dr Gaynor confirmed that such grants are being closely monitored which includes monitoring the associated FTEs and that he is liaising closely with HR and FSD in this regard.

In response to an observation from a member of RCC that the situation in the US is likely to deteriorate further and the need to prepare for that, Prof Ryan advised that currently with regard to US funding, only US federal funding presents a risk to Trinity. She quantified the risk by clarifying that US federal funding only amounted to 1.2% of overall research funding in 2023/24 and that only a small number of PIs have been significantly impacted. She noted that all of those PIs are known to her and to the research team and confirmed that the research team is working to support them in finding alternative sources of funding in the longer term. She acknowledged that the diversification of funding streams presents challenges in the shorter term. Dr Gaynor noted that those PIs who have been reliant solely on US funding, many of whom have spent time living in the US, will find it culturally challenging to pivot to diversifying to other funding sources, such as EU funding sources, which may require re-training from the perspective of writing grant applications.

Dr Gaynor noted that private charities are not being pressurized to the same extent as federal agencies.

The Chief Risk Officer noted that the risk presented by US research funding needs to be added to the University Risk Register.

Professor Ryan highlighted an additional risk related to the repository of knowledge and data that is stored in the US. She informed the RCC that she and her team are trying to ascertain the level of risk associated with support being withdrawn or data being deleted from databases used for research. She gave examples of this having already taken place.

Professor Ryan concluded by noting that even if the policy changes that have taken place were to be reversed, it would take a long time to recover from the damage caused.

The Chairperson summarised the discussion by noting the extremely worrying and rapidly changing nature of the US research funding environment. He thanked Professor Ryan and Dr Gaynor for providing the RCC with a clear overview of what is happening and the impact the changes to US research funding policy is having on researchers, and for providing assurance that the research team is keeping abreast of the changes and monitoring the impact on and mitigating the resulting challenges for research at Trinity.

It was agreed that Professor Ryan would provide a written update in three months' time for the Risk and Compliance Committee, including the threat to databases used for research.

The Chairperson closed the item by thanking Professor Ryan and Dr Gaynor.

Action/Decision

63.1 The RCC received the presentation from the Dean of Research dated May 2025.

63.2 A written update to be provided to RCC in three months' time, to include an update on the threat to databases used for research.

Professor Ryan and Dr Gaynor left the meeting at this point.

RCC/24-25/64 Revised Protected Disclosures (Whistleblowing) Policy

Lorraine Heffernan and Emmet Whelan of Byrne Wallace Shields LLP joined the meeting for this item.

The Chairperson welcomed Lorraine Heffernan and Emmet Whelan of Byrne Wallace Shields LLP to the meeting.

The Secretary to the College/Director of Governance introduced the item with reference to her memorandum dated 14 May 2025 which had been circulated in advance. She noted that the University has had a Protected Disclosures Policy in place that has served it well but that due to changes in the legislation, it had been necessary to update the policy. She informed the RCC that the Secretary's Office had worked with Byrne Wallace Shields LLP to ensure that the policy was compliant with the new legislation. She advised that communications and training plans have been developed and that training would be provided to all those involved in managing protected disclosures. It was confirmed that training would be organised through the College Secretary's Office.

Lorraine Heffernan advised that the new legislation had resulted in significant changes to the regime and that the policy needed to reflect those changes. She informed the RCC that she was satisfied that the changes made to the policy would ensure that the University would be compliant with the legislation. Emmet Whelan acknowledged that the policy was long but advised that this reflected the significant detail provided in the statutory guidance document that had been produced for public bodies and considered that it was useful to have such detail included in the policy.

The College Solicitor thanked Byrne Wallace Shields LLP for their work and noted that they were leading experts in the field and had assisted the Government with writing the statutory guidance for public bodies. She informed the RCC that should a protected disclosure arise, no one would deal with this in isolation; internal and external legal advice would be sought as required.

In response to a query from a member of RCC regarding how a person making a disclosure could be sure that they would be protected if the matter were to be investigated internally, Emmet Whelan advised that the policy sets out clearly what protections are available and makes it clear that Trinity will manage the reporting of disclosures in a proper manner. He acknowledged that while the policy may not eradicate such fears nonetheless the policy would operate in the context of the lived experience of the university where senior management encourage workers to come forward to report concerns about relevant wrongdoings happening at work. It was noted that the communications plan should also aim to allay such fears.

The Secretary to the College/Director of Governance noted that the purpose of many of the changes made to the legislation was to increase the protections of workers making disclosures under the Protected Disclosures Act. It was noted that training should incorporate testing using real life scenarios to ensure that processes were tested ahead of actual protected disclosures being made.

The RCC approved the revised Protected Disclosures (Whistleblowing) Policy and recommended it for approval to the Board.

The Chairperson closed the item by thanking Lorraine Heffernan and Emmet Whelan.

Action/Decision

64.1 The RCC approved the memorandum from the Secretary to the College/Director of Governance dated 14 May 2025 and accompanying documentation and recommended it for approval to the Board.

Lorraine Heffernan and Emmet Whelan left the meeting at this point.

RCC/24-25/65 Quarterly Chief Risk Officer Report 2025

The Chief Risk Officer introduced the item with reference to her report dated May 2025 which had been circulated in advance. She highlighted that one of the key challenges was the level of

compliance with the risk register, noting the importance of areas taking ownership of the management of risks through the risk management system.

The RCC noted and approved the Quarterly Chief Risk Officer Report 2025.

RCC/24-25/66 Associated Companies – Directors Reports

The Secretary to the College/Director of Governance presented the item with reference her memorandum which had been circulated in advance. She reminded RCC members that the purpose of the Directors Reports was to provide assurance every 6 months that Trinity's subsidiary companies are being monitored.

She informed the RCC that earlier that day, the directors of Trinity Asia Services Ltd had approved that the company was to go into liquidation and to be wound up and that the small amount of finances remaining would transfer back to Trinity. She clarified that the original purpose of establishing the company to support academic activities was no longer required.

The RCC noted and approved the memorandum from the Secretary to the College/Director of Governance dated 16 May 2025 and accompanying Associated Companies Directors' Reports.

Action/Decision

66.1 The RCC noted and approved the memorandum from the Secretary to the College/Director of Governance dated 16 May 2025 and accompanying Associated Companies Directors' Reports.

RCC/24-25/67 Almanack 2025/26

The RCC noted and approved the memorandum from the Editor of the Calendar and Secretary to the College/Director of Governance dated 13 May 2025.

RCC/24-25/68 New reporting requirement from the OGP, Circular 09/2024: Reporting on the Use of Centralised Procurement Arrangements

The RCC noted the memorandum from the Deputy Chief Financial Officer dated 14 May 2025.

RCC/24-25/69 Coiste na Gaeilge

The RCC noted and approved the Coiste na Gaeilge minutes of 18 February 2025 and the draft minutes of 7 May 2025.

RCC/24-25/70 Dates of Risk and Compliance Committee Meetings 2025/26

The RCC noted and approved the memorandum from the Secretary to the College/Director of Governance dated 6 May 2025.

RCC/24-25/71 Any other business

The College Solicitor informed the RCC of two points of note raised at a recent meeting of the Global Incident Response Unit as follows:

- Preparations are being made to support students travelling abroad in particular to the US. The USI has urged students to be sensible.

- Alternative funding sources are being sought to support international students whose scholarship funding has been disrupted as a result of policy changes in the US. This applies mainly to students from the School of Medicine.

There were no other items of business.

Signed

A handwritten signature in black ink, appearing to read 'M. Curjel', written on a light blue background.

Date

25 September 2025