



Trinity College Dublin

Coláiste na Tríonóide, Baile Átha Cliath

The University of Dublin

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Minutes of the Risk and Compliance Committee

Wednesday, 4th March 2026, 14.00-15.30

Trinity Board Room

Present: Professor M Cunningham (Chair), Secretary to the College/Director of Governance (V Butler), J Harty, Dr L Kiernan Knowles, College Solicitor (S MacBride), E MacLennan O'Neill, Dr N Ó Murchadha, Academic Secretary (P Maguire), Head of Business Continuity (L Mills), Head of Safety (Dr K Murray), S Anand Saraswati, D Scott, G Woods.

By Invitation: Risk Manager (E O Cinneide)

In Attendance: S Brown (Minute-taker)

Apologies: Chief Operating Officer (N Gorman), A Blair, Professor M Little

RCC/25-26/41 Statements of Interest

There were no statements of interest declared by members.

RCC/25-26/42 New Member's Declaration

The Chairperson invited Lee Mills to make the declaration in the language of her choice.

RCC/25-26/43 Minutes

The RCC approved the draft minutes of the meeting of 20 January 2026.

RCC/25-26/44 Matters Arising

There were no matters arising.

RCC/25-26/45 Callover

The RCC noted the callover dated 20 January 2026.

RCC/25-26/46 Revised Social Media Policy

The Head of Digital Communications, Sharon Campbell, and the Director of Trinity Communications, Áine Griffin, joined the meeting for this item.

The Head of Digital Communications introduced the item with reference to her memorandum and presentation dated 4 March 2026, which had been circulated in advance, under the following headings:

- Why amendments to the social media policy matter now
- Thrive
- Consultation Process
- Scope of the Policy
- Risk Management Framework
- Academic Freedom and Freedom of Expression
- Governance Structure for the Policy
- Implementation and Oversight
- The ask for RCC.

The Chairperson thanked the Head of Digital Communications and opened the item to the floor. In response to an issue raised by a member linked to a real life situation that had arisen, it was agreed that while the revised policy is limited to Trinity-related sites and posts or activities representing the University, a footnote would be added stating that the scope of the policy would not preclude complaints relating to personal use of social media being raised under policies such as dignity and respect, or fitness to practise, or codes of conduct, depending on the context and content of the post.

The issue of including the unions in the consultation process for new and revised policies was raised. Notwithstanding that such consultation is not a requirement, it was agreed that it would be taken into consideration in the future, where appropriate. The Chairperson noted that the unions and students are represented on the Principal Committees and may raise any issues that they consider relevant to their constituencies through the committee structures. The Secretary to the College advised that the consultation process is geared towards the key stakeholders involved in the managing and implementation of the procedures within policies and that the communication piece following approval is key to ensure that all staff and students are aware of the policies in place relevant to them.

In response to a query from a member about the frequency of reviews of controversial platforms such as Tiktok and X, the Head of Digital Communications advised that these platforms were reviewed recently in consultation with colleagues in IT Services and that platforms such as X are being kept under review. The Director of Trinity Communications noted that the position of the University is to respect the academic freedom of the University community, and that any decision by the University to pause or cease use of a social media platform would not be prescriptive; it would be a matter for each area to critically examine the use of a particular platform. It was noted that such concerns are operational and do not form part of the policy.

A number of legal edits were suggested by a member that related to the section on 'Notice and Take Down Procedure' and it was agreed that the member would liaise with the College Solicitor to formulate the changes, and that these would be shared with the Chairperson and with the Head of Digital Communications and with the Director of Trinity Communications.

It was also agreed to incorporate a change suggested by the Head of Business Continuity to address the issue of use of social media as a communications tool in the incidence of an incident, crisis or emergency.

The Head of Digital Communications confirmed that the Irish Language Officer is consulted on the Irish language requirements that pertain to the central Trinity social media accounts.

The RCC recommended the revised Social Media Policy for approval to the Board, pending the inclusion of the legal and other edits. It was agreed that the final, approved version of the policy would come back to the RCC for information.

Actions/Decisions

46.1 Legal edits to be formulated by RCC member and College Solicitor, and shared with the Chairperson of RCC and with the Head of Digital Communications and with the Director of Trinity Communications for inclusion in the revised policy.

46.2 Change suggested by the Head of Business Continuity to be incorporated into the revised policy.

46.3 The RCC approved the memorandum from the Head of Digital Communications dated 4 March 2026 and accompanying revised Social Media Policy and recommended it for approval to the Board, pending the suggested edits being made.

46.4 The final, approved version of the policy to come back to the RCC for information.

Sharon Campbell and Áine Griffin left the meeting at this point.

RCC/25-26/47 Revised Fraud Policy

Anne Marie O'Mullane, Deputy Secretary to the College, joined the meeting for this item.

The Secretary to the College/Director of Governance noted that the review of the Fraud Policy was timely and had addressed an ongoing audit recommendation. She underlined that one of the key changes was to change the title of the policy to 'Anti-Fraud and Anti-Corruption Policy', which more accurately reflected the purpose and scope of the policy.

The Deputy Secretary to the College introduced the item with reference to the memorandum dated 11 February 2026 and presentation dated 4 March 2026 from the Secretary to the College/Director of Governance which had been circulated in advance, under the following headings:

- Anti-Fraud and Anti-Corruption Policy
- Purpose of the Policy
- What changes?
- Definitions
- Clearer Reporting Procedures
- Fraud Response Team
- Reporting
- Consultation.

The Deputy Secretary to the College addressed a query that had been raised in advance by a member regarding the matter of notification of fraud to a third party and advised that under the procedure there was a mechanism for dealing with instances where a report was made to another person, whether it be verbal or written, namely that it should be notified to the Secretary to the College and that the staff member in receipt of the report was advised not to act or engage any further. She noted that if the report was verbal the person receiving the verbal report must notify the Secretary to the College without delay and the Reporting person would be asked to submit a report in writing to the Secretary to the College. She clarified that it would be the Secretary to the College who would make this request.

The Deputy Secretary to the College advised that additional feedback had been provided from a member who had raised concerns regarding the challenges presented by anonymous disclosures, including to the investigation process, and the risk of delay, and the need to encourage anonymous individuals to come forward, as well as the potential cross-over with Protected Disclosures. She advised that the University's Protected Disclosures Policy provided a clear reporting mechanism in order to ensure that the reporting person availed of the protections under the policy. She reported that cases may be routed into the Fraud Policy from the Protected Disclosures Policy and that this was addressed in the Protected Disclosures Policy. She underlined that the onus was on each and every individual at the university to report potential fraud or corruption as soon as they became aware of it and that not to do so would in fact constitute a breach of the policy. She noted that the matter of penalisation was addressed within the policy to support the reporting person in coming forward.

A member of RCC raised again the issue of consultation on the policy with the unions. The Secretary to the College/Director of Governance clarified that the nature of the Fraud Policy was such that the majority of staff and students would not need to use the policy and that it was important that consultation focused on those stakeholders who would be managing the procedure. She noted that consultation with the unions takes place when it was meaningful and appropriate to do so. The Deputy Secretary to the College advised that external legal advice had been sought to ensure that the fraud policy did not infringe on any disciplinary aspect. The College Solicitor noted that in this instance, wide consultation would not have been meaningful given the limited capacity for the policy to be bespoke given that the procedure must adhere to the requirements of national legislation. Attention was also drawn to the legislative reporting requirements for fraud under criminal law as well as sectoral oversight reporting requirements under the HEA Act 2022. As such, she noted that, given the complexities of the area, the priority with this policy was to ensure that the procedure met those vital requirements and the procurement of external expert legal advice had been sought to give the University assurance in this regard.

Gavin Woods left the meeting at this point.

Action/Decision

47.1 The RCC approved the memorandum from the Secretary to the College/Director of Governance dated 11 February 2026 and accompanying revised Fraud Policy (Anti-Fraud and Anti-Corruption Policy) and recommended it for approval to the Board.

RCC/25-26/48 Revised Child Protection Policy

Anne Marie O'Mullane, Deputy Secretary to the College, remained in the meeting for this item.

The Deputy Secretary to the College introduced the item with reference to the memorandum from the Secretary to the College/Director of Governance dated 11 February 2026 which had been circulated in advance and summarised the key changes to the revised policy.

In response to feedback that had been submitted by a member in advance, the Deputy Secretary to the College informed the Committee that on the dedicated Child Protection Policy webpage on the Policies Hub, separate downloads for each of the appendices would be listed, in addition to links to two documents that would list relevant policies and provide a compliance checklist for those at Trinity who organise Transition Year placements. The Deputy Secretary to the College provided details on the training offered to relevant staff and advised that that the training was organised through the College Secretary's Office annually or as required.

The Deputy Secretary to the College advised that each area working with children was expected to have their own child safeguarding statement in place, updated every two years in line with the University's child safeguarding statement, which reflected the principles and procedures to be observed in order to ensure, as far as practicable, that a child availing of the service was safe from harm. In response to a query from a member she confirmed that as part of the review of the child protection risk register every two years, key areas would be asked to provide a copy of their safeguarding statements to the Secretary's Office to verify that statements were kept updated as required by the legislation.

Action/Decision

48.1 The RCC approved the memorandum from the Secretary to the College/Director of Governance dated 11 February 2026 and accompanying revised Child Protection Policy, and recommended it for approval to the Board.

RCC/25-26/49 New Conflict of Interest Policy

Anne Marie O'Mullane, Deputy Secretary to the College, remained in the meeting for this item.

The Deputy Secretary to the College presented the item with reference to the memorandum dated 11 February 2026 and presentation dated 4 March 2026 from the Secretary to the College/Director of Governance which had been circulated in advance, under the following headings:

- Conflict of Interest Policy
- Purpose of the Policy
- Definitions
- Self-Declaration Procedure
- 4 Steps in dealing with Conflicts of Interest
- 1. Determining a Conflict of Interest
- 2. Declaring a Conflict of Interest
- Bespoke Processes

- 3. Reviewing and Managing the Conflict of Interest
- 4. Recording and Reporting on Conflicts of Interest
- Breach of Policy
- Appeal
- Consultation.

Noel Ó Murchadha left the meeting at this point.

In response to a suggestion, it was agreed that it would not be desirable or feasible to introduce a requirement for all staff to sign a declaration of no conflicts of interest.

Patricia Maguire left the meeting at this point.

Following discussion it was agreed that consideration would be given to the provision of appropriate training that would provide additional guidance to staff. It was noted that guidance would be provided through a set of examples, FAQs and a powerpoint presentation that would be hosted on a dedicated conflict of interest policy webpage on the Policies Hub.

Action/Decision

49.1 Consideration to be given to the provision of appropriate training to provide additional guidance to staff on the Conflicts of Interest Policy.

49.2 The RCC approved the memorandum from the Secretary to the College/Director of Governance dated 11 February 2026 and accompanying Conflict of Interest Policy and recommended it for approval to the Board.

RCC/25-26/50 Revised Ethics Policy

Anne Marie O’Mullane, Deputy Secretary to the College, remained in the meeting for this item.

The Deputy Secretary to the College introduced the item with reference to the memorandum from the Secretary to the College/Director of Governance dated 11 February 2026 which had been circulated in advance. She noted that the changes made to the policy were minor, and were made to align it to the Code of Practice for the Governance of State Bodies 2016, as well as including reference to the Code of Conduct for Members of the Board and of Principal Committees of Board, the Code of Conduct for Employees and the new Conflict of Interest Policy (pending its approval).

Action/Decision

50.1 The RCC approved the memorandum from the Secretary to the College/Director of Governance dated 11 February 2026 and accompanying revised Ethics Policy and recommended it for approval to the Board.

RCC/25-26/51 Annual Governance Statement 2024/26

Anne Marie O’Mullane, Deputy Secretary to the College, remained in the meeting for this item.

The Deputy Secretary introduced the item with reference to her and the Secretary to the College/Director of Governance's memorandum dated 24 February 2026 which had been circulated in advance.

In response to a query from the Chairperson regarding whether there was any timescale associated with certain items where the University indicated that it was 'working towards' compliance, the Secretary to the College/Director of Governance clarified that this was often due to insufficient funding being available to reach compliance but that nonetheless, the long term plan was to achieve compliance. In response to the issue of the importance of communicating such funding shortfalls at a high-level, the Secretary to the College advised that this is being communicated at IUA-level.

Action/Decision

51.1 The RCC approved the memorandum from the Deputy Secretary and Secretary to the College/Director of Governance dated 24 February 2026 and accompanying Annual Governance Statement 2024/25 and recommended it for approval to the Board.

The Deputy Secretary to the College left the meeting at this point.

RCC/25-26/52 Revised Business Continuity Management Policy

The Head of Business Continuity, Lee Mills, introduced the item with reference to the memorandum from the Chief Operating Officer dated 18 February 2026 which had been circulated in advance. She noted that the changes to the policy were minor.

In response to a suggested change, the Head of Business Continuity undertook to make a revision to the wording linked to risk management.

In response to feedback that had been submitted in advance by a member, she agreed that testing would be vital and that she would keep it in mind for future work and discussions on exercising and testing approaches. In response to a query from the Chairperson regarding whether any testing exercises were planned in the near future, she confirmed that a crisis management team workshop would be held on 10th March and a major incident team workshop would be held on 19th March. Each workshop session will include scenario exercising for the teams. The outcomes from the workshops would determine whether the Crisis and University Major Incident Management Plan would need any further revision, and if amendment is required to the plan then, in the following 6 months, further exercises to test the revised plan involving the relevant team members would be scheduled. She undertook to provide a summary of those events and planned outcomes to the Chairperson for him to provide an update to the Board.

Action/Decision

52.1 An edit to be made to the revised Business Continuity Management Policy linked to risk management.

52.2 The Head of Business Continuity to provide a summary of the workshops and planned outcomes to the Chairperson of RCC to provide an update to the Board.

52.3 The RCC approved the memorandum from the Chief Operating Officer dated 18 February 2026 and accompanying revised Business Continuity Management Policy and recommended it for approval to the Board.

RCC/25-26/53 Coiste na Gaeilge

The RCC noted and approved the draft minutes of 9 February 2026.

RCC/25-26/54 Safety Committee

- (i) The RCC noted and approved the draft minutes of 15 December 2025.
- (ii) The RCC noted and approved the Safety Committee Annual Report 2024/25.

RCC/25-26/56 Any other business

There were no other items of business.

The next meeting of the RCC will take place on Thursday 21 May 2026 at 14.00 in the Trinity Board Room.

Signed



Date

21 May 2026