



**Trinity College Dublin  
The University of Dublin**

**Minutes of the Risk and Compliance Committee**

**Wednesday, 5<sup>th</sup> March 2025, 14.00-15.30**

**Trinity Board Room**

- Present:** Professor M Cunningham (Chair), Secretary to the College/Director of Governance (Ms V Butler) (Secretary), Mr A Blair, Academic Secretary (Ms P Callaghan), Chief Risk Officer (Ms J Carmichael), Chief Operating Officer (Ms O Cunningham), Mr J Harty, Dr L Kiernan Knowles, Head of Safety (Dr K Murray), Ms E MacLennan O'Neill, Mr S Anand Saraswati, Mr D Scott.
- In Attendance:** Ms S Brown (Minute-taker).
- Apologies:** Professor N Ó Murchadha, College Solicitor (Ms S MacBride), Mr G Woods, Professor J Gilmer.
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**RCC/24-25/43 Statements of Interest**

There were no statements of interest declared by members.

**RCC/24-25/44 Minutes**

The RCC approved the draft minutes of the meetings of 5 and 18 February 2025.

**RCC/24-25/45 Matters Arising**

There were no matters arising.

**RCC/24-25/46 Callover**

The RCC noted the callover dated 18 February 2025.

**RCC/24-25/47 Artificial Intelligence: Opportunities, Risk and Compliance Issues**

*Professor Vincent Wade, Senior Lecturer/Dean of Undergraduate Studies joined the meeting for this item.*

The Chairperson welcomed Professor Vincent Wade to the meeting noting that the Board had asked that the Risk and Compliance Committee would get an understanding of the risks and opportunities associated with Generative AI and its impact on teaching and research.

Professor Wade introduced the item with reference to his presentation dated 5 March 2025 which had been circulated in advance, under the following headings:

- The current state of adoption
- The current role of Generative AI in Education
- Risks and Challenges
- Adoption Strategies and Future Directions.

He also advised the Committee that a steering group on AI has been established of which he is the Chair and the Secretary to the College is Deputy Chair and that the University had issued recently a statement on AI and Generative AI in Teaching, Learning, Assessment and Research. He informed the Committee that a University Strategy and Policies will be developed in due course.

The Chairperson thanked Professor Wade for his comprehensive and informative presentation and opened the item to the floor for questions. In response to a query from a member of the RCC, Professor Wade advised that in the context of procurement and use of Generative AI by vendors, it would be prudent to put in place safeguards such as checklists for staff and to provide them with relevant training (which is also a requirement by the AI Act). Prof Wade noted that AI awareness is a basic requirement of the AI Act for all employees as well as governance committees/boards.

Concern was expressed about the potential risks that the use of Generative AI presents in the higher education sector, such as lack of transparency, bias, misinformation and reputation, and whether the EU is overregulating, and the difficulty of deciding where to position the university within that sphere. Professor Wade advised that the dilemmas facing Trinity are shared by all universities and that mutual support is provided through networks such as LERU. He noted that whereas in private enterprise Generative AI is used for finding solutions, in universities where students are being trained and educated to be critical thinkers and to critically evaluate in order to arrive at a solution, it is vital to introduce Generative AI in such a way as to support students in developing their own answers rather than providing them with the answers. With regard to processing student coursework and submitted assessments using GenAI tools, existing GDPR legislation regards such content as private information (of the students) and must therefore not be uploaded to third party Generative AI tools for processing without the students consent or only where the third party tool has strict licencing agreement with Trinity (as is the case with other teaching tools used by the University e.g. Blackboard, Turnitin, Panopto etc.). The GenAI Act also recognises Education as a 'high risk' application area which will be subject to regulation as part of the implementation of the AI Act. For example Generative AI would need human oversight and intervention if used to automate student work assessment and policies for such work will need to be developed by the University in this regard. He observed that despite some commentators' concern about regulation hindering innovation, some EU regulation is essential to oversee GenAI application. Currently this AI legislation focuses on data used and its curation as well as the application areas for such use.

*Mr Anand Saraswati joined the meeting at this point.*

With regard to providers of AI, Professor Wade noted the importance of building up skills in how to use it and of creating space to trial the application of GenAI on key aspects in teaching,

research and administration/professional management. He considered that Trinity could be a leader in the field of AI in Higher Education. In response to a query regarding whether AI will be part of the digital transformation strand in the next strategic plan, Professor Wade affirmed that AI/GenAI is a part of the digital transformation strategy and that the strategy is intended to imbue AI digital affordances across education, research and administration. He advised that this requirement would represent a significant financial cost. With regard to sustainability concerns associated with the energy consumption required to support Generative AI, Professor Wade noted that there is a strong emphasis on developing Green AI techniques in Europe that focused on reducing the processing required (and size of) GenAI models and required infrastructure.

The RCC agreed with the recommendation from Professor Wade that it would be important for training to be provided for the Board as it is vital for the Board to have a full understanding of the risks and opportunities associated with Generative AI for Trinity.

The Chairperson closed the item by thanking Professor Wade.

#### **Action/Decision**

**47.1** The RCC received the presentation from the Senior Lecturer/Dean of Undergraduate Studies dated 5 March 2025.

**47.2** The RCC recommended to the Board that training be provided to the Board so that they have a full understanding of the risks and opportunities associated with Generative AI for Trinity.

*Professor Wade left the meeting at this point.*

#### **RCC/24-25/48 Draft University Risk Appetite Statement**

The Chief Risk Officer introduced the item with reference to her memorandum dated 2 February 2025 which had been circulated in advance. She noted that the Risk Appetite Statement will be reviewed annually and that there is still work outstanding on compiling a key risk indicator programme which will need to accompany the Risk Appetite Statement.

A member of RCC queried the reference to the requirement for ongoing investment in teaching and learning infrastructure and why it was included for just teaching and learning. It was clarified that this had been included following lengthy discussion and consideration at EOG.

The RCC noted the importance of using the Risk Appetite Statement to inform decision-making and to raise awareness of it across the University.

There was consensus that while recognizing that the no tolerance risk category is difficult to measure and does not allow for human error, nonetheless it should be included in the table in Appendix 2 (given that it is referenced within the document), alongside the low risk category (i.e., No/Low). The Chief Risk Officer undertook to include this for Board. It was noted that this is a living document and will need to be reviewed once the new strategic plan has been developed.

The RCC approved the University Risk Appetite Statement and recommended it for approval to the Board.

**Action/Decision**

**48.1** The RCC approved the memorandum from the Chief Risk Officer dated 2 February 2025 and accompanying Risk Appetite Statement and recommended it for approval to the Board.

**RCC/24-25/49 Interdependency Map and Risk Collision Scenarios**

The Chief Risk Officer introduced the item with reference to her presentation dated 5 March 2025. She noted that this was an early attempt to provide an overview of the six high-level risks and their interconnectivity, the nature of that interconnectivity, the materiality of risks and the methodology used. The Chairperson noted that in order to produce a full interdependency map, there was a dependency on having sufficient data available that would underpin it. The Chief Risk Officer informed the RCC of the challenges that this presented in light of the available resources in the Risk Office and the volume of work that would be required to pull this data from across the university. Following discussion it was agreed that Board should be informed of the plan for developing the interdependency map and that a timeline would follow. However as noted by the CRO, further work on the University Risk Register action plans would be required to support accurate interdependency modelling.

**Action/Decision**

**49.1** The RCC noted the presentation from the Chief Risk Officer dated 5 May 2025.

**49.2** The Board is to be informed of the plan for developing the interdependency map and that a timeline will follow, noting however, that further work on the University Risk Register action plans will be required to support accurate interdependency modelling.

*Ms Callaghan left the meeting at this point.*

**RCC/24-25/50 Annual Governance Statement**

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

Ms O'Mullane introduced the item with reference to her memorandum and presentation dated 28 January 2025 which had been circulated in advance. She summarised the background to the Annual Governance Statement, and the approach to preparing the statements. She drew the RCC's attention to the assurances that would be sought from the Board.

The RCC noted and endorsed the assurances for consideration by the Board for confirmation. The RCC further noted and endorsed for consideration by the Board the draft Annual Governance Statement for 2023/24 for approval and submission to the HEA.

**Action/Decision**

**50.1** The RCC approved the memorandum dated 28 January 2025 from the Deputy Secretary and the Secretary to the College.

**50.2** The RCC noted and endorsed the assurances for consideration by the Board for confirmation.

**50.3** The RCC further noted and endorsed for consideration by the Board the draft Annual Governance Statement for 2023/24 for approval and submission to the HEA.

*Ms O'Mullane left the meeting at this point.*

**RCC/24-25/51 Quality: Assurance, Compliance and Governance**

The Secretary to the College/Director of Governance introduced the item with reference to the memorandum from her and the Vice-Provost/Chief Academic Officer dated 24 February 2025. She summarised the proposal to separate the quality function between the Academic Services Division (overseeing all aspects of quality assurance and enhancement of the quality function and associated reporting linked to education and research) and the Secretary's Office (overseeing the compliance aspects of the quality function and all non-academic quality reviews and required reporting).

**Action/Decision**

**51.1** The RCC noted and approved the memorandum from the Secretary to the College/Director of Governance and Vice-Provost/Chief Academic Officer dated 24 February 2025 and recommended it for approval to the Board.

*Ms MacLennan O'Neill left the meeting at this point.*

**RCC/24-25/52 Revised Protected Disclosures (Whistleblowing) Policy**

The Secretary to the College/Director of Governance introduced the item with reference to the memorandum from her and the College Solicitor dated 24 February 2025 which had been circulated in advance. She noted that the purpose of the memorandum was to flag to the RCC that the Protected Disclosures (Whistleblowing) Policy has been revised in light of changes to the protected disclosures legislation and that it was planned to bring the revised policy forward to RCC for consideration and approval in May. Given the complexity and length of the revised policy, members were asked to read it when circulated and to submit questions in advance so that the appropriate expertise would be present at the meeting to address these.

**Action/Decision**

**52.1** The RCC noted the memorandum from the Secretary to the College/Director of Governance and College Solicitor dated 24 February 2025.

**RCC/24-25/53 Risk and Compliance Committee Annual Report 2023/24**

The RCC approved the Risk and Compliance Committee Annual Report 2023/24 for Board for onward consideration and approval by the Board.

**RCC/24-25/54 Audit Recommendations Log Management Update**

The RCC noted the Audit Recommendations Log Management Update dated February 2025.

**RCC/24-25/55 Associated Companies Directors' Reports**

The RCC noted and approved the memorandum from the Secretary to the College/Director of Governance dated 27 January 2025 and accompanying Associated Companies Directors' Reports.

**RCC/24-25/56 Coiste na Gaeilge**

The RCC noted and approved the Coiste na Gaeilge minutes of 25 November 2024.

**RCC/24025/57 Any other business**

- (i) The Secretary to the College/Director of Governance informed the RCC about a confidential financial matter that had been investigated and that had resulted in no material impact to the University and advised that she will keep the RCC updated.
- (ii) The Chairperson noted that this was the last meeting of the current Chief Operating Officer, Ms Orla Cunningham, before she finished in the role due to retirement. He thanked her for her contributions to the RCC and there was a round of applause.

The next meeting of the RCC will take place on Thursday 22<sup>nd</sup> May 2025 at 10.00 in the Trinity Board Room.

Signed



Date

22 May 2025