



Audit Committee, Thursday 06 June 2024

The meeting was held in the Trinity Board Room

Present Ms M Fulton (Chair), Ms R Mathews-McKay, Professor R Reilly, Ms B Collins (By Zoom)

Apologies Professor P Murphy

(ex officio) Internal Auditor/Secretary (Ms F McAuliffe), Secretary to the College/Director of Governance (Ms V Butler)

In Attendance Deputy Internal Auditor (Ms A Cooney), Ms M Thompson

Ms C McDermott and Ms K Litwinowicz of Deloitte attended for item AD/23-24/61

The Chief Risk Officer (Ms J Carmichael) attended for item AD/23-24/62

(Items of specific interest to the Board are denoted by **XXX**)

AD/23-24/54 Statements of Interest

The Chair invited members to declare any potential conflict of interest they may have in relation to items on the Agenda. There were no conflicts of interest declared by members.

AD/23-24/55 Minutes

The draft minutes of 14 March 2024 were approved.

AD/23-24/56 Call-over

The Committee noted the actions which had been implemented since the previous meeting and those that remained outstanding.

AD/23-24/57 Matters Arising

The Internal Auditor advised members that a new Senior Internal Auditor, with extensive experience in the public sector, has recently joined the Internal Audit team.

The Internal Auditor noted that a review of the Fraud Policy is currently being undertaken by the Chief Risk Officer. As part of the stakeholder engagement with this process Internal Audit noted some key control gaps and the aspirational nature of the updated draft documents and provided significant feedback to the CRO and College Secretary.

Section A and Section B – Policy and Implementation Issues

AD/23-24/58 Audit of the Senior Tutor Office – Financial Support Management

The Chair invited the Internal Auditor to brief the Committee on the findings of the Audit of the Senior Tutor Office – Financial Support Management, which had been circulated.

Introducing the Report, the Internal Auditor advised that the Senior Tutor Office (“the STO”), is part of the Academic Services Division, which supports and co-ordinates the Tutorial Service and the Postgraduate Advisory Service. As part of its remit the STO administers financial support to students and rewards academic tutors via the Tutorial System Support Fund (TSSF). The Internal Auditor advised that the purpose of the audit was to assess the adequacy and effectiveness of internal controls in place for the Senior Tutor Office Financial Support Management. However, the Internal Auditor advised that it was not possible to fully complete the audit work as originally planned due to ongoing resource issues in the area and, as a result, could not conclude on the specific control objectives and can provide no assurance in relation to the design and effectiveness of the current control environment.

The Internal Auditor noted that it appears that resource issues were impacting on the effective operation of controls in the area and that during the course of the fieldwork management had advised of a specific control failure which had resulted in a small number of duplicate payments.

While the planned fieldwork was unable to be completed the Internal Auditor summarised two key findings that were identified during the limited fieldwork for the Committee, noting the following recommendations had been agreed with management:

- **Support Financial Assistance**
It is recommended that the Chief Academic Officer, in conjunction with the Senior Tutor, undertake an immediate review of the capacity of the Senior Tutors Office to operate the student financial assistance services to the appropriate standard and identify appropriate actions to ensure services can be delivered within an appropriate and timely manner for students.
- **Tutorial Support Services Fund**
It is recommended that the Senior Tutor develop and implement appropriate processes for the administration of the Tutorial Support Services Fund as matter of priority. The documented processes should incorporate appropriate controls including appropriate oversight and segregation of duties. The report also recommends that the Senior Tutor should ensure there is appropriate cross-training for administration of the TSSF across the team.

The Internal Auditor confirmed that it had also been agreed with the Senior Tutor and the Vice Provost / Chief Academic Officer that Internal Audit would also provide a summary of observations noted during the fieldwork in the hope that these would be of assistance in improving the internal control framework for financial support activities.

The Committee noted that Internal Audit have committed to re-visit the STO Financial Support processes as part of the comprehensive, risk-based planning process for the development of future Internal Audit Plans with the expectation of a follow up audit in 2025.

During a subsequent discussion, the Internal Auditor responded to a number of queries from members in relation to the Report's findings.

In conclusion the Committee agreed the Audit of Senior Tutors Office – Financial Assistance Management Report as presented and noted that Internal Audit intend to conduct future work in area to complete the audit work.

AD/23-24/59 Audit of the Global Relations 3 Strategy

Introducing the Report, the Deputy Internal Auditor advised that the GRS 3 Strategy is the third dedicated Global Relations Strategy which the University has pursued and was initiated in February 2019 after approval by Board in December 2018.

The Deputy Internal Auditor advised that the purpose of the Audit is to assess the adequacy and effectiveness of the internal control framework for the Global Relations 3 Strategy (GRS) and advised that the audit includes an assessment of the level of assurance that can be provided to the Audit Committee in relation to the internal control framework. The Committee noted that the scope of the audit includes all processes, policies and procedures in place as at February 2024 in relation to the GRS 3 Strategy.

The Deputy Internal Auditor summarised the key findings identified during the audit for the Committee, noting the following recommendations had been agreed with management:

- It is recommended that the Global Engagement Committee should update their Terms of Reference formally to reflect the current operation and reporting structures of the Committee.
- It is recommended that Trinity Global continue to review and document the process for each category of scholarship and bursary, from review and consideration of each application through to the approval and payment of the award. The review should ensure that the processes are appropriately designed to provide evidence of transparent review of each application and support the decision made for each award.

During a brief discussion, the Deputy Internal Auditor responded to a number of queries from members.

The Deputy Internal Auditor advised that based on the results of work undertaken during the audit, Internal Audit can provide moderate assurance to the Committee in relation to the design and effectiveness of the current control environment, noting that some opportunities for improvement were identified.

In conclusion, the Committee agreed the Audit of Global Relations 3 Strategy Report as presented and welcomed the positive responses to the report's recommendations by management.

AD/23-24/60 Update from the College Secretary / Director of Governance

The Committee noted the memorandum from the Secretary to the College dated 04 June 2024, which had been circulated.

Introducing the item and as agreed at the Audit Committee on 13 February 2023, the Secretary to the College briefed members on measures implemented by management in relation to operational matters identified in reports from Internal Audit completed in July / August 2023. The Secretary to the College also provided a verbal update to members on a specific matter and outlined management's progress to-date. She noted that the Incident Team is due to meet shortly, is currently considering the appropriate approach to the matter and is taking legal advice to ensure the appropriate process is followed.

During a subsequent discussion, the Secretary to the College responded to a number of queries from members. In particular, the Committee noted that management had noted some suggested actions would not be completed for varying reasons and requested that the Secretary to the College bring these suggested actions, with the appropriate context, to the attention of the Risk & Compliance Committee so that any residual risks can be evaluated.

Action:

60.1 The Secretary to the College/Director of Governance to bring the suggested actions and potential associated risks to the attention of the Risk & Compliance Committee.

The Secretary to the College/Director of Governance withdrew by invitation for the following Agenda item.

AD/23-24/61 Audit of the Data Protection Framework to Support University Compliance with Health Research Regulations

The Chair welcomed Ms McDermott and Ms Litwinowicz of Deloitte to the meeting, noting that Deloitte were appointed as co-sourced Internal Audit providers in February 2023.

Introducing the item, the Internal Auditor advised that the Report on the Audit of the Data Protection Framework to Support University Compliance with Health Research Regulations is still in draft form and will be circulated to the Committee when complete. The Internal Auditor advised that a difference of opinion has arisen between Internal Audit and management in relation to the report's findings and recommendations and it was decided to provide a verbal update to the Committee at this time. The Internal Auditor informed members that while draft management responses were received on 30 May 2024, these were extensive in nature and a meeting is currently being scheduled to discuss the responses and progress the report.

Commenting on the audit, Ms McDermott advised members that the purpose of the audit was to assess the adequacy and effectiveness of internal controls in place around data protection framework to support University compliance with the Irish Health Research Regulations (HRR). The Committee noted that the scope of the audit included all processes, policies and procedures in place as at September 2023 in relation to the data protection framework to support University compliance with HRR. Ms McDermott advised that a sample of fifteen individual research projects were selected to review and of these five projects were selected for detailed testing.

Ms McDermott advised that the policy on good research practice sets out the principles of good research which all researchers across the University are required to comply. Ms McDermott informed the Committee that following a review of documentation for a number of health research projects, they identified instances of apparent misunderstanding of definitions and principles defined under GDPR. Ms McDermott advised that during the audit they observed differing approaches to data protection for health research projects, including varying versions of the Data Protection Impact Assessment (DPIA) used across the fifteen projects reviewed and a lack of clarity and consistency in relation to the gathering and of consent and provision of information to participants.

During a detailed discussion, Ms McDermott and Ms Litwinowicz noted that there are currently 7 recommendations in the draft report ranging from high to medium and responded to a number of queries members on the audit findings. One member of the Committee welcomed the draft findings from the audit and noted that they resonated with their experience, particularly in the context of research projects, within the University in relation to data protection advice.

Ms McDermott confirmed that all documentation provided by management during the fieldwork had been reviewed by Deloitte subject matter experts in reaching their conclusions, which are reflected in the findings in the draft report.

The Internal Auditor advised that based on the results of the internal audit work undertaken in relation to the data protection framework to support University compliance with Health Research Regulations, Internal Audit envisages providing limited assurance and significant opportunities for improvement have been identified.

In conclusion, the Committee strongly recommended that management engage meaningfully with the internal audit process with a view to finalising the Data Protection Framework Report without any further delay.

The Chair thanked Ms McDermott and Ms Litwinowicz of Deloitte for their contribution to discussions and they withdrew from the meeting.

The Secretary to the College/Director of Governance rejoined the meeting.

On re-joining the meeting, the Secretary to the College / Director of Governance confirmed that the Data Protection Office was within her remit, and she commented on the status of the audit and the significant differences of opinion between the Deloitte audit team and management. The Committee noted the points raised and confirmed that, while there may be differences of opinion, Deloitte had been asked to provide their professional opinion based on relevant expertise which should be reflected within the audit report with management given the opportunity to provide appropriate responses.

Action:

61.1 The Internal Auditor to communicate the Committees' recommendation for management to engage with the internal audit process with a view to finalising the Report without any further delay.

AD/23-24/62 University Risk Register

The Chair welcomed the Chief Risk Officer to the meeting for consideration of the University Risk Register. The Committee noted the memorandum dated 30 May 2024 from the Chief Risk Officer, together with the Risk Register High Risk Summary and Overview for 2023-2024, which had been circulated.

The Chief Risk Officer advised that the Risk Register High Risk Summary and Overview was reviewed and recommended for approval by the Risk and Compliance Committee on 9 May 2024 and approved by Board on 22 May 2024 and is now presented to the Audit Committee for noting.

The Chief Risk Officer advised that the Risk Register High Risks Summary and Overview 2023-2024 outlines the top six risks. The Chief Risk Officer advised that these risks have been rated at a 20 residual risk rating with mitigation actions included in the presentation to outlined additional actions which are being taken to further reduce the residual risk ratings.

The Committee noted that the remaining medium and low risks included in the full University Risk Register 2023 2024 will be presented to the Risk and Compliance Committee at its June meeting.

The Chief Risk Officer summarised the top risks currently facing the University. In particular, the Chief Risk Officer reported that the main trends in the Risk Register include those related to external threats which include the impact of disruptive technology such as artificial intelligence on academic integrity, inflationary pressures impacting capital project costs, ongoing climate change events, together with the continued impact of underfunding in the University sector.

During a subsequent discussion, the Chief Risk Officer responded to a number of queries from members in relation to individual Risks together with actions being taken to mitigate the risks.

In conclusion, the Committee noted the presentation on the University Risk Register as presented.

The Chair thanked the Chief Risk Officer for the update on the Risk Register and she withdrew from the meeting.

AD/23-24/63 Update on Internal Audit Annual Plan

The Internal Auditor drew the Committee's attention to the update on the Internal Audit Annual Plan, which had been circulated. Noting that the Annual Plan had been approved by the Committee in December 2023, the Internal Auditor briefed the Committee on the status of audit assignments as of June 2024.

The Internal Auditor advised members that the Plan is on track to be completed by the end of the year as planned. In particular, the Internal Auditor drew the Committee's attention highlighted key themes identified during the work of Internal Audit over the period covered by the Plan.

The Internal Auditor reminded the Committee, that as with all plans, the Internal Audit Annual Plan is fluid and dynamic. The Internal Auditor advised that as part of the update, Internal Audit had considered the appropriateness of assignments and potential emerging risks, and this will continue to be assessed on an ongoing basis.

The Internal Auditor advised that she is satisfied with progress on the Audit Annual Plan to-date for 2024 and progress is in line with the schedule agreed with the Audit Committee.

The Committee noted the update on the Audit Annual Plan for 2024.

AD/23-24/64 Audit Committee Self-Evaluation

The Internal Auditor drew the Committee's attention to the results of the Committee's recent Self-Evaluation exercise, which had been circulated. The Internal Auditor thanked members for taking the time to engage with the self-evaluation process and noted that members' overall assessment of the performance of the Committee is reasonably positive and in line with previous self-evaluation exercises.

Due to the small number of respondents, the Committee noted that a single score can have a significant impact on the overall rating and consequently care needs to be taken in comparing results.

In considering the detailed responses within the report, the Committee noted that there are some areas where scope for improvement has been identified by individual members. In particular, the Committee recommended that potential opportunities for training for members be explored, including training relevant to their role in relation to the University's Financial Statements.

In conclusion, the Committee noted the results of the self-evaluation process.

Action:

64.1 The Internal Auditor to liaise with the Secretary to the College/Director of Governance in relation to training for members particularly in relation to their role in reviewing and recommending the Financial Statements for approval.

AD/23/24/65 Audit Committee Meeting Schedule

The Internal Auditor drew the Committee's attention to a draft meeting schedule for 2024-2025, which had been circulated. The Internal Auditor reminded members, that while there is some flexibility, the dates are synchronised with the meeting and circulation dates of Board, Council and Finance Committees and the approval cycles of the financial statements. The Internal Auditor invited members to consider the schedule and to advise if they had difficulties with any of the dates. The Committee noted the meeting schedule as presented.

Action:

65.1 The Internal Auditor to circulate the meeting schedule for 2024/2025 to members and relevant stakeholders for noting in their diaries.

Section C – For Noting

AD/23-24/66 Audit Committee Annual Report to Board

The Committee noted the Audit Committee's Annual Report to Board for 2023/2024, which had been presented to Board on 27 March 2024.

AD/23/24/67 Management Letters

The Committee noted the PwC and C&AG Management Letters for the year ended 30 September 2023, which had been circulated for noting.

AD/23-24/68 Risk and Compliance Committee Minutes

The Committee noted the Risk & Compliance Minutes of 06 March 2024, which had been circulated for noting.

AD/23-24/68 Board Papers

The Committee noted the Board Agendas and Board Minutes, which had been circulated for noting.

AD/23/24/69 Any Other Business

Under Any Other Business, the Committee extended its deep appreciation to Ms Mary Fulton and Professor Richard Reilly who were attending their last meetings as members of the Committee. Members thanked them for their very significant and unstinting work in support of the Audit Committee and the significant contribution they made to the work of the Committee over the period of their respective membership terms.

In particular, the Committee thanked Ms Fulton for acting as Chair of the Committee for 2023/2024. The Committee wished Ms Fulton and Professor Reilly well for the future.