



Trinity Development & Alumni

Risk Appetite Statement

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Trinity Development & Alumni Risk Appetite Statement

Trinity Development & Alumni's (TDA) approach is to minimise its exposure to reputational, compliance and excessive financial risk, whilst accepting and encouraging more risk in pursuit of its strategic objectives. It recognises that its appetite for risk varies according to the activity undertaken and indeed varies within activities. TDA's acceptance of risk is subject always to ensuring that potential benefits and risks are fully understood before developments are authorised, and that sensible measures to monitor and mitigate against risk are established. The purpose of the **Risk Appetite Statement** is to provide TDA staff with broad-based guidance on the amount and type of risk the organisation is willing to accept to achieve its objectives and mission.

TDA's appetite for risk across its activities is detailed in the following table:

Risk Category	Risk Appetite Level
Fundraising & Alumni Engagement	Moderate
Reputation	LOW
Compliance	LOW
Financial	LOW
People & Culture	LOW
Operations	LOW
Information Technology Risk	ZERO-LOW
Environment, Social and Governance	LOW

1. Fundraising & Alumni Engagement

Overall Risk Appetite: Moderate

Definition

TDA is charged with responsibility for, and exists solely to support, the fundraising and alumni relations activities of the University. It has goals to raise philanthropic funds for University priorities, strengthen links with alumni and provide a range of support services to the University, its Schools, alumni, students, and friends.

Overview

The support of our alumni and supporters, both financial and through their volunteering, is critical to enable the University to achieve its strategic mission. TDA have set ambitious fundraising targets in support of the University's mission, and we strive to create a relevant, impactful, and life-long relationship with our alumni.



We recognise that there will be an increased degree of risk in developing innovative ways of fundraising and alumni engagement and have a **MODERATE to HIGH - risk appetite** in this area. We are committed to promoting a culture of innovation where staff are encouraged to develop new ideas and in recognising that we operate in a complex environment, that often many solutions may exist which require a degree of experimentation with the risk of failure.

However, in accepting this risk around innovative behaviour we will ensure that appropriate and adequate controls and risk mitigations are in place across the organisation. In the area of compliance with ethical fundraising standards and safeguarding TDA's and the University's reputation we have a **LOW tolerance** for risk.

WE WILL:

- (i) ensure that all fundraising and alumni engagement activities are carried out in line with the highest ethical standards and in particular in compliance with the University Gift Acceptance and Ethics Policy
- (ii) ensure all such activities are conducted in line with our values
- (iii) ensure that all activities and projects are adequately risk assessed and monitored so as to deliver value for money
- (iv) create a culture which promotes agility, innovation and excellence amongst our staff while maintaining accountability and risk management

2. Reputation

Overall Risk Appetite: Low

Definition

Reputational Risk refers to events or circumstances that could potentially compromise TDA or Trinity College Dublin's prestige or credibility with alumni, supporters, students, State Bodies, or other stakeholders.

Overview

Our reputation among key stakeholders has a profound and direct impact on our capacity to achieve our mission and it is regarded as critical that TDA preserves its high reputation. TDA, therefore has a low appetite for risk in any activity that might jeopardise our reputation, lead to adverse publicity, or erode the confidence of our alumni, funders, and supporters. Reputational risk is inherent in all aspects of our operations, spanning our interactions with potential donors, the quality of our events and communications, and the overall conduct of TDA's business in compliance with relevant laws and regulations. We are therefore committed to operating to the highest ethical standards and to being open and transparent in all of our business activities.

WE WILL:

- (I) hold our staff to the highest level of ethical and professional standards and address any weaknesses in enforcement of rules of ethical professional conduct.
- (II) Avoid activities that would reflect negatively on the reputation of TDA or the University
- (III) Carry out appropriate due diligence on the source of all donations received
- (IV) Train staff to be everyday ambassadors for the University, and ensure the highest levels of ethical conduct
- (V) Maintain an open and transparent relationship with key stakeholders



3. Compliance

Overall Risk Appetite: LOW

Definition

Compliance Risk refers to events or circumstances that could potentially compromise compliance with law, regulation, or other legal requirement.

Overview

TDA recognises the obligations placed on it as the steward of donations made by alumni and supporters and as such is committed to maintaining the highest standards of integrity, compliance, and ethics. TDA has very LOW appetite for any breaches in statute, regulation, or professional standards, and a ZERO tolerance for any planned breach or the failure to mitigate against the risk of a breach. We are committed to maintaining a strong control system. that promotes and monitors compliance with legal requirements.

The key areas of compliance for the TDA include but are not limited to.

- (i) Data protection
- (ii) Tax laws
- (iii) Charities Governance Code and Charities legislation
- (iv) Ethical Standards

WE WILL,

- (i) deploy training, guidance, and control systems to foster compliance with legal requirements
- (ii) mitigate any weaknesses in processes, procedures, or gaps in staff knowledge that could result in compliance risk to TDA, or otherwise compromise our adherence to the laws and regulations
- (iii) monitor changes to applicable legal requirements and communicate modifications throughout the organisation
- (iv) consult with legal and other advisors as appropriate to evaluate, quantify, and mitigate compliance risks
- (v) take consistent legal positions that are supported by the law, represent the best interests of the TDA and the University

4. Financial Risk

Overall Risk Appetite: Low

Definition

Financial risk is the risk of a financial loss to the organisation or a risk that will impact upon the long-term sustainability of TDA. Financial risk includes the risk of fraud, waste, loss, or the unauthorized use of TDA funds, property, or other assets. It also refers to conflicts of interest that could adversely affect the accountability of TDA in the proper disbursement of its funding.



Overview

TDA aims to maintain its long-term financial sustainability and will secure the basis for its future development.

While TDA is willing to invest in new and innovative strategies to further its strategic objectives and will set ambitious targets in its strategic plan, it is committed to manage its financial risk by not breaching any financial requirements or budgetary constraints.

TDA has a **ZERO-tolerance** approach to towards fraud and corruption and has implemented a fraud policy which will robustly deal with any incidence of suspected fraud

TDA will conform to the highest standards of honesty, transparency, and accountability in the way it conducts in business. TDA therefore has a **LOW-risk appetite** in this area

WE WILL:

- (i) Identify and promptly investigate any possibility of fraudulent or related dishonest activities against TDA and, when appropriate, pursue all legal remedies available under the law
- (ii) Continually maintain, assess, and update our systems of audit, risk-assessment, and internal controls
- (iii) Hold our staff to the highest possible ethical standards, and expect them to protect the interests of our donors and the University
- (iv) Take a **ZERO-tolerance** approach towards fraud, corruption, or violation of law

5. People & Culture

Overall Risk Appetite: Low

Definition

People & Culture risk refers to events or circumstances that could potentially compromise the capacity, productivity, wellbeing, hiring, or retention of our employees. There is a risk of skill gaps, excessive staff turnover as well as non-compliance with or the inconsistent application of systems, procedure, and risk mitigation measures.

Overview

TDA aims to value, support, develop and utilise the full potential of our staff to make it a stimulating and safe place to work. It places importance on a culture of equality and freedom, dignity and respect, collegiality, continuous performance reviews, the development of staff and the health and safety of staff. It has a low appetite for any deviation from its standards in these areas. Our success in achieving our mission directly depends on the knowledge, skills, abilities, dedication, and robustness of our workforce. We recognise that our staff is our most important asset for managing risk – through designing and implementing control systems, making risk informed decisions, coping with pressure, and skilfully solving problems.

WE WILL:

- (i) Mitigate stress and resilience issues that affect TDA staff by providing an Employee Assistance Programme and other services



- (ii) Implement agile, transparent processes to attract and onboard staff
- (iii) Empower managers with the skills and support they need to manage staff effectively
- (iv) Uphold a transparent equitable performance management system that promotes excellence
- (v) Provide high quality training and mentoring to build capacity and support rising leaders and invest in dedicated employee development plans, supporting employees on their career journeys.

6. Operations

Overall Risk Appetite: Low

Definition

Operational risk is the risk of unwanted events within TDA arising due to inadequate or failed internal processes, people, and systems or from external sources.

Overview

Effective operational risk management programmes help reduce volatility and create organisation resilience. Major change activities are required periodically to develop TDA and to adapt to changes in the regulatory environment, in the nature and conduct of TDA's activities and the socio-economic environment. While TDA has a **MODERATE risk appetite** to take risks in order to adapt to such changes we expect such changes to be managed in accordance with best practices in project and change management. Overall, we therefore have a **LOW-Risk Appetite** in the area of Operations.

WE WILL:

- (i) Have an appropriate internal control environment in place and ensure that staff have appropriate awareness of and training in all processes and risk mitigations
- (ii) Incorporate findings and observations from all internal and statutory audits
- (iii) Maintain a risk register and associated action and mitigation plan which is periodically reviewed and challenge by management and Board
- (iv) Ensure there is rigorous oversight of all activities and ensure we always operate in accordance with applicable laws and regulations
- (v) Have in place the internal control environment and systems to ensure the safeguarding of donor funds while they are in our possession
- (vi) Transfer philanthropic gifts in full to the University and put in place processes to ensure that the wishes of the donor, with regard to the purpose to which the funds are put, are fully respected

7. Information Technology Risk

Overall Risk Appetite: LOW

Definition

IT and cybersecurity are the risk of an event or events occurring which result in TDA's information being lost, stolen, copied, or otherwise compromised (a "breach") with adverse legal, regulatory, financial, reputational and / or other consequences for the organisation.

Overview

TDA promotes a culture of diligence and high ethical standards with regards to the collection, storage, and processing of our alumni's personal information. Safeguarding our alumni data is critical to delivering our strategic objectives while also being one of our most significant risk management challenges. We aim for a high level of safety through education, training, and the open sharing of skills, experiences, and information. We encourage a culture of risk awareness and the constructive challenging of decisions and follow sound data protection principles. We comply with internal and University policies, regulations, and procedures, and respect their spirit. All individuals, including our partners and suppliers, are expected to contribute to and promote this culture of safety and awareness. We therefore have a **very LOW-risk tolerance** in the area of data and cybersecurity. TDA recognises the benefit which accrues from the investment in new IT systems and processes which allow for more impactful modes of communications and greater interaction with Alumni as well as streamlining internal business process and accordingly has a **LOW-Risk Appetite** in this area.

Risk Appetite by Sub-Domain

Sub-Domain	Risk Appetite	Notes
Data Protection	Zero	No tolerance for breaches due to internal control failures, poor security hygiene, or non-compliance with IT policies, GDPR or other relevant data protection laws
System Vulnerabilities (e.g. unpatched software, end of life systems)	Zero	For end-of-life systems the risk is only accepted if transition plans are in place and actively managed and business continuity is assured. No tolerance for unpatched software
Staff training (user behaviour and awareness)	Zero	IT Security and data protection training provided both internally and by IT Services are mandatory for all staff
External Threats (e.g. Phishing, malware, DDos etc)	Very-low	While not all external threats can be prevented the University and TDA will invest in layered defences, detection and response capabilities



Unplanned IT outages	Very-Low	High resilience is essential for all priority activities and services. TDA maintains a comprehensive Business Continuity Strategy and Disaster Recovery Framework, which includes mandatory regular testing to ensure that up-to-date recovery plans are in place for all systems, including those managed by third-party suppliers
IT Security policies, governance & compliance	Zero	All systems, users and third parties are required to comply with relevant legal & regulatory requirements as well as University and TDA IT policies
Third party suppliers	Low to Zero	All suppliers will meet strict due diligence, contract and compliance standards. TDA data must be protected and retrievable to the standards as are applied internally
Innovation & Digital Transformation	Low	TDA is open to exploring innovative technologies, such as cloud-based platforms, CRM systems, and data analytics tools, if the risks are clearly understood, mitigated, and aligned with our ethical values and operational capacity

WE WILL

- (i) Proactively manage cybersecurity risks by continuously identifying and mitigating malware and other intrusion events such as phishing attacks
- (ii) Incorporate findings and observations from cybersecurity audits and penetration testing
- (iii) Ensure staff are aware of the risk and always operate in line with IT Security policies
- (iv) Ensure a programme of compliance verification is in place for all third party suppliers
- (v) Implement and routinely test an IT data recovery and business continuity plan
- (vi) Seek to invest in new IT systems and processes to drive efficiencies across the organisation as well as supporting the fundraising and alumni relations functions

8. Environment, Social and Governance

Overall Risk Appetite: Low

Definition

An environmental, social or governance event or condition is one that, if occurs, could cause an actual or potential material negative impact on TDA's reputation or long-term financial viability arising from an adverse sustainability impact.



- *Environment:* Climate change; sustainable use and protection of water and marine resources, transition to a circular economy, waste prevention and recycling, pollution prevention control and protection of healthy ecosystems.
- *Social:* Equality, social cohesion, social integration, and labour relations: and
- *Governance:* Sound management structures, employee relations, remuneration of relevant staff and tax compliance.

Overview

As the philanthropic arm of Trinity College Dublin, it is important that TDA takes responsibility for delivering positive outcomes for the environment and society. We recognise that there is a key benefit of recognising ESG-related factors in organisational management including enhancing our engagement with alumni and supporters as well as attracting the best talent to our staff.

WE WILL:

- (i) At all times comply with and promote the core mission and values as set out in the current University's Strategic Plan)
- (ii) support and promote the current Trinity Sustainability Strategy and accompanying Action Plan in TDA operations
- (iii) Proactively work with the College in its mission to reduce its carbon footprint by developing our own sustainability policy and ensuring that sustainability is included within the criteria for all TDA run procurement tenders
- (iv) Support the College in its mission to contribute more widely in this area by actively fundraising for projects which have ESG focus
- (v) comply with the University's Ethics Policy and Gift Acceptance Policy with respect to the engagement with and acceptance of gifts from donors
- (vi) maintaining compliance with the Charities Regulator's Governance Code
- (vii) embracing equality, inclusion and diversity amongst our staff and volunteers and through our recruitment processes



POLICY VERSION HISTORY

Version	Date	Brief Summary of Change	Owner's Name
V1.0	23/10/2019	Initial Document approved by trustees	David O'Shea
V1.1	05/11/2020	Reviewed and approved by trustees	David O' Shea
V1.2	09/05/2022	Reviewed and approved by trustees	David O' Shea
V1.3	30/05/25	Reviewed and approved by Trustees	David O'Shea

CONSULTATION PROCESS DETAILS

REVIEW AND CONSULTATION PROCESS	<p>The policy owner will implement a two-tier review process which involves both an annual scan of the policy and supporting processes to ensure alignment with relevant University policies and any legal updates; and a deep dive review of the policy and supporting processes every three years to ensure alignment, relevance, and implementation measures are in place.</p> <p>Reviews to be approved by TDA Director of Operations.</p>
ASSOCIATED DOCUMENTATION	<p>Legal Framework: Charities Act 2009, Charities Governance Code</p> <p>Trinity Policies: University Risk Management Policy May 2022 https://www.tcd.ie/about/policies/assets/pdf/Risk-Management-Policy-May2022.pdf</p>

RESPONSIBILITIES & DISTRIBUTION

IMPLEMENTATION & TRAINING:	<p>Implementation: Initial training and Statement issued to all new staff at induction; Annual all staff training; OMT review bi-annually prior to review of Risk Register</p> <p>Training: Director of Operations</p>
DISTRIBUTION METHODS:	<ul style="list-style-type: none">• Soft Copy distributed to all staff on induction.• Available on Staff Bamboo HR system.
FOR FURTHER INFORMATION ON THIS POLICY	<p>Name: David O' Shea E-mail: OSHEADA@tcd.ie</p>