



**Royal Berkshire**  
NHS Foundation Trust

# Council of Governors - 27 May 2026

MEETING

27 May 2026 17:00 BST

PUBLISHED

27 May 2026

# Agenda

Location	Date	Time		
Video Conference Call	27 May 2026	17:00 BST		
Item	Owner	Time	Page	
1 Apologies for Absence and Declarations of Interest (Verbal)	Oke Eleazu		-	
<b>Holding the Board to Account</b>			-	
2 Chief Executive Update (Presentation)	James Blythe	17:00	-	
3 Digital Strategy (Presentation)	Dom Hardy	17:30	-	
4 Questions from the Public (Verbal)			-	
5 Minutes for Approval: 25 February 2025 & Matters Arising Schedule	Caroline Lynch	17:50	3	
<b>Items of Council Business</b>			-	
6 Governors Assurance Committee Minutes: 29 April 2026	Tom Duncan	17:55	8	
7 Governors Nominations & Remuneration Committee Terms of Reference	Caroline Lynch	18:00	12	
8 Changes to the Council Membership (Verbal)	Caroline Lynch	18:05	-	
<b>Representing the Views of Members and the General Public</b>			-	
9 Governor Question Log (To Note)	Caroline Lynch		15	
10 Questions from the Public (Verbal)	Oke Eleazu	18:10	-	
11 Reflections of the Meeting:	Joshua Wilson	18:15	-	
11.1 What did we feel/think during discussions?			-	
11.2 What improvement/s do we need to make to be more effective?			-	
12 Date of Next Meeting: Wednesday 23 September 2026 at 17.00	Oke Eleazu		-	

## Council of Governors

Wednesday 25 February 2026

17.00 – 18.30

Seminar Room, Trust Education Centre

### Present

Mr. Oke Eleazu	(Chair of the Trust) (Chair)
Mr. Martyn Cooper	(Public Governors, West Berkshire & Borders)
Dr. Tom Duncan	(Staff Governor, Medical/Dental)
Mrs. Alice Gostomski	(Public Governor, West Berkshire & Borders)
Mr. Richard Havelock	(Volunteer Governor)
Ms. Sunila Lobo	(Public Governor, Reading)
Ms. Maria Norville	(Public Governor, Wokingham)
Mr. Tony Page	(Public Governor, Reading)
Mr. Andrew Peters	(Public Governor, East Berkshire & Borders)
Mrs. Clare Stafford	(Public Governor, West Berkshire & Borders)
Cllr. David Stevens	(Partner Governor, Reading Borough Council)

### In attendance

Dr. Minoo Irani	(Non-Executive Director)
Mr. Umesh Jetha	(Non-Executive Director)
Mrs. Caroline Lynch	(Trust Secretary)
Mrs. Helen Mackenzie	(Non-Executive Director)
Mrs. Catherine McLaughlin	(Non-Executive Director)
Mr. Steve McManus	(Chief Executive) (up to minute 05/26)
Mr Andrew Statham	(Chief Strategy Officer)
Ms. Helen Troalen	(interim Chief Finance Officer)
Mrs. Tara Whittington	(Head of Corporate Governance)

### Apologies

Mr. Jonathan Barker	(Public Governor, Reading)
Mr. Darren Browne	(Partner Governor, Autism Berkshire)
Ms. Jessica Grierson	(Staff Governor, Admin/Management)
Mr. Yaman Islam	(Public Governor, East Berkshire & Borders)
Dr. Paul Jenkins	(Partner Governor, University of Reading)
Mr. Clive Jones	(Public Governor, Wokingham)
Mr. Benedict Krauze	(Public Governor, Wokingham)
Mr. Adrian Mather	(Partner Governor, Wokingham Borough Council)
Mr. William Murdoch	(Public Governor, Southern Oxfordshire)
Ms. Joycee Rebelo	(Public Governor, Reading)
Mr. Madan Uprety	(Staff Governor, Health Care Assistant/Ancillary)
Mr. Terri Walsh	(Public Governor, Wokingham)
Mr. Paul Williams	(Public Governor, Reading)

There were no members of the public present.

### 03/26 Declarations of Interest

There were no declarations of interest.

**04/26 Chief Executive Update**

The Chief Executive advised that the Trust had received an enforcement notice under the Building Safety Act 2022 requiring both immediate and longer-term remedial action in the Maternity building. The Trust was working in conjunction with the Royal Berkshire Fire and Rescue Service (RBF&RS). Flooring within the Maternity Block had been assessed as being effective in limiting vertical fire spread. However, the removal of asbestos over a number of years had compromised a fire compartmentalisation. In addition, a further enforcement notice had been issued by RBF&RS that would require remedial works to restore effective compartmentalisation throughout the affected areas.

The Chief Executive reported that staff were fully aware of local evacuation procedures although further work would be undertaken to strengthen a full evacuation process. The top two floors of the building were currently accommodated by patient groups that would require longer-term relocation to support effective evacuation arrangements. Therefore, with these measures in place, the Maternity building remained safe and fit for purpose.

The Chief Executive highlighted the positive 2025 Staff Survey results. The Trust had achieved its highest response rate to date at 62%, exceeding the national average of 40–50%. The Council discussed the positive results and suggested that the Trust would consider ways to engage those staff that had not responded. The Chief Executive advised that once the embargo on staff survey results had been removed, the Trust would be able to compare its performance with other NHS trusts. The full staff survey results would be submitted to the public Board in March 2026.

The Chief Executive reported that, following Board approval, the Trust had submitted a final Operational plan to NHS England (NHSE) in February 2026. This included the intention to improve its financial position by circa £10m a year over the next few years. In response to a query, the Chief Executive confirmed that the Trust was not in a position to apply for Advanced Foundation Trust (AFT) status although it was providing support to Berkshire Healthcare Foundation Trust (BHFT) in their application.

The Chief Executive highlighted the success of the Trust's 'Improving Together' programme. This had then led to the development of the 'Live Laboratory' initiative that was designed to share learning on quality and improvement with other NHS trusts.

The Chief Executive advised that the Trust was formalising an international collaboration with Amphia Hospital in the Netherlands. Both organisations had undertaken reciprocal visits, and one area of particular interest for the Trust was the 'Amphia at Home' programme. The learning from this would be pertinent for the Trust's 'RBFT at Home' strategic programme.

The Chief Executive provided an update on the 'Recognition of Excellence Scheme' and reported that the Trust now had 10 'university departments of', five of which included jointly appointed professorial posts.

The Chief Executive provided an update on the Trust's financial position confirming that the Trust remained on plan at Month 10. The Trust also continued to be rated within the top 10 acute trusts in the NHS Oversight Framework league table.

The Lead Governor, on behalf of the Council, thanked the Chief Executive for his service to the Trust.

**05/26 Questions from the Public**

There were no members of the public present.

**06/26 Minutes for Approval: 26 November 2025 and Matters Arising Schedule**

The minutes of the meeting held on 26 November 2025 were agreed as a correct record and signed by the Chair.

The matters arising schedule was noted. All actions had been completed or were on the agenda.

**07/26 Draft Governors Assurance Committee: 28 January 2026**

The Council received the draft minutes of the meeting held on 28 January 2026.

**08/26 Draft Membership Committee Minutes: 10 February 2026**

The Council received the minutes of the meeting held on 10 February 2026. The Chair of Committee highlighted feedback from the meeting included the need for Governors to demonstrate respectful behaviour. The Chair of the Trust reminded all Governors to carefully consider their tone of voice and choice of words when they spoke in meetings.

**09/26 Changes to the Council Membership**

The Trust Secretary advised that, changes to the Council membership since the last meeting included Miranda Walcott, Partner Governor, Integrated Care Board (ICB) had resigned from her role in February 2026. The ICB had been approached to confirm the name of a replacement Partner Governor.

**10/26 Board Feedback: Governors Attending Board Committees**

The Chair of the Trust provided an overview of the feedback from the Board following the request from Governor to attend Board committees.

The Board had considered the following: A 'should do' action from the last formal Care Quality Commission (CQC) inspection was for the Chair and Trust Secretary to provide further training to Governors to clarify their role as Governors, at the time, had raised their request to attend Board Committees in a Focus Group.

NHS Providers had also issued guidance on the topic and did not encourage or promote Governor attendance at Board committees as routine practice, they should not play an operational role and there was a need to maintain clear governance boundaries. In addition, committees were advisory to the Board, and their work was not part of the Governors' statutory role. Also, the primary assurance route for Governors should be via the Non-Executive Directors for Board performance.

The Chair of the Trust also advised that the Board considered that the introduction of the Chair Assurance reports would provide Governors with further insight on key items discussed at Board committees to support them in the role on seeking assurance from Non-Executive Directors. The Chair Assurance reports would be included in Governor Assurance Committee agendas going forward. **Action: C Lynch**

The Council noted that the Board had suggested that Governor membership of the Charity Committee should be rotated on an annual basis to enable more Governors to attend this Board committee. The Trust Secretary would implement this rotation. **Action: C Lynch**

The Chair of the Trust advised that the Chief Nursing Officer had offered two places for Governors to attend the new 'Experience First' Committee. These places would also be rotated

on an annual basis. The Trust Secretary would seek expressions of interest from Governors to join this Committee. **Action: C Lynch**

#### **11/26 Governor Question Log**

The Trust Secretary introduced the Question Log and advised that a response to the additional questions in relation to slip hazards in the staff car park, had now been provided to the Governor concerned.

In response to a governor question regarding the extended availability of the Trust buggy for patients, the Trust Secretary reported that the Associate Chief Nurse had advised that the Trust would extend volunteer shifts by 30 minutes from 27 April 2026 for a trial period.

#### **12/26 Questions from the Public**

There were no members of the public present.

#### **13/26 Reflections of the Meeting**

Paul Williams led a discussion.

#### **14/26 Date of Next Meeting**

It was agreed that the next meeting would take place on Wednesday 27 May 2026 at 17.00.

**SIGNED:**

**DATE:**

## Agenda Item 5

Date	Minute Ref	Subject	Matter Arising	Owner	Update
25 February 2026	10/26	Board Feedback: Governors Attending Board Committees	The Chair Assurance reports would be included in Governor Assurance Committee (GAC) agendas going forward.	C Lynch	Completed. These now form part of the routine GAC agenda.
25 February 2026	10/26	Board Feedback: Governors Attending Board Committees	The Council noted that the Board had suggested that Governor membership of the Charity Committee should be rotated on an annual basis to enable more Governors to attend this Board committee. The Trust Secretary would implement this rotation.	C Lynch	Completed. One new governor representative will join the Committee from August 2026 onwards and a further Governor is required for the November 2026 meeting.
25 February 2026	10/26	Board Feedback: Governors Attending Board Committees	The Chair of the Trust advised that the Chief Nursing Officer had offered two places for Governors to attend the new 'Experience First' Committee. These places would also be rotated on an annual basis. The Trust Secretary would seek expressions of interest from Governors to join this Committee.	C Lynch	Three expressions of interest were received and the relevant Governors have been asked to confirm who will take up the two places.

## Governors Assurance Committee

Wednesday 29 April 2026

17.00 – 19.00

Video Conference Call

### Present

Dr. Tom Duncan	(Staff Governor, Medical/Dental) (Chair)
Mr. Jonathan Barker	(Public Governor, Reading)
Mr. Richard Havelock	(Volunteer Governor)
Dr. Sunila Lobo	(Public Governor, Reading), (Lead Governor)
Ms. Sarah Lupai	(Staff Governor, Nursing/Midwifery)
Mr. Tony Page	(Public Governor, Reading)
Cllr. David Stevens	(Partner Governor, Reading Borough Council)
Mr. Paul Williams	(Public Governor, Reading)
Rev. Joshua Wilson	(Staff Governor, Allied Health Professionals/Scientific)

### In attendance

Mr. Oke Eleazu	(Chair of the Trust)
Dr. Minoo Irani	(Non-Executive Director)
Mr. Umesh Jetha	(Non-Executive Director)
Mrs. Caroline Lynch	(Trust Secretary)
Mrs. Helen Mackenzie	(Non-Executive Director)
Ms. Catherine McLaughlin	(Non-Executive Director)
Mr. Mike O'Donovan	(Non-Executive Director)
Mrs. Tara Whittington	(Head of Corporate Governance)

### Apologies

Mrs. Alice Gostomski	(Public Governor, West Berkshire & Borders)
Mr. Benedict Krauze	(Public Governor, Wokingham)
Dr. Paul Jenkins	(Partner Governor, University of Reading)

### 08/26 Declaration of Interests

There were no declarations of interest.

### 09/26 Minutes for Approval: 28 January 2026 and Matters Arising Schedule

The minutes of the meeting held 28 January 2026 were approved as a correct record and would be signed by the Chair.

All matters had been completed or included as items on the agenda.

In response to a query raised regarding the Land Search the Trust Secretary advised that an update was submitted to private Board in April 2026.

### 10/26 Member Issues and Feedback

In response to a query regarding the Chair briefings to Governors, the Chair of the Trust confirmed these would resume on a weekly basis.

**Action: C Lynch**

## 11/26 Board Committee Key Issues

The Committee considered that the Chair Assurance reports provided a helpful summary of key issues discussed at Board Committees.

### Charity Committee

The Chair of the Charity Committee provided an overview of key issues discussed at the recent meeting. Following a workshop held at the end of March 2026, the Charity Director would be developing a report for the Board in May 2026 to consider a proposal to change the scope of the Charity over the next three years. Following this, an update could be provided at the next meeting.

**Action: C McLaughlin**

In response to a query, the Chair of the Charity Committee advised that the top three priorities of the Charity were to clarify its purpose, expand its reach and identify the correct skillset with the current team in addition to consideration of corporate partnerships.

### People Committee

The Committee received an update on key issues discussed at the recent meeting. The Committee had discussed concerns over the increased exception reporting by Resident Doctors whilst acknowledging that a key reason could be the ability for confidential reporting. The Committee had also noted that there was due to be an internal audit review undertaken in general surgery during 2026/27.

In response to a query regarding the Staff Survey, the Committee noted that the Chief People Officer was undertaking a detailed analysis of results by speciality as well as considering reasons to increase the survey response rate.

In response to a query regarding the Trust's need to reduce Whole Time Equivalent (WTEs) and whether assurance could be provided that the Trust was safely staffed, the Trust Secretary confirmed that a bi-annual process on Safer Staffing was undertaken by the Chief Nursing Officer.

### Finance & Investment Committee

The Chair of the Finance and Investment Committee provided an overview of issues discussed at the last three meetings including the delivery of the Trust's planned year-end deficit as well as the need to identify further recurrent savings for 2026/27 as there had been a number of non-recruitment savings during 2025/26. As a result of the Trust meeting its planned deficit position for 2025/26, the Trust would receive £3m of Deficit Support Funding (DSF).

The Chair of the Finance and Investment Committee highlighted that the Board had agreed the use of £3.5m of Public Dividend Capital (PDC) in order for the Emergency Department expansion project to continue. This was due to a delay in funding being received from NHS England (NHSE). However, since that date, the Trust had now received the funding from NHSE.

The Trust was currently in Tier 3 in the National Oversight Framework (NOF). This was due to its deficit position. Any provider with a deficit position was automatically placed in Tier 3 regardless of its other areas of good performance.

In response to a query regarding the overspend on high cost drugs, the Chair of the Quality Committee advised that work was ongoing by the Chief Finance Officer to review this.

### Quality Committee

The Chair of the Quality Committee reported that the Committee had discussed the increase in both the number and complexity of complaints received by the Trust. The response rate was below the target of 25 days. The Chief Nursing Officer had commissioned a detailed review and the Committee had received this report at its February 2026 meeting. Actions from the review were in progress.

The Committee noted that the Trust had breached its target in 2025/26 for C.Diff. and the Quality Committee had received assurance on the actions being taken.

The Chair of the Quality Committee highlighted that a query had been raised in relation to Mixed Sex Accommodation (MSA). The Trust had breached its target with a significant increase of over 600 cases in January 2026. The Chair of the Quality Committee advised that these breaches often occurred in times of significant operational pressure and this was also discussed with patients.

The Chair of the Quality Committee advised that the Committee had received a detailed review of the Patient Safety Incident Response Framework (PSIRF) and the Committee had received assurance that the reporting levels were returning to the previous levels.

The Chair of the Quality Committee advised the Trust's teams had managed the Winter Plan well.

In response to a query raised, the Chair of the Quality Committee advised that there had been eight sexual abuse cases at the Trust in the last two years and summarised the safeguarding procedures in place. Disclosure & Barring Service (DBS) checks were carried out for all staff ahead of employment, and clear procedures were followed when an issue was raised. This could be supervision of an employee and an investigation. In some cases, where relevant, the police and social services would be informed and in the event of an employee being found guilty of an offence they would be dismissed.

### Audit & Risk Committee

The Committee noted that the Audit and Risk Committee had received the internal audit review on the Board Assurance Framework. This had been rated as 'significant assurance with minor improvements opportunities'.

The internal audit on the PSIRF had been rated as 'partial assurance with improvements required'.

The Audit & Risk Committee had also received good assurance of processes in place for Freedom to Speak Up (FTSU).

The Committee noted that there had been a period in Quarter 3 2025/26 with a low level of fraud referrals although this had been similar for other trusts. Assurance had been provided that counter fraud processes were managed well in the Trust.

## **12/26 Reflections of the Meeting**

Catherine McLaughlin led a discussion.

## **13/26 Date of Next Meeting**

It was agreed that the next meeting would be held on Wednesday 24 June 2026 at 17.00

**SIGNED:**

**DATE:**

DRAFT

## **Council Nominations and Remuneration Committee**

### **Terms of Reference**

#### **Role of the Committee**

The Committee will oversee the development, implementation and review of the policy for the composition of Non-Executive Directors and the policy for the composition of Governors.

The Committee will make recommendations to the Council on the appointment of Non-Executive Directors

The Committee will recommend to the Council of Governors the terms and conditions, including remuneration and allowances, of Non-Executive Directors.

The Committee will oversee the appraisal process for the Chair of the Trust and Non-Executive Directors.

Review protocols for the approval of Chief Executive, appraisal of the Chair of the Trust and Non-Executive Directors and appointment of Non-Executive Directors.

#### **Composition**

The Committee will be chaired by the Lead Governor.

The Committee will comprise any Governor wishing to serve.

In discharging its remuneration duties, the Chief Executive of the Trust will be entitled to attend meetings, unless the Committee decides otherwise, and the Committee will be required to take account of the Chief Executive's views.

The Chief People Officer and the Trust Secretary will be in attendance to advise the Committee as appropriate.

The Committee will also be expected to seek the advice of external advisors when appropriate, as defined in the Constitution, when determining the remuneration policy for Non-Executive Directors.

Members and advisers will be required to make known any knowledge of candidates being considered for appointment.

#### **Quorum**

The quorum will be five members, three of whom must be public Governors.

#### **Remuneration Duties**

The Committee will make recommendations to the Council of Governors on the following

1. To develop, seeking the advice and recommendations of the Chief Executive, mechanisms to ensure that the Committee and the Council in general is informed of the up to date position on Non-Executive Director remuneration in the public and private sectors, in particular the practice in Foundation Trusts
2. To recommend an overall remuneration and terms of service policy for the Non-Executive Directors, taking into account the advice of the Chairman (other than in respect of their own remuneration), Chief Executive and external advisors to the Committee.
3. To recommend levels and terms of service for individual Non-Executive Directors, taking into account the overall policy established by the Trust

### **Nomination Duties**

1. To establish and keep under annual review a policy for the composition of Non-Executive Directors, which takes account of the strategic needs of the Trust and the balance of the Board, and the membership strategy
2. To consider, and reflect in its deliberations, advice and recommendations from the Board on the skills and experience required in any Non-Executive Director appointment
3. To identify, taking account of the skill needs and balance of the Board, appropriate candidates for appointment as Non-Executive Directors. In doing so, the Committee will seek the advice of the Chair of the Trust (or the Deputy Chair in the case of appointing the Chair of the Trust, unless the Deputy is seeking appointment as Chair of the Trust) and the Board throughout the process
4. To establish and keep under annual review a policy for the composition of the Council of Governors, which takes account of the membership strategy
5. To oversee the process for the appraisal of the Chair of the Trust and Non-Executive Directors as set out in the protocol agreed between the Board of Directors and Council of Governors
6. To keep under review the protocol for the appraisal of the Chair of the Trust and Non-executive Directors.
7. Act on behalf of the Council in the arrangements agreed with the Board for the appointment of a Chief Executive.
8. Keep under review the protocol for the appointment of a Chief Executive.

### **Process**

In making recommendations for the appointment of Non-Executive Directors, the following process, prescribed by the Constitution, must be followed

- The Council of Governors will maintain a policy for the composition of the Non-executive Directors which takes account of the membership strategy, and which they shall review from time to time and not less than every three years

- The Chair of the Trust (or in the case of the appointment of the Chair of the Trust, the Deputy Chair), or Vice Chair of the Council of Governors, two Governors and the Chief Executive will work with an independent advisor to identify the skills and experience required for Non-Executive Directors
- Appropriate candidates will be identified by the Governor Nominations & Remuneration Committee which will include the Chair of the Trust (or Deputy Chair (unless they are standing for appointment, in which case another Non-Executive Director, when a Chair is being appointed) and at least one elected Governor and one appointed Governor. The Nominations & Remuneration Committee will take account of the policy maintained by the Council of Governors and the skills and the experience required. The Chief Executive will be entitled to attend meetings of the Nominations & Remuneration Committee unless the Committee decides otherwise and the Committee shall take into account the Chief Executive's views

### **Review**

The Committee will review these terms of reference annually, making recommendations to the Council of Governors as appropriate.

Approved by the Committee:

Approved by the Council:

<b>Title:</b>	<b>Governor Question Log</b>
<b>Agenda item no:</b>	9
<b>Meeting:</b>	Council of Governors
<b>Date:</b>	27 May 2026
<b>Presented by:</b>	Caroline Lynch, Trust Secretary
<b>Prepared by:</b>	Tara Whittington, Head of Corporate Governance

<b>Purpose of the Report</b>	To provide the Council of Governors with an overview of the Governor Question Log since the last meeting.
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<b>Report History</b>	None
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<b>What action is required?</b>	
Assurance	
Information	The Council of Governors is asked to note the report.
Discussion/input	
Decision/approval	

## 1 Background

- 1.1 The Governor Question Log was created in 2016 in order to record issues and the Trust's progress in dealing with them. It was not intended to be used as a general purpose question log.

## 2 Scope of the Governor Question Log

The Question Log is designed to capture two broad kinds of issues:

- Strategic Issues – fundamental policy questions or critical challenges affecting the organisation, strategy, goals, resources, stakeholders, structure, processes, management, governance or service mix.
- Other significant outstanding problems or questions, where it is important to have a plan of action to identify responsibility for resolution and to track progress.

## 3 Process of the Governor Question Log

- 3.1 As agreed by the Council of Governors in 2016 Governor questions should be directed to the Trust Secretary. Questions would then be logged on the form and a response provided within 30 working days where possible.
- 3.2 The log would be submitted as a standing item to each Council meeting and made available to Governors via the Trust website and Workvivo.

## 4 Changes since the last meeting

- 4.1 All questions submitted to the Trust Secretary since the last meeting are included in appendix 1.

## 5 Attachments

Appendix 1 – Governor Question Log



				<p>28/01/26.</p> <p>Following the update, the team will continue to prepare all areas the afternoon before. However, if the trigger point is forecast for 04:00, the team will now attend the site again at approximately 05:00 to check all areas, completed again before the main hospital ingress and egress period between 07:00 and 09:00</p>
213	9 January 2026	Darren Browne	<p>From April 2026, HMRC will apply strengthened “joint and several liability” rules for employment taxes. Where agency or umbrella arrangements are found to be non-compliant, HMRC may recover unpaid PAYE and National Insurance from any party in the supply chain, including the NHS Trust as end-hirer. Importantly, worker tax indemnities used by some agencies do not protect the Trust from HMRC action. Given the Trust’s reliance (although reducing) on temporary and agency staff, this presents a material governance, financial and reputational risk if not properly thought through.</p> <p>My submission asks to consider whether the Trust should:</p> <ul style="list-style-type: none"> <li>• Use agencies that only operate through umbrella payroll companies holding FCSA accreditation, and</li> <li>• Consider requiring that each agency worker timesheet and corresponding payment is independently audited through a product such as SafeRec, which provides real-time, auditable assurance that PAYE and NICs have been correctly applied.</li> </ul>	<p>The Trust recognises the importance of the forthcoming HMRC changes and the need to maintain appropriate oversight of employment tax compliance across its labour supply chain. The Trust’s policy is to source temporary and agency staffing exclusively through nationally approved NHS procurement frameworks. Agencies appointed through these frameworks are subject to due diligence, including assessment of their understanding of, and compliance with, relevant tax and employment legislation, and are required to provide appropriate contractual assurances.</p> <p>In relation to payment assurance, the Trust has established internal controls requiring verification and approval of shifts worked prior to payment being processed. These controls are designed to ensure that payments align with authorised work undertaken.</p> <p>The Trust continues to review its arrangements in response to regulatory developments; however, at this time we do not consider that the introduction of an additional external audit layer for agency worker timesheets and payments is necessary. The position will remain under review as further guidance becomes available.</p>

			These measures would give the Trust independent, defensible oversight of payroll compliance across its labour supply chain ahead of the April 2026 commencement date.	
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