Executive Pay Policy

Version	1.2
Approving Body	Trust Board
Date ratified	24 September 2026
Date issued	01 October 2026
Review date	01 October 2027
Owner	Director of People and Culture
Applies to	CEO and All Trust Executives

Version	Date	Reason
1.0	11 December 2025	To establish a Trust wide policy
1.1	October 2026	2 appendices added, changes made to sections 2,3,4,6
1.2	November 2026	Updated appendix 1 with the salary scale changes based on STPCD for executive pay and non-stpcd executive pay, plus cost of living awards

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1. POLICY PURPOSE

This policy sets out the framework for making decisions on executive leaders' pay. It has been developed to comply with current legislation, the requirements of the School Teachers' Pay and Conditions Document (STPCD), the National Joint Council (NJC) for Local Government Services National Agreement on Pay and Conditions of Service ("Green Book") and in accordance with the seven Nolan Principles of public life. We will comply with the requirements of the Equality Act (2010) and are committed to ensuring that employees are not disadvantaged or discriminated against because of the protected characteristics of age, disability, gender, gender re-assignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief and sexual orientation when making any pay decisions within this policy.

As part of the application of this policy, the Trust will collect, process and store personal data in accordance with our data protection policy. We will comply with the requirements of Data Protection Legislation (being the UK General Data Protection Regulation and Data Protection Act 2018) and any implementing laws, regulations and secondary legislation, as amended or updated from time to time, and our data protection policy and privacy notice sets out how we will gather, process and hold personal data of individuals in relation to pay.

Confidentiality and Record Keeping

All parties must maintain confidentiality regarding pay decisions, with breaches subject to disciplinary and legal action. Comprehensive records of pay determinations and appeals are maintained securely in compliance with data protection laws.

Effectiveness of Policy Review

The Trust Board, supported by the Performance Management Committee, will monitor the outcomes and impact of this policy on an annual basis.

This policy has been implemented following formal consultation with recognised professional associations and trade unions.

2. PRINCIPLES OF EXECUTIVE PAY SETTING

Executive positions within the Trust's executive team (including the Chief Executive Officer and all operational/educational Trust Executives) are appointed on either STPCD or non-STPCD contracts of employment. Non-STPCD contracts' pay framework sits outside the scope of statutory school teacher frameworks and is governed exclusively by this policy.

Executive leaders' pay arrangements will be determined prior to advertisement and upon successful appointment and pay will be reviewed during the annual professional development review (PDR) appraisal process.

The Trust Board, supported by the Performance Management Committee (PMC), is responsible for the pay determinations of the CEO and Executive Leaders. Independent scrutiny and challenge by the Board's Performance Management Committee is expected to reach an agreed and documented recommendation to go to the full Trust Board, in line with the Scheme of Delegation (SoD), Academy Trust Handbook (ATH) and in accordance with Trust values, public sector values, and the seven principles of public life. The process includes justification and proportionality for the level of remuneration and benefits, which represent good value for money and are defensible relative to the public sector market.

Publication of Pay

In accordance with the requirements of the Academy Trust Handbook, the Trust annually publishes on its website the number of employees whose benefits exceeded £100,000, in £10,000 bandings, for the previous year ended 31 August. Benefits for this purpose include salary, employers' pension contributions, other taxable benefits and termination payments.

3. DETERMINING EXECUTIVE PAY

Recruiting Executive roles

The Trust Board will determine the pay range for an Executive vacancy prior to advertising it, considering the scope of role responsibilities and alignment with public sector norms, not commercial market rates. On appointment it will determine the starting salary within that range to be offered to the successful candidate.

Prior to advertising any newly created or significantly altered executive position, the job description and person specification will be peer sector benchmarked to similar sized Multi-Academy Trusts, ideally within a similar region, or as closely comparable to.

When setting pay and terms and conditions for the Executive team, the following multi-sourced approach of information will be taken into consideration and used for reference purposes:

- School Teachers Pay and Conditions (STPCD)
- Academy Trust Handbook (ATH)
- DfE "setting executive salaries" guidance
- Three-yearly independent external pay review for executive leaders
- The rate of increase alongside the median earnings of the trust's whole workforce
- Green Book and Burgundy Book
- Guidance and latest Executive leaders pay benchmarking from the Confederation of School Trusts (CST) for the South-West UK
- Peer Trusts latest pay benchmarking for the South-West UK
- Reference data on trust headteacher pay, to help understand the relative position of headteachers and other senior leaders in the trust.

Consideration is given to scope of role and responsibilities, individual performance, external pay benchmarking, market analysis and Trust performance (both educational and financial).

The Academy Trust Handbook requires senior employees to be exclusively on payroll (subject to PAYE). Executive employment arrangements will comply with HM Treasury guidance on tax and payroll obligations.

Financial Pay Parameters

To ensure public accountability and avoid arbitrary board discretion, the Trust establishes its executive pay ranges using a three-yearly independent external executive pay financial benchmarking, utilising a blended, multi-sector methodology combining mainstream education data, wider public sector/charity data, and direct peer-trust desktop reviews. See Appendix 1.

The latest external CEO benchmarking was conducted in March 2026.

The three-yearly independent pay benchmarking for the CEO role must establish a definitive 100% Market Midpoint (Compa-Ratio) with salary bands structured intentionally into defined competency zones (e.g., Developing, Fully Competent, Exceptional).

The Performance Management Committee (PMC) may recommend setting a role's specific starting salary or pay range above the baseline scale to account for trust growth, geographical challenges, or exceptional role complexity. However, under no circumstances shall the PMC recommend a pay range where the maximum boundary exceeds 25% above the median market rate established for an equivalent role in the Standard Trust Executive Scale.

Any proposal to breach this 25% limit requires the PMC to produce a comprehensive business case to explicitly justify why the standard scale is insufficient to attract or retain the candidate, detailed against the educational or financial challenges facing the Trust. The completed business case and independent evidence (if obtained) must be formally presented to, debated by, and ratified by a quorum vote of three of the Board of Trustees in line with the Trust's Scheme of Delegation (SoD).

Pay determination

The Trust Board, supported by the Performance Management Committee (PMC) is responsible for the pay determinations of the CEO and Executive Leaders. This includes approval for the application

of annual cost of living/pay awards and progression-related awards (see section on Pay Progression below), the review and determination of terms and conditions of employment, and the decision on eligibility to access to the Teachers' Pension Scheme. Pension, working hours, leave, notice periods, and other terms and conditions will be explicitly considered for executive roles.

The Performance Management Committee is to consider evidence-based information and sources in the justification and evidence pack provided to them:

- Appraisal / Professional Development Review (PDR)
- Appraisal / PDR reports confirming if objectives have been met, partially met,or not met
- Level of educational, geographical and financial challenge to the Trust (including any financial constraints / affordability)
- Level of predicted growth or contraction
- Independent external benchmarking data; pay advisory reports and evaluation
- Pay decisions should ensure that there are no biases pertaining to gender or other protected characteristics within the pay structure
- Role specific changes or factors and any relevant contractual changes
- Media/DfE and parental scrutiny

The Trust recognises its responsibilities under relevant legislation including the Equality Act 2010, the Employment Rights Act 1996, the National Minimum Wage Act 1998, the National Minimum Wage Regulations 1999, the Part-Time Workers (Prevention of Less Favourable Treatment) Regulations 2000, the Fixed-Term Employees (Prevention of Less Favourable Treatment) Regulations 2002 and ensures that all pay related decisions are taken equitably and fairly in compliance with statutory requirements.

Pay band ranges and associated provisions

Executive post holders under the STPCD must have completed a year of service since their last salary adjustment to be eligible for an increment in September on the basis of satisfactory objective achievements. Increment reviews occur annually in September and thereafter until the top of the executive pay band is reached.

The Trust establishes the pay ranges for the CEO and executive positions (see appendix 1), which is commissioned by the Performance Management Committee (PMC) in reference to an independent externalExecutive Pay benchmarking review every 3 years. The formal "Rationale & Evidence Pack" for any pay change will be permanently appended to the Trust Board minutes . This must be determined on appointment and will be revisited every third year thereafter.

The pay range of all executive leaders will be subject to review every 3years. Requests from individuals will not be accepted.

Benefits

Executive benefits will be the same benefits offered to all other Trust employees.

4. EXECUTIVE PAY PROGRESSION

There is no automatic entitlement to an annual increment based on time served or length of service. Progression through any executive pay band is strictly conditional upon evidence of successful completion and delivery of robust strategic objective achievements.

Executives receive annual increment review linked to their Professional Development Reviews (PDRs) and objectives set. The pay review will be completed latest by 31st December with increases backdated to the 1st September each year, with inflationary increases aligned to national pay awards and not exceeding the rate of other staff (in individual years and over the longer term).

Underachievement of robust strategic objectives may result in withholding annual progression. Accelerated progression is only possible upon recommendation by the PMC for approval by the Trust Board in line with the Trust's Scheme of Delegation (SoD).

1. Executive positions reporting to the CEO will have their objectives evaluated and appraised by the CEO. Pay increment progression is to be determined under the remit of the PMC to make a recommendation in a 'justification pack' to the full board for approval based on satisfactory objective achievements.

2. Executive pay, including CEO pay progression, will be considered by the PMC comprising the Chair of Trustees and two trustees who will meet annually and half yearly with the CEO, and who will seek advice from other trustees as appropriate. The two other trustees shall normally be the Chair of the Performance and Standards Committee (PSC) and the Chair of the Resources Committee, or at the discretion of the Chair of Trustees, other Trustees with relevant skills & experience.

   The annual objectives of the CEO will reflect Trust objectives for the year, and will be agreed by the Chair of Trustees as line manager. The Performance Management Committee only holds delegated powers to review and recommend. No executive pay increase or initial salary package can be finalised without a formal vote and minuted sign-off by the Trust Board in line with the Trust's Scheme of Delegation (SoD).

3. The PMC will consider evidence-based information (see list above) including appraisal / PDR reports, confirming if objectives have been met, partially met or not met, alongside if great performance, role specific changes / factors or any relevant changes. .

4. The PMC will provide the Trust Board a summary of annual evaluation including the extent to which individuals' objectives have been met along with their recommendations based on the evidence pack.

5. Inclusion of an independent education professional in the CEO performance evaluation to inform the PMC is at the discretion of the PMC.

5. APPEALS PROCESS

Executives dissatisfied with pay progression decisions may seek informal resolution during the PDR process or initiate formal appeals in two stages involving written representation and hearings before the Performance Management Committee, with rights to representation and procedural fairness.

Stage One Formal Appeal

Following the final pay determination by the Performance Management Committee supported by the Trust Board in line with the Trust's Scheme of Delegation (SoD), the executive leader may seek a review of that determination if they believe that the person or committee by whom the decision was made:

- Incorrectly applied this policy
- Incorrectly applied a provision of the STPCD or JNC
- failed to have proper regard for statutory guidance
- failed to take proper account of relevant evidence
- took account of irrelevant or inaccurate evidence
- was biased or;
- unlawfully discriminated against the executive leader.

If the executive leader believes that an incorrect recommendation/determination has been made, they may make representation to the Performance Management Committee following receipt of their pay statement or letter.

To begin the process, they should set down in writing to the Trust's Governance professional lead within 10 working days of the decision, the grounds for their disagreement with the pay determination.

The executive leader will be given the opportunity to make representations, including presenting evidence, calling witnesses, and the opportunity to ask questions at a meeting with the Performance Management Committee, which should be convened within 10 working days of receipt of the written disagreement.

The Responsible Officer, determined by the PMC, will attend to provide professional advice in respect of the management case.

The executive leader is entitled to be accompanied by a work colleague or recognised Trade Union/Professional Association representative at the meeting. A member of the HR Team may be present to provide professional policy/procedural guidance to the decision maker(s).

Following the meeting the outcome will be provided in writing, within 5 working days of the decision

of the Committee and confirming their right of appeal.

Stage Two Formal Appeal

If an executive leader wishes to appeal against the decision made at Stage One, they should Notify the Trust's Governance Clerk , in writing within 10 working days of the written decision.

The appeal should be heard by two Trustees (the Appeal Committee), who have not been involved in the original determination in line with the Trust's Scheme of Delegation (SoD), normally within 20 working days of the receipt of the written appeal.

The executive leader will be given the opportunity to present their appeal in person or online and is entitled to be accompanied by a work colleague or recognised Trade Union/Professional Association representative at the meeting. A member of the HR Team may be present to provide professional guidance to the decision maker(s).

The timing and location of the formal meeting must be reasonable. 5 working days' notice should be given of the appeal hearing and the notification of the appeal hearing will include:

- the date, time and place of the hearing
- the name(s) of the person(s) who will hear the case, and the representative of HR who will be advising the Appeal Committee
- who will respond to the appeal (the representative of the PMC)
- copies of documents and any other written material or evidence that is relevant
- the names of any witnesses to be called (if any)
- confirmation of the executive leader's right to call witnesses
- the right to submit any documentation within three working days prior to the appeal hearing
- a copy of this policy
- the fact that the appeal hearing may take place in their absence if they are unable to attend without a satisfactory explanation

If exceptional reasons are offered in advance as to why the executive leader is unable to attend, at least one attempt will be made to rearrange the hearing so that they may be present. Other than in exceptional circumstances, where attendance is not possible arrangements should be made for representation or to provide written submissions to the appeal hearing.

An accurate account of the hearing will be made.

During the hearing, the parties will be able to question each other, and the Appeal Committee is permitted to ask exploratory questions. Either side will be entitled to request an adjournment for consultation and any reasonable request should be allowed. Witnesses will attend only the part of the hearing where they are required to give evidence and answer questions.

No conclusion should be reached until representations from all parties have been considered. The decision will be given in writing within 5 working days and include details of the evidence considered and the reasons for the decision.

The HR Team will provide advice and support to the Responsible Officer and any other manager/Governor/Trustee involved in the application of this policy at any stage. As part of which they may attend any meetings / hearings under this policy.

6. PENSION ARRANGEMENTS

To legally qualify for the Teachers Pension Scheme (TPS), an executive *must* actively perform 'teaching work' (such as planning lessons, delivering lessons, or formally assessing/reporting on student attainment). The executive job description must retain a clear line of direct responsibility for educational delivery, curriculum strategy, or reporting on pupil progress across the trust. If this is entirely delegated to individual headteachers, the executive falls outside the scheme.

If an executive is purely in a financial or administrative role they would not qualify for 'teaching work' and should automatically join the Local Government Pension Scheme (LGPS).

Upon appointing an Executive to a role, the Trust will perform a one off formal audit of the executive's job description to ensure they meet the 'teaching work' academic criteria before assigning TPS eligibility, otherwise defaulting them to the LGPS.

7. POLICY REVIEW & LINKS

This policy is reviewed annually by the trust. We will monitor the application and outcomes of this policy to ensure it is working effectively.

POLICY LINKS

1. Trust Appraisal Policy.
2. Trust Pay Policy.

APPENDIX 1 - Executive Pay Ranges

CEO (2026)			
Initio Scale Point Zone	**Minimum Salary**	**Maximum Salary**	**Compa-Ratio Range**
Scale Point Zone 1	£129,000	£145,000	80% - 88%
Scale Point Zone 2	£145,000	£155,000	89% - 96%
Scale Point Zone 3	£160,000	£170,000	97% - 104%
Scale Point Zone 4	£170,000	£180,000	105% - 112%
Scale Point Zone 5	£182,500	£192,500	113% - 120%

Executive on STPCD (26/27)	
Leadership Point 35	£123,528
Leadership Point 36	£126,587
Leadership Point 37	£129,733
Leadership Point 38	£132,943
Leadership Point 39	£136,184
Leadership Point 40	£139,581
Leadership Point 41	£143,069

Non-STPCD Executive (26/27)		
Initio Scale Point	**Executive Band 1**	**Executive Band 2**
Scale Point 1 (starting point)	£85,285	
Scale Point 2	£88,483	
Scale Point 3	£91,681	
Scale Point 4	£94,879	
Scale Point 5	£98,078	
Scale Point 6 (New Interim)	£101,276	£101,276 *(Entry Point)*
Scale Point 7		£103,300
Scale Point 8		£107,432
Scale Point 9		£111,048
Scale Point 10		£115,180
Scale Point 11		£118,795

The Trust operates a unified Executive Pay Spine to ensure equity, robust benchmarking, and transparency across all non-STPCD and executive-level roles.

To protect the statutory right to privacy and anonymity of individual post-holders within a compact Executive Leadership Team, roles are mapped to overlapping broader bands rather than individualised spot-salaries.

Progression within any band is non-automatic and subject to the annual performance and objective-setting framework overseen by the Performance Management Committee (PMC).

Appendix 2

Equality Impact Assessment/ Analysis (EIA)

Step 1: Scoping and Identifying the Aims

School/Service	People Department
Title of Change:	Executive Pay Policy
What are you completing this EIA for?	Policy
Is this a new or existing activity or change?	Existing
What are the main aims / objectives of the changes? What is the context for this EIA? e.g., policy, practice, service, curriculum proposal or project? Why is the activity/change needed? E.g., The policy or practice affect different "protected groups" differently?, enhancing of services, education	Ensure policy is still relevant and the most current legislation is being adhered to.
Name/s of people and Date undertaking analysis:	Shani Davies, Director People & Culture
Who will be affected by this activity/change? eg pupils/students, service users, employees, wider community	All Staff in scope of this policy
Does it relate to an area with known inequalities? E.g., access to service for disabled people, pupils/students, vulnerable pupils/students, SEND, racist bullying etc.	
EIA Schedule When will the EIA be reviewed?	

Step 2: Assessing the Impact

Detail any positive or negative impacts of this document /policy on pupils/students and staff in the box below. If there is no impact, please select "not applicable"

Protected Characteristic	Positive Impact(s)	Negative Impact(s)	NA	Action to address negative impact: *(e.g. adjustment to the policy)*
Sex consider issues for: men and women, non-binary.	Y			
Gender reassignment E.g. privacy of data and harassment	Y			
Disability e.g., attitudes, physical, social barriers, visible and non-immediately visible disabilities, neurodivergence, learning disability	Y			
Age e.g., consider all ages but there may be some issues that relate for example to older people/younger people	Y			
Sexual Orientation **consider** heterosexual as well as lesbian, gay and bisexual (and other sexual orientations)	Y			
Pregnancy and maternity e.g., childcare, working arrangements, part time working	Y			
Marriage and civil partnership	Y			
Religion or belief	Y			

consider religions, beliefs, or no belief				
Ethnicity / Race e.g., language barriers, different ethnic groups/nationalities	Y			
Socio-economic factors e.g., resident status – socio economic/low-income groups, migrants, carers, impacts on children and families (please state)	Y			
Mental health e.g. short term, long term, acute, fluctuating mental health conditions, impacts	Y			

If you answer yes to any of the following, you MUST complete the evidence column explaining what information you have considered which has led you to reach this decision.

Assessment Questions	Yes / No	Please document evidence / any mitigations
In consideration of your document development, did you consult with others, for example, external organisations, employees, pupils/students, carers or community groups?	Yes	Staff and Trade Unions
Have you taken into consideration any regulations, professional standards?	Yes	Academy Trust Handbook, DfE Setting executives salary guidance, ACAS, STPCD, Equality Act 2010, Green Book/NJC, CST

Step 3: Review, Risk and Action Plans

Low – No major change	Medium - Adjust the policy	High – Stop and remove
The activity is robust and there is no potential for discrimination, and you have taken all appropriate opportunities to advance and foster relations between groups.	This involves taking steps to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential effect.	If there are adverse effects that are not justified and cannot be mitigated, you will want to consider stopping the policy/project altogether. If the activity shows unlawful discrimination, it must be removed or changed.

How would you rate the overall level of impact / risk to the school / service / Trust if no action was taken?	Low	Medium	High
	x☐	☐	☐
What action needs to be taken to reduce or eliminate the negative impact?	N/A		
Who will be responsible for monitoring and regular review of the document / policy / change?	Director People & Culture		

Step 4: Authorisation and sign off

I am satisfied that all available evidence has been accurately assessed for any potential impact on pupils/students and employees with protected characteristics in the scope of this project / change / policy / procedure / practice / activity. Mitigation, where appropriate has been identified and dealt with accordingly.

Equality Assessor:	***Shani Davies***	***Date:***	*27/05/26*