



Executive Pay Policy

Approved by:

THE TRUST BOARD OF GREENSAND MULTI ACADEMY TRUST

Date: 30th January 2025

Last reviewed on: Autumn 2025

Next review due by: Autumn 2026

1. Purpose & Aims

In accordance with the relevant provisions of the Academy Trust Handbook 2025 (see the extract included as part of **Appendix 1**), the Trust Board (“the Trust Board”) of Greensand Multi Academy Trust (“the Trust”) has resolved to adopt this Executive Pay Policy (“the Policy”) in order to ensure that:-

- the Trust has a clear and robust process for reviewing and setting executive pay.
- Trustees can be confident that they have seen all relevant evidence and documentation enabling them to come to an informed, transparent, independent, fair, proportionate, justifiable and defensible decision when reviewing and setting executive pay.

This Policy is to be read in conjunction with the Trust’s Pay Policy; however, where there is any inconsistency between the two policies, this Policy shall take precedence.

2. Application

This Policy is intended to apply to the following roles (collectively, “Executive Officer(s)”):-

- the Chief Executive Officer (“CEO”); and
- the Finance & Operations Director (“FOD”).

The Trust Board reserves the right to amend this policy to include other roles within the definition of “Executive Officer” as may be necessary in the future.

3. Process for Reviewing (and Setting) Executive Pay

The following process must be followed when reviewing (and, where relevant, setting) the pay for Executive Officers.

The Trust Board has delegated responsibility for undertaking an annual review of executive pay to the Trust’s Pay & HR Committee (“the Committee”). However, the final decision on the setting of executive pay remains with the Trust Board.

The Committee should be made up of at least three appropriately skilled and experienced Trustees - ideally with backgrounds in finance, HR, or public sector governance.

No Executive Officer may sit on the Committee when the Committee is reviewing their own executive pay. However:-

- Executive Officers are entitled (and encouraged) to make representations relevant to their role in order to provide the Committee with the full information they require in order to review their executive pay, as outlined in **Appendix 2**; and
- the CEO can (and is encouraged) to play a full part in assisting the Committee in its review of the pay of other Executive Officers, particularly where the other Executive Officers are line managed by the CEO.

The Committee should meet to review executive pay in the second half of the Autumn Term each year (after national teacher and support staff pay awards have been announced and performance reviews are completed, and before the last Trust Board meeting of the Autumn Term).

Any increase in executive pay will be backdated to 1st September, in line with all other members of staff.

Subject to the agreement of the Committee, the FOD and CEO can expect to progress within the agreed pay range annually, until they reach the maximum pay point assigned to their role.

Should the Committee consider that there have been exceptional circumstances affecting an Executive Officer's role and responsibilities, they may, in their sole discretion, elect to complete an additional review of executive pay outside of the usual Autumn Term window.

Where required, in reviewing the executive pay ranges, the Committee must consider:-

- characteristics of the Trust;
- factors affecting the degree of challenge in the Executive Officer's role;
- academic performance;
- educational challenge;
- financial performance;
- cost of the total remuneration package (including pension) and affordability;
- experience of the individual;
- performance management and salary increases;
- external benchmarking;
- public scrutiny; and
- other considerations (e.g. ratios, gender pay gap, location, succession planning, fixed term contracts).

To assist in considering all of these factors, the Committee must, as a minimum, refer to the table attached as **Appendix 2**, which provides a non-exhaustive list of evidence the Committee should see and questions the Committee should ask itself.

In completing its review of executive pay, the Committee shall also have consideration for the annual cost of living award; this will be decided and applied equitably to all Executive Officers that sit outside of the Teacher and Support Staff salary ranges. The award will be determined with due regard to percentage increases agreed for both the support and teaching workforce.

The Committee should also draw on independent external advice when considering benchmarking and sector trends.

The Committee should make recommendations for any changes to executive pay to the Trust Board in the Trust Board's last meeting of the Autumn Term.

The Trust Board's decision-making process must be well-documented. This includes:

- the methodology used in reaching the decision;
- the rationale for the decision;
- the external advice and benchmarking data used;
- how the pay policy was applied; and
- any dissent or challenge discussed during the decision.

The Trust Board must approve changes to executive pay before they take effect.

Following the Trust Board giving its approval to any changes to executive pay, the FOD will be responsible for ensuring any changes in pay or remuneration are advised to and implemented by HR/payroll.

4. Pay Appeals

In the event of an Executive Officer wishing to seek reconsideration of the Committee's decision on executive pay, they should first attempt to resolve the matter informally through discussion with any two members of the Committee ("the Informal Meeting"), who will address any queries the Executive Officer has and explain the reasons for the Committee's decision.

If the Executive Officer is unable to resolve their concerns informally under paragraph 4.1, they should set out their complaint in writing and submit this to the [Lead Governance Professional] within [10 school days] of the Informal Meeting. The [Lead Governance Professional] will use best endeavours to convene a meeting within 10 school days with three Trustees who were not members of the Committee ("the Appeal Panel"). The Appeal Panel shall appoint a Chair. An agenda for hearing a pay appeal is included as **Appendix 3**. At the meeting, the Appeal Panel will consider the Executive Officer's concerns and afford them the opportunity to make representations in person, accompanied by a trade union representative or work colleague if desired. The Executive Officer should be informed, in writing, of the outcome of the meeting within 10 school days. There is no further right to appeal.

5. Independence

The Committee accepts that absolute independence in any review process may not always be possible. In circumstances where this may be the case, the Committee undertakes to take all reasonable steps to protect the integrity of the process and ensure any challenges to its independence are limited and justifiable.

6. Policy Review

This Policy will be reviewed by the Trust Board annually.

Appendix 1 – Extract from the Academy Trust Handbook 2025

Note: Compliance with the Academy Trust Handbook is a condition of the Trust's funding agreement. The Handbook sets out the financial management, control and reporting requirements that apply to all multi academy trusts.

Setting executive pay

2.27. The board of trustees must ensure its decisions about levels of executive pay (including salary and any other benefits) follow a robust evidence-based process and are a reasonable and defensible reflection of the individual's role and responsibilities. No individual can be involved in deciding their remuneration. Decisions about executive pay may be challenged by DfE.

2.28. The board must discharge its responsibilities effectively, ensuring its approach to, and levels of, pay and benefits is transparent, proportionate and defensible. This must be documented in an agreed pay policy, which sets out the process for determining executive pay and includes:

- independent scrutiny by the board***
- robust decision-making that demonstrates justifiable pay***
- proportionality – that pay and benefits represent good value for money and are defensible relative to the public sector market***
- documented decision-making with rationale and approval by the board***
- a basic presumption that executive pay and benefits should not increase at a faster rate than that of teachers, in individual years and over the longer term***

APPENDIX 2 – Questions for Trustees to Consider When Reviewing Executive Pay

Note: This document is primarily based on the DfE’s Setting executive salaries: guidance for academy trusts (November 2023), and incorporates some additional considerations pursuant to a review of resources from the NGA, CST and other MATs’ executive pay policies. It is intended as a document to guide Trustees’ discussions in reviewing executive pay, and to ensure that appropriate evidence is considered.

EVIDENCE TO CONSIDER	QUESTION	NOTES
CHARACTERISTICS OF THE TRUST		
<p>To be provided by: CEO</p> <ul style="list-style-type: none"> • Numbers of schools, pupils and staff • Structure of Executive Team/SLT, including whether each school has its own substantive HT • Range of provision • The quality of provision and their financial effectiveness • Types of school (e.g. infant, junior, primary, secondary) • How many sites are involved, what is the distance between them and what are their condition. • Other factors (e.g. COIN or Speech & Language centres). <p>Trustees may wish to consider using STCPD principles.</p>	Does the size and provision of the Trust provide any additional challenges?	
	How do similarly sized trusts remunerate their executive leaders?	
FACTORS AFFECTING THE DEGREE OF CHALLENGE IN THE ROLE		
<p>To be provided by: Executive Officers</p> <p>Any information providing evidence on:-</p> <ul style="list-style-type: none"> • permanent role and responsibilities that may not be typical of the role in other organisations • existing significant concerns at the Trust • a role in leading future plans for the Trust (for example, expansion) 	Does the level of complexity and challenge warrant a higher salary?	
	How do the responsibilities of executives compare with trusts of a similar size and complexity?	
	How many members of staff is the individual directly line managing?	

<ul style="list-style-type: none"> • additional accountabilities (for example, leading a teaching school alliance) • responsibility for engaging the local community 	<p>Does the type of school present additional challenges to that of an academy trust of a similar size? [This question was moved from Characteristics of the Trust]</p>	
ACADEMIC PERFORMANCE (Note: The level of impact this consideration may have is likely to vary depending on the role being considered).		
<p>To be provided by: CEO / Education & Standards Committee</p> <ul style="list-style-type: none"> • Pupil outcomes (including <u>key stage 2 headline</u> (primary) and <u>key stage 4 headline</u> measures (secondary)) and level of improvement required. • Data showing levels of progress. • Ofsted ratings. • Long-/short-term educational targets of the Trust 	<p>How does performance compare with the national average?</p>	
	<p>How does performance compare with the schools of trusts in the same area or with similar context, such as pupil number or trust size?</p>	
EDUCATIONAL CHALLENGE		
<p>To be provided by: CEO / Education & Standards Committee</p> <ul style="list-style-type: none"> • % SEND pupils • % FSM • % EAL pupils • Levels of deprivation • Number of looked after children 	<p>Is the level of complexity and challenge significantly above other similar sized trusts?</p>	
FINANCIAL PERFORMANCE		
<p>To be provided by: FOD / FARC</p> <ul style="list-style-type: none"> • The Trust's income / reserves / deficit / surplus position • Financial projections • The auditor's view of the Trust, and the Trust's progress towards implementing audit recommendations. 	<p>Is the Trust in a financially stable position – both current and forecast?</p>	
	<p>What level of improvement (if any) is required to reach a balanced budget position?</p>	
	<p>How does financial performance compare with similarly sized trusts?</p>	

<ul style="list-style-type: none"> Requirement for additional financial support Where appropriate, whether innovative and creative solutions have been considered to balance the budget. 	Has the Trust delivered to its financial forecast under the management of the individual? ¹	
	Is the Trust forecasting a deficit in the forthcoming 3-year period, in excess of the operating surpluses generated in the previous 3 years? ¹	
	Have the Trust's pupil number projections been reflected in the annual census? ¹	
	If the financial position of the Trust has deteriorated due to poor management by the accounting officer, is a downwards adjustment to salary appropriate (assuming this is provided for in the employment contract)?	
COST OF TOTAL REMUNERATION PACKAGE (INCLUDING PENSIONS)		
To be provided by: HR Director <ul style="list-style-type: none"> Evidence of the increases in rates of teachers' pay Evidence of annual cost of living awards granted to non-executive staff Performance-related pay and other bonuses awarded during the financial year Compensation for loss of office Any sums paid under any pension scheme in relation to employment with the provider Other taxable benefits 	What is the maximum level of remuneration available, regardless of the individual's performance?	
	If the individual is on a part time or fixed term contract, is the full time equivalent (FTE) still reasonable within the context of the Trust?	
	Where the individual is also a Trustee, could expenses be considered a conflict of interests?	
	Is the package affordable in the medium to long term?	
	Would any non-financial benefits appropriate (e.g. increase in holiday allowance)?	

¹ The DfE identifies these questions as particularly pertinent when reviewing existing salaries.

<ul style="list-style-type: none"> • Pension contributions and payments in lieu of pension contributions² • Salary sacrifice arrangements • Non-taxable benefits that are available only to senior members of staff • Other remuneration and the cost to the provider, for example car allowance • Non-teaching staff should not be on a teaching employment contract: <ul style="list-style-type: none"> • they should not be entitled to salary protection to prevent or delay a reasonable reduction in salary • 14 weeks of annual leave should not be standard in contracts of non-teaching staff • notice periods for non-teaching staff should not exceed 3 months • Information from representatives of any unions of which the Executive Officers are members. 		
EXPERIENCE OF THE INDIVIDUAL (Note: Trustees should explore any additional expertise/experience which the individual brings to the role which adds value to the leadership team)		
To be provided by: Executive Officers	Is this level of expertise essential for the role?	
	What value does this additional expertise bring?	

² The Teachers’ Pensions Regulation 2010 and the Teachers’ Pension Scheme Regulations 2014 mean academy trusts must put anybody who meets the criteria for the Teachers’ Pension Scheme (TPS) into the scheme following the guidance that explains the eligibility of senior leaders. Eligibility of leaders is for the Trust to decide. Where employees of the Trust are not eligible for the TPS they may become eligible for the Local Government Pension Scheme. The individual may choose to opt out of these pension schemes.

<ul style="list-style-type: none"> • Previous significant experience in improving educational and/or financial outcomes • School Business Management qualifications and experience • National Leaders of Education/National Leaders of Further Education • Other relevant qualifications 	<p>Remuneration levels of other individuals with this level of expertise (within the Trust, or within other similarly sized trusts).</p>	
PERFORMANCE MANAGEMENT AND SALARY INCREASES		
<p>To be provided by: Appraisal documentation (360° where available, including staff satisfaction data)</p> <p>Decisions to award pay progression must be related to the individual's performance, as assessed through the Trust's appraisal arrangements. The use of funds intended for education to pay large bonuses is a matter that has come under much scrutiny. It is important that you fully justify any potentially contentious decisions.</p> <p>Pay increases should not be awarded automatically. Instead they should be linked to a clear and measurable set of key performance indicators within the parameters of the agreed contractual arrangements. Trustees must be satisfied that there is an evident link between the levels of achievement of the individual and across the trust and pay progression. Pay ranges should only be reviewed when there have been significant changes to responsibilities and not just because the top of the current range has been reached.</p> <p>Pay increases should always be considered in the context of the wider organisation. Rewards must be applied appropriately at all levels. Executive leaders are not solely responsible for the performance outcomes at an academy trust.</p>	<p>Does the level of staff turnover seem high and potentially indicate poor management practice?</p>	

<p>It is important that awards for exceptional performance be applied across all levels. Executive leadership pay should not increase at a faster rate of that of teaching staff. Consideration should be given to the rate of increase across the board.</p>		
BENCHMARKING		
<p>To be provided by: External benchmarking (coordinated by HR Director) Crucial to consider the <u>context of the Trust and responsibilities of the role</u>, and not just compare the remuneration of equivalent job titles (e.g. benchmarking using other trust’s job adverts is inappropriate). Where the Trust is at the high end of the of the benchmarking scale, Trustees must ensure they have clear reasoning.</p>	<p>Have any other local/similarly sized trusts recently recruited?</p>	
	<p>Are there any organisations that may be able to provide benchmarking support?</p>	
	<p>Is external independent advice required? If it has been sought, what are the recommendations, and has the benchmarking exercise been completed with the context of the role and the Trust in mind?</p>	
PUBLIC SCRUTINY		
<p>To be provided by: HR Director</p> <ul style="list-style-type: none"> • Levels of teacher pay within the Trust – and how your proposed salary compares to these as the ATH states “executive pay and benefits should not increase at a faster rate than that of teachers, in individual years and over the longer term” <p>To be provided by: Pay & HR Committee</p> <ul style="list-style-type: none"> • Salary levels in the local area • National salary levels • Justification in response to DfE engagement about salaries • Local and national media interest in salaries • Local economy 	<p>Does the salary demonstrate value for money and can you publicly justify paying the level? Is it in the best interest of the Trust as a charity?</p>	
	<p>If the individual is requesting a higher salary, do they have the right interests?</p>	
	<p>Is the remuneration package proportionate and defensible in relation the public sector market?</p>	
	<p>If disclosed to a third party, would the absolute value of pay award or proposed uplift in pay risk damaging the reputation of the Trust?</p>	
OTHER CONSIDERATIONS (as relevant/appropriate)		

<p>Ratios (NB This will not be a routine part of the process, but the Committee reserves its right to refer to it in future if necessary). To be provided by: HR Director</p> <ul style="list-style-type: none"> • Cost of salary per pupil when benchmarked against comparable trusts • Cost of total leadership team compared to trusts of a similar size • % difference between highest and lowest paid staff • Rate of pay increase across the trust • Senior leadership team cost as a % of total staff cost and as a % of funding received 	<p>Is external independent advice required to determine a fair ratio?</p>	
<p>Gender Pay Gap Reporting To be provided by: HR Director Trusts are encouraged to consider evidence-based actions to address gender pay differences, including:</p> <ul style="list-style-type: none"> • ensuring transparency to promotion, pay and reward processes • clearly communicating the salary range on offer as the evidence indicates that women are less likely to negotiate their pay compared to men <p>There is evidence that female CEOs are underpaid compared to male counterparts. (Taken from NGA guidance).</p>		
<p>Location To be provided by: n/a</p> <ul style="list-style-type: none"> • Whether the Trust or its academies need to recruit to central London • Whether the Trust is in a sparse/rural setting (balanced against the cost of housing in that area) 	<p>Is it necessary to increase the salary level due to location?</p>	
	<p>Are there cheaper alternatives to increasing the base salary (for example, subsidising transport)?</p>	
	<p>How does the salary level compare to trusts of a similar size facing similar challenges?</p>	

<ul style="list-style-type: none"> • Whether the location results in additional financial burdens for the Trust as a whole 		
<p>Succession Planning To be provided by: Committee to decide when need arises. It is important to consider succession planning during recruitment, and not just when seeking a replacement. Individuals should not automatically be recruited at the same level as their predecessor. Evidence to consider</p> <ul style="list-style-type: none"> • Whether severance payments are reasonable and justifiable • Intended length of service • Required notice period • Length of time required to recruit a replacement 		
<p>Fixed Term Contracts To be provided by: Committee to decide when need arises. Trustees should further consider the most appropriate contractual agreement for each individual. Where Trustees are looking for an individual to achieve a specific purpose at the Trust over a pre-determined timescale, it may be more appropriate to recruit on a fixed term contract. Evidence to consider</p> <ul style="list-style-type: none"> • Any intended outcomes of recruiting the individual (outside of business as usual responsibilities) • Specific problems at the Trust that are going to be addressed through the recruitment of this individual 	<p>Are there time restrictions on the responsibilities of the individual?</p>	
	<p>What length of contract would be appropriate for achieving the desired aims?</p>	

Appendix 3 – Draft Agenda for Executive Pay Hearings

(LOCATION)

(DATE)

(TIME)

1. Introduction of all those present.
2. The appellant and/or their representative to present their reasons for appeal with any supporting evidence, and call witnesses* if applicable.
3. The Chair of the Appeal Panel to ask questions of the appellant and witnesses* if applicable.
4. A nominated member of the Pay & HR Committee (“the Committee Nominee”) who assisted in making the decision on the Executive Officer’s pay to respond to the appellant’s appeal, and call witnesses* if applicable.
5. The appellant and/or his/her representative to ask questions of the Committee Nominee.
6. The appellant and/or their representative to summarise.
7. The Chair of the Appeal Panel to summarise.
8. Hearing to be adjourned whilst all parties, except the Appeal Panel, their adviser and the Clerk, leave the room.
9. The parties will be recalled and if the Appeal Panel has reached a decision, this will be confirmed.

*Witnesses will usually be called one at a time and will be questioned by the other party and the Appeal Panel, if necessary, before being asked to leave and the next witness called in.