



EDITH STEIN **CATHOLIC ACADEMY TRUST**

EXECUTIVE PAY POLICY

APPROVED BY TRUSTEES	July 2025
SCRUTINISED BY LOCAL GOVERNING BODY / LOCAL GOVERNING BODY SUB COMMITTEE	July 2025
DATE LAST REVIEWED	June 2025
MEMBER OF STAFF RESPONSIBLE	Chair of Pay Committee
STATUTORY / NON-STATUTORY	Statutory



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Policy Amendments

Version Date	Section / Page	Amendments
June 2025		New Policy

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1.0 Introduction

- 1.1 Edith Stein Multi Academy Trust (ESCAT) directors recognise that our staff are essential to the mission of providing a Christ-centered education rooted in the teachings of the Catholic Church within our schools. This pay policy reflects our commitment to justice, dignity, and the common good, ensuring that compensation is fair, transparent, and consistent with our values.
- 1.2 We aim to support the spiritual, professional, and personal well-being of ESCAT employees while maintaining responsible stewardship of our school's resources. Through this policy, we affirm our dedication to fostering a workplace where all are respected, supported, and encouraged to grow in their vocation as educators and role models.
- 1.3 Directors understand their duty to ensure that the most competent and skilled people are in leadership positions; however, it also understands that salaries must be:
 - Justifiable
 - In the best interests of the Trust
 - Reflective of the individual's responsibilities
 - Demonstrative of value for money
- 1.4 This policy aims to outline how ESCAT ensures that executive salaries reflect, and are underpinned by, the seven principles of public life:
 - Selflessness
 - Integrity
 - Objectivity
 - Accountability
 - Openness
 - Honesty
 - Leadership
- 1.5 ESCAT will always seek to make decisions about pay which enable Directors to be confident about, and accountable for, these decisions.
- 1.6 For the purposes of this policy 'Executive Leader' has been used to define anyone who is primarily a member of non-teaching staff in a leadership role in which they are held to account for the standards across the Academy Trust. Executive Leaders follow the Terms and Conditions contained within the Support Staff 'Green Book' other than pay and grading which is determined by this policy.

2.0 Legal Framework

- 2.1 This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:
 - Charity Commission (2022) 'Trustee expenses and payments'
 - Committee on Standards in Public Life (1995) 'The Seven Principles of Public Life'
 - DfE (2023) 'Implementing your school's approach to pay'
 - ESFA (2023) 'Setting executive salaries: guidance for academy trusts'
 - Academy Trust handbook 2024'
 - ESFA (2024) 'Academies accounts direction 2023 to 2024'
 - Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017
- 2.2 This policy operates in conjunction with the following policies:
 - ESCAT pay statement
 - Anti-fraud and Corruption Policy
 - Gifts, Hospitality and Anti-bribery Policy
 - Trustee Expenses Policy
 - Risk Management Policy

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3.0 Roles and responsibilities

- 3.1 Directors will be responsible for:
- Ensuring that its decisions on executive pay follow a robust evidence-based process and are reflective of the individual's role and responsibilities.
 - Discharging its responsibilities effectively, whilst ensuring its approach to pay and benefits is transparent, proportionate and justifiable.
 - Ensuring that decisions about executive pay and benefits reflect independent and objective scrutiny by the Board and that conflicts of interest are avoided.
 - Ensuring that factors in determining pay and benefits are clear, including whether educational and financial performance considerations, and the degree of challenge in the role have been taken into account.
 - Ensuring that pay and benefits represent good value for money and are defensible relative to the public sector market.
 - Ensuring the Board is sighted on broader business interests held by senior executives and is satisfied that payments do not undermine the transparency requirements for disclosing pay in accordance with the Academies Accounts direction.
 - Ensuring documentation, including the rationale behind decisions relating to executive pay, is maintained.
 - Maintaining the presumption that executive pay and benefits should not increase at a faster rate than that of teachers.
 - Delegating responsibilities to the Pay Committee as appropriate.
- 3.2 The Pay Committee will be responsible for:
- Ensuring no individual is involved in deciding their own remuneration.
 - Approving the design of, and determining performance targets for, any performance-related element of executive pay.
 - Recommending and monitoring executive pay and the first layer of executive management below.
 - Determining and recommending the wider pay policy to Directors.
 - Carefully managing conflicts of interest and avoiding them wherever possible.
 - Taking advice, making a record and making decisions when a conflict of interest arises.
 - Organising pay review meetings for the CEO.
 - Attending other relevant meetings related to executive pay.
 - Reviewing the performance of executive leaders to inform pay reviews.
- 3.3 The Pay Committee shall comprise of three Directors governed by terms of reference agreed with the ESCAT Trust Board.
- 3.4 Executive Leaders will be responsible for:
- Attending remuneration committee meetings when invited to advise on broader matters relating to pay.
 - Providing supporting documentation for Directors
 - Absenting themselves from discussions related to their own pay.
- 3.5 The Accounting Officer will be responsible for adjusting pay levels where appropriate.

4.0 Trust aims when setting pay

- 4.1 ESCAT will always aim to attract and retain individuals with the required values, experience, knowledge and skills required to lead its schools. ESCAT will, therefore, ensure that executive pay and benefits remain competitive in order to achieve targets and support pupils to reach their potential.

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- 4.2 ESCAT will seek to ensure that salaries are fair in relation to individuals' skills and experience and that this is upheld across ESCAT.
- 4.3 ESCAT will remain up-to-date with average executive salaries in other trusts to ensure that pay remains competitive and measured to executive leaders' roles and responsibilities.

5.0 Setting pay levels

5.1 Who sets pay levels?

- 5.1.1 The ESCAT Board holds the responsibility of determining the pay levels for executive members. In carrying out this duty, the Board may seek guidance from the Pay Committee or other relevant professionals to ensure informed decision-making.
- 5.1.2 Pay will generally be established within predefined pay ranges, except in exceptional circumstances. For example, if the Board encounters difficulties in attracting suitable candidates at the established pay level, despite extensive national advertising efforts, they may consider adjusting the upper pay limit. Furthermore, upon the successful appointment of a candidate, the agreed appointment salary should provide adequate headroom to accommodate potential performance-related increments.

5.2 Educational challenge

- 5.2.1 When making decisions about pay levels, ESCAT will factor in the characteristics of schools¹ and any educational challenge resulting from our unique identity and the circumstances of individual school.
- 5.2.2 ESCAT will consider whether it requires additional expertise, as a result of particular challenges in its schools, to deliver a curriculum that meets the needs of pupils. When considering whether this applies to ESCAT, the following will be considered:
- Percentage of pupils with SEND
 - Percentage of pupils eligible for FSM
 - Percentage of pupils with EAL
 - Level of deprivation
 - Number of LAC
- 5.2.3 ESCAT will seek to establish whether the level of complexity and challenge is significantly above other similarly-sized trusts.

5.3 Broader challenge

- 5.3.1 ESCAT will consider whether the role presents additional challenges outside of those that would normally be expected of this position.
- 5.3.2 ESCAT will consider the following:
- Permanent responsibilities that may not be typical of the role in other organisations
 - Existing significant concerns at ESCAT
 - Whether there is a role in leading future plans for ESCAT, eg. expansion
 - Additional accountabilities
 - Responsibility for engaging the local community
- 5.3.3 ESCAT will seek to establish the level of complexity and challenge and whether it warrants a higher salary alongside how the responsibilities of executives compare with trusts of a similar size and performance

¹ See Appendix 1

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5.4 Additional expertise

- 5.4.1 Remuneration will be considered alongside any additional expertise that the individual may bring to the role which will add value to the leadership team.
- 5.4.2 ESCAT will consider the following evidence:
- Previous significant experience in improving educational and financial outcomes
 - Qualifications in Catholic leadership
 - School Business Management qualifications and experience
 - National Leaders of Education or National Leaders of Further Education
 - Other relevant qualifications
- 5.4.3 ESCAT will seek to establish whether the level of expertise is essential for the role, what value the expertise brings and the remuneration levels of other individuals with this level of expertise either within ESCAT or within similarly-sized trusts.

5.5 Total cost of remuneration package

- 5.5.1 The total remuneration package will be considered alongside the cost of the basic salary.
- 5.5.2 ESCAT will consider the following:
- Performance-related pay and other bonuses awarded during the financial year
 - Pension contributions and payments in lieu of pension contributions
 - Salary sacrifice arrangements
 - Compensation for loss of office
 - Any sums paid under pension scheme in relation to employment with the provider
 - Other taxable benefits
 - Non-taxable benefits that are available only to senior members of staff
 - Other remuneration and the cost to the provider, eg. travel allowance
- 5.5.3 Where an Executive Leader is on a part time or fixed term contract, ESCAT Board will ensure the full-time equivalent (FTE) is still reasonable within the context of the post. Any additional work beyond the part time equivalent contract will be paid to the post holder prorate the salary rate.
- 5.5.4 ESCAT will consider future plans for ESCAT and engagement with the local community when setting executive pay. ESCAT will ensure that executive pay is proportionate and defensible to the public sector market, and reflects value for money. Public perception and the public benefit of decisions made by ESCAT will be considered when making salary decisions.
- 5.5.5 The following will be considered with public interest in mind:
- Salary levels in the local area
 - Market rates
 - National salary levels
 - Justification in response to DfE challenge of salaries over £100,000
 - Local and national media interest in salaries
 - Differentials between executive salaries and salaries in school, for example, Headteacher or Business Managers
 - The local economy
- 5.5.6 ESCAT will publish on its website, in a readily accessible form, the number of employees whose benefits exceeded £100,000, in £10,000 bandings, for the previous year ended 31 August. These benefits include:
- Salary
 - Employers' pension contributions
 - Other taxable benefits

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- Termination payments

5.5.7 Where ESCAT has entered into an off-payroll arrangement with an individual who is not an employee, the amount paid for their work for ESCAT will also be included in the website disclosure where payment exceeds £100,000.

6.0 Pay scales

6.1 For 2025 through to 2026 the following FTE equivalent pay scales have been set for Executive Leaders, based on 2024-2025 rates:

Role	Minimum	Maximum
CEO	£100000	£152000
COO and CFO	£79000	£131000

7.0 Gender pay gap

7.1 ESCAT will publish gender pay gap figures by 30 March annually on the government's reporting portal and on its own website.

7.2 ESCAT will consider evidence-based actions to address gender pay differences including ensuring transparency to promotion, pay and reward processes, clearly communicating the salary range on offer.

7.3 ESCAT will consider guidance from The Government Equalities Office to help understand gender pay gap figures and take the right action.

8.0 Pay review

8.1 Academy Trusts in England (and similar jurisdictions) are responsible for determining the pay of the Chief Executive Officers they are not legally bound to implement national pay awards. However, the DfE expects ESCAT to have robust governance and oversight in place, and certain expectations apply.

8.2 National pay awards

When a national pay award is announced (eg., 5% increase for support staff), ESCAT will apply a similar uplift to CEO and senior leaders, raising the upper and lower limits accordingly based upon support staff rates.

8.3 Pay related to performance²

When reviewing pay for Executive Leaders, Directors will ensure any increase is proportionate, justified, and aligned with the Trusts strategic aims including:

- Catholic life and mission
- Academic performance and pupil outcomes across ESCAT to ensure that the highest standard of education is being provided to pupils

² See Appendix 2 for Ready Reckoner

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- Contribution of schools to the wider society
- How responsible schools and students are across the Trust for the stewardship of creation
- Financial security of the Trust and schools

- 8.4 Directors will robustly challenge escalating leadership costs where they are not clearly justifiable, or where questions are raised about financial sustainability.
- 8.5 ESCAT will also consider the level of progress that is being made towards securing the Bishop's vision for an expanded Trust and the developments of systems within ESCAT to ensure sustainability.
- 8.6 ESCAT will also consider the following evidence when reviewing executive pay:
- Key Stage headline measures and how these compare to similar schools recognising context and situation
 - CSI ratings Ofsted ratings and progress made towards securing progress
 - Long- and short-term educational targets of ESCAT
 - Other national benchmarks
- 8.7 ESCAT will seek to establish how performance compares with the national average and with schools in trusts in the same area or which have a similar context
- 8.8 **Financial performance**
Financial performance alongside benchmarking with relevant sectors and the requirements of the 'Academy trust handbook' will be considered when reviewing executive pay.
- 8.9 Directors will have sufficient access to the current actual financial position and projections for ESCAT to inform decisions about pay.
- 8.10 When considering pay and ESCAT's financial performance, the following will be considered:
- ESCAT's deficit or surplus position
 - The auditor's view of ESCAT and the progress towards implementing audit recommendations
 - Requirement for additional financial support
 - Whether ESCAT has delivered to its financial forecast under the individual's management
 - Whether ESCAT is forecasting a deficit in the forthcoming three-year period, in excess of the operating surpluses generated in the previous three years
 - Whether ESCAT's pupil number projections have been reflected in the annual census

9.0 Review of pay progression and appeals

- 9.1 Pay ranges will only be reviewed when there have been significant changes to responsibilities and not just because the top of the current range has been reached.
- 9.2 Pay increases will always be considered in the context of the wider organisation and ESCAT will ensure that awards for exceptional performance are applied across all levels and not just to Executive Leaders.
- 9.3 Decisions to award pay progression will be related to the individual's performance. Pay increases will not be awarded automatically; they will be linked to a clear and measurable set of key performance indicators within the parameters of the agreed contractual arrangements.
- 9.4 Executive pay will not increase at a faster rate than that of teaching staff.
- 9.5 Before awarding pay progression, the remuneration committee will ensure that it is satisfied there is an evident link between the levels of achievement of the individual and across ESCAT. Progress has to be evident, but it is accepted it might not be even across all objectives.

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10.0 Appeals

- 10.1 If an Executive Leader is dissatisfied with any pay decisions, they will be expected to raise this with the Chair of the Board.
- 10.2 If the issue remains unresolved, the Executive Leader will be permitted to submit an appeal within 10 days of the notification of the pay decision or discussion with the Chair of the Board.
- 10.3 Appeals will be considered if they are based on any of the following:
 - Incorrect application to any provisions of their employment contract
 - Failure to have regard to statutory guidance relating to pay
 - Failure to take account of relevant evidence
 - Failure to consistently apply this policy and associated performance management or appraisal procedures
 - An allegation of bias
 - Unlawful discrimination of the Executive Leader
- 10.4 Executive Leaders will be within their rights to raise a formal complaint about a decision and raise a grievance under ESCAT's formal grievance procedure.

11.0 Monitoring and review

- 11.1 This policy will be reviewed by the Pay Committee and Directors as required and at least annually.

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Appendix 1

Additional Considerations

A1.0 Tax

- A1.1 ESCAT will ensure its senior employees' payroll arrangements fully meet their tax obligations and comply with HM Treasury's [guidance](#) about the employment arrangements of individuals on the avoidance of tax.
- A1.2 Senior managers with significant financial responsibilities will be exclusively on payroll and subject to Pay As You Earn with income tax and NI contributions deducted at source. In circumstances where it may be appropriate to make an off-payroll appointment, ESCAT board will ensure that tax arrangements remain transparent.
- A1.3 ESFA approval will be sought in advance in exceptional circumstances where ESCAT seeks to appoint an off-payroll accounting officer or CFO.

A2.0 Pensions

- A2.1 ESCAT will consider whether Executive Leaders are on the correct pension package that represents the best value for money for ESCAT and is fair for the Executive Leader.

A3.0 Characteristics

- A3.1 ESCAT's characteristics will be considered when setting executive pay, this will include considering:
- The number of schools in the Trust
 - The number of pupils
 - The range of provision
 - The quality of provision and their financial effectiveness
 - The type of school
- A3.2 ESCAT will seek to establish:
- Whether the size and provision of ESCAT provides any additional challenges
 - How similarly sized trusts remunerate their Executive Leaders
 - Whether the type of school presents additional challenges to that of an Academy Trust of a similar size

A4.0 Location

- A4.1 ESCAT will consider the location of its academies when making decisions about pay. Issues such as the cost of housing and whether the location results in additional financial burden will be considered.

A5.0 Ratios

- A5.1 Directors will consider statistics alongside the individual circumstances of ESCAT to form the basis of discussion around whether costs are reasonable and relevant in the context of ESCAT.

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A5.2 The following will be considered:

- Cost of salary per pupil when benchmarked against comparable Trusts
- Cost of total leadership team compared with Trusts of a similar size
- Percentage difference between the highest and lowest paid staff
- Rate of pay increase across ESCAT
- SLT cost as a percentage of total staff cost

A6.0 Succession planning

A6.1 When planning for successors, individuals will not automatically be recruited at the same level as their predecessor. ESCAT will consider:

- Whether severance payments are reasonable and justifiable
- The intended length of service
- The required notice period
- The length of time required to recruit a replacement

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Appendix 2

Performance review ready reckoner

Reviewee	Performance Reviewer	Performance Review/Objective setting	Process
CEO	Chair of the Board Vice Chair of the Board External Review moderation and support	August Mid term review February/March	<ul style="list-style-type: none"> • Directors appoint external reviewer and agree with CEO • Pay Committee and external moderator receive self-review and evidence paperwork at least one week prior to the review. • Pay Committee meet with external moderator prior to the review to ensure impartial assessment of the self-review and evidence • Chair of pay review feeds back to CEO • Review leads to assessment of salary and meeting with the Pay Committee for ratification • Targets agreed and with Pay Committee and Board • Mid term review by Chair of Pay Committee, targets reviewed and any changes made • Pay review Chair confirms with Trust that review has taken place
CFO/CFO	CEO Director from Pay Review	August Mid term review February/March	<ul style="list-style-type: none"> • CEO and Director receives self-review and evidence paperwork at least one week prior to review • In review meeting with CFO/CEO, CEO and Director discuss performance and evidence and agree to what extent objectives have been met • Recommendations on salary made to the Pay Committee and signed off by them • Targets agreed and signed off by CEO; shared with the Board