EVERYONE MATTERS SCHOOLS TRUST

Everyone Matters Schools Trust Executive Pay Policy 2026.2027

EXECUTIVE PAY POLICY

1. Purpose

This policy sets out the framework by which the Trust Board determines executive pay, ensuring that decisions are:

- Transparent, proportionate and defensible
- Based on a robust evidence-based process
- Aligned with the Trust's charitable purpose
- Delivering value for money

This policy complies with:

- Academy Trust Handbook (2025)
- DfE "Setting Executive Salaries" guidance (Nov 2025)
- CST Executive Pay Guidance

The Board recognises that executive pay decisions are subject to scrutiny and must be capable of external challenge.

1.2 Trust approach to Executive Pay

The Trust has adopted structured approaches, including internal pay ratios and uplift models where appropriate, to support consistent and evidence-based decision making.

While sector guidance does not prescribe specific formulas, these approaches provide a transparent and proportionate method for applying the principles set out in the Academy Trust Handbook and CST guidance.

1.3 Executive Pay Restraint

The Trust Board will ensure that decisions relating to executive pay are consistent with the principle that executive salaries and benefits should not increase at a rate which exceeds that of the wider workforce, including teaching staff, either in individual years or over the longer term.

In line with Department for Education guidance, this principle reflects the requirement that executive pay must be proportionate, represent value for money, and be capable of being justified in the context of public sector pay restraint.

1.4 Permitted Exceptions

The Board recognises that there may be limited circumstances where an increase in executive pay exceeds that of teaching staff. In such cases, the Board will only approve an exception where there is a clear, evidence-based justification, and where the decision remains transparent, proportionate and defensible. Any exceptional pay decision must be explicitly minuted as "exceptional" and include a clear statement of why standard policy ranges were not applicable.

Such circumstances may include:

a. Material Change in Role or Responsibilities

Where there has been a significant and evidenced increase in the scale, scope or complexity of the role, including:

- Growth in number of schools or pupils
- Expansion into new phases (e.g. secondary, SEND, alternative provision)
- Increased geographic or organisational complexity

b. Trust Growth or Structural Change

Where the Trust has undergone significant structural change (e.g. merger, rapid expansion, system leadership role), resulting in:

- Increased accountability
- Substantially increased operational complexity

c. Recruitment and Retention Considerations

Where there is clear evidence that pay adjustment is necessary to:

- Recruit to a critical executive role
- Retain a high-performing leader in a competitive market

This must be supported by:

- External benchmarking
- Evidence of market pressure

d. Exceptional Performance

Where performance has been demonstrably strong and significantly above expectations across:

- Educational outcomes
- Financial performance
- Strategic delivery

Any such award must:

- Be proportionate
- Not create unsustainable long-term pay inflation

e. Correction of Historical Positioning

Where pay is materially below appropriate market or internal levels and requires adjustment to:

- Maintain internal pay coherence
- Align with benchmarking evidence

f. Controls on Exceptions

In all cases where executive pay increases exceed those of teaching staff, the Board will:

- Record a clear and documented rationale
- Ensure the decision is supported by robust evidence, including benchmarking and affordability
- Confirm that the decision represents value for money
- Be satisfied that it would withstand external scrutiny, including by the DfE or ESFA

The Board will pay particular regard to the cumulative effect of pay decisions over time, ensuring that executive remuneration remains aligned with the wider workforce and does not give rise to disproportionate pay differentials.

1.5 Scope

This policy applies to:

- Chief Executive Officer (CEO)
- Chief Financial & Operations Officer (CFO/COO)
- Other executive leadership roles as determined by the Board

1.6. Principles

The Trust will ensure that executive pay:

- Reflects role, responsibilities, and organisational complexity
- Is supported by benchmarking and internal comparison
- Demonstrates clear value for money
- Is affordable and sustainable
- Maintains appropriate differentials across roles
- Executive pay increases will not normally exceed increases awarded to teaching staff over time unless clearly justified.
- Where total remuneration exceeds £160,000 dependent on Trust size the Board will consider whether additional external benchmarking or validation is required. *(See Appendix 7)*

2. Governance

2.1 Trust Board

- Holds ultimate responsibility for executive pay decisions
- Approves all decisions formally
- Ensures decisions are documented and defensible

2.2 Pay Committee

- Conducts detailed review and recommends pay decisions
- Composed of at least **3 independent trustees**
- No executive may participate in decisions about their own pay

The Board retains final approval of all executive pay decisions.

3. Executive Pay Determination Process

The Trust will apply a structured annual process:

1. Role evaluation (scope, scale, complexity)
2. Performance assessment
3. Benchmarking (minimum 3–5 comparators)
4. Affordability assessment
5. Application of internal pay relativity principles
6. Formal recommendation and Board approval

All decisions must be fully documented with supporting rationale.

4. Chief Executive Officer (CEO) Pay:

In accordance with the Academy Trust Handbook, the Chief Executive Officer is the Trust's Accounting Officer.

The Accounting Officer has a personal responsibility to Parliament, the Department for Education and the public for the proper stewardship of the Trust's financial resources.

This includes ensuring:

- Regularity (that funds are used in accordance with the funding agreement and legislation)
- Propriety (that expenditure meets high standards of conduct and governance)
- Value for money (economy, efficiency and effectiveness)
- Financial sustainability and risk management

The Accounting Officer must also:

- Advise the Board where proposed actions may not comply with these principles
- Ensure the Board has sufficient information to fulfil its responsibilities
- The Board recognises that these duties represent a significant level of personal accountability and regulatory responsibility, which is a key factor in determining CEO remuneration.

The Board will explicitly consider the responsibilities of the Accounting Officer role when determining CEO remuneration and will ensure that the level of pay can be justified in this context if subject to scrutiny by the DfE or other external bodies.

Internal Pay Relativity

The Board will explicitly review:

- CEO vs Headteacher pay
- CEO vs CFO/COO pay
- Executive vs wider workforce pay

This ensures:

- Fairness
- Structural coherence

- Defensibility

4.1 CEO (single role)

CEO pay will normally fall within a defined multiple of the highest-paid Headteacher within the Trust.

Where this approach is used:

- Typical range: **1.2 – 1.5 multiplier**
- Higher levels require justification through complexity and additional external benchmarking
- The CEO role will have a fixed pay range and scale to support progression.

4.2 CEO with Dual Role (CEO + Headteacher)

Where the CEO also holds a substantive Headteacher role:

- The Trust will apply an uplift model, not a full multiplier.

Approach:

- Base = substantive Headteacher salary
- Apply CEO uplift:

15% – 30% (normal range)

Exceptional cases:

Above 30% requires:

- Strong benchmarking
- Clear evidence of scale and complexity
- Explicit Board approval

6.3 STPCD Relationship

- The Headteacher salary will comply with STPCD where applicable
- The CEO uplift reflects **separate executive responsibilities**

The Trust will ensure full compliance with STPCD for the Headteacher role. CEO remuneration reflects additional responsibilities outside STPCD.

The Board recognises that executive leadership roles in academy trusts may sit outside STPCD, provided that decisions remain transparent, proportionate and defensible

7. Chief Financial & Operations Officer (CFOO)

7.1 Role Positioning

The Board recognises the CFOO as:

The second most senior executive role within the Trust

This reflects:

- Statutory financial responsibilities
- Oversight of public funds

- Trust-wide operational leadership
- Responsibility for compliance with DfE requirements

7.2 Pay Positioning

CFOO pay will:

- Sit below CEO remuneration
- Reflect second-tier executive responsibility

Typically:

60% – 80% of CEO salary

OR

Positioned around or slightly above the highest Headteacher salary (depending on structure)

7.3 Justification

The Trust has considered published sector benchmarking data, including Kreston academies benchmarking, CST executive salary surveys, and national salary datasets.

These indicate that CEO and CFO/COO salaries vary by size and complexity, but typically fall within the ranges outlined in appendix 7

The Trust's approach to pay, including internal ratios and uplift models, ensures alignment with sector practice while providing a structured and evidence-based framework for decision making.

Remuneration reflects:

- Accountability for financial governance
- Scale of organisational responsibility
- External market pressures
- Contribution to Trust performance and sustainability

8. Benchmarking

All executive pay decisions must include:

- Minimum 3–5 comparator organisations
- Matching on:
    - Pupil numbers
    - budget size
    - complexity

9. Documentation and Transparency

The Trust will:

- Maintain a full audit trail of evidence
- Record rationale clearly in Board minutes
- Publish required salary disclosures (>£100k bands)

- Be able to provide all supporting documentation for executive pay decisions to the DfE or ESFA upon request.

10. Defensibility Test (Mandatory)

Before approval, the Board must confirm:

- Pay is justified relative to role and responsibility
- Benchmarking has been applied appropriately
- A lower salary would risk recruitment or retention
- The decision would withstand public and regulatory scrutiny

11. Appeals

An appeals panel of independent trustees will consider any appeal.

11.1 Right of Appeal

An executive may appeal where:

- Policy has not been followed
- Relevant evidence was not considered
- Decision is unreasonable
- Procedural irregularity occurred

14.2 Appeals Process

- Appeals must be submitted within **10 working days**
- Appeals must state grounds and evidence

14.3 Appeals Panel

- Minimum of **3 independent trustees**
- No prior involvement in original decision

14.4 Scope of Appeal

The panel will assess whether:

- Process was robust
- Decision was evidence-based
- Outcome is defensible

11.5 Outcomes

The panel may:

- Uphold the decision
- Amend the decision
- Refer back for reconsideration

11.6 Finality

The decision of the Appeals Panel is final.

12. Review

This policy will be reviewed annually.

APPENDIX 1: EXECUTIVE PAY DECISION FRAMEWORK

Evidence Pack (required)

Each decision must include:

- Role description
- Performance review
- Benchmarking data
- Pay history
- Affordability statement
- Justification summary

APPENDIX 2: CEO PAY MODEL

A. CEO Only Model

Factor	Approach
Benchmark	3–5 MATs
Pay position	1.2–1.5 HT multiple
Adjustment factors	complexity, growth

B. CEO Dual Role Model

Step	Calculation
Base	HT salary
Uplift	15%–30%
Exception	>30% requires justification

APPENDIX 3: CFOO PAY MODEL

A. Benchmark Position

Comparator	Position
CEO	Higher
CFO/COO	60–80% of CEO
Headteachers	Similar or slightly lower dependent on Headteacher pay rationale inn STPCD

B. Evaluation Factors

- Size of trust budget
- Operational complexity
- Risk exposure
- Regulatory accountability
- Market competition

APPENDIX 4: EXECUTIVE PAY SCORING MATRIX

1. Purpose of the Matrix

The Executive Pay Scoring Matrix provides a structured, evidence-based framework to:

- Assess executive roles consistently
- Support proportionate and defensible pay decisions
- Provide a clear audit trail for Board decisions
- Reduce reliance on subjective judgement

This ensures compliance with the requirement for "robust evidence-based decision making" and "defensible" pay outcomes

2. Overview of Scoring Structure

Each executive role is assessed across four domains:

Domain	Weight
1. Role Scope & Complexity	30%
2. Performance & Impact	30%
3. Market Benchmarking	20%
4. Affordability & Value for Money	20%

Each domain is scored on a 1–5 scale, with weighted outputs.

3. Scoring Scale (applies to all domains)

Score	Definition
1	Significantly below expected level
2	Below expected level
3	Broadly in line with expectations
4	Above expected level
5	Significantly above expected level

Trustees must record justification for each score

4. Domain 1: Role Scope & Complexity (30%)

This domain assesses the objective scale and challenge of the Trust and role.

4.1 Factors to consider

Trustees score each factor, then determine an overall domain score:

- Number of schools
- Total pupil numbers
- Budget size
- Range of phases (primary, secondary, SEND, AP)
- Geographic spread
- School improvement context (e.g. Ofsted categories)
- Growth trajectory (planned expansion)

4.2 Suggested scoring guidance

Score	Descriptor
1	Small, stable Trust (low complexity)
2	Small Trust with moderate challenge
3	Medium sized Trust, mixed complexity
4	Large Trust OR smaller Trust with high challenge
5	Large, complex Trust with multiple risk factors

4.3 Evidence required

- Trust dashboard (schools, pupils, budget)

- Ofsted profile
- Strategic plan

5. Domain 2: Performance & Impact (30%)

This domain evaluates what has been delivered, not just role size.

5.1 Key performance areas

- Educational outcomes (progress, attainment)
- School improvement trajectory
- Financial performance (in-year and forecast)
- Staff retention and leadership stability
- Delivery of strategic priorities
- External evaluations (Ofsted, audit, reviews)

5.2 Scoring guidance

Score	Descriptor
1	Significant underperformance
2	Mixed or inconsistent performance
3	Expected performance delivered
4	Strong performance across key areas
5	Exceptional performance and impact

5.3 Evidence required

- CEO/CFO appraisal outcomes
- Trust performance data
- Financial statements
- External reviews

6. Domain 3: Market Benchmarking (20%)

Ensures pay is aligned to the external labour market and sector norms.

6.1 Requirements

- Minimum 3–5 comparator trusts
- Similar in:
    - size
    - budget
    - structure
    - geography

6.2 Scoring guidance

Position vs market	Score
Well below median	2
Around median	3
Between median and upper quartile	4
Above upper quartile	5 (requires strong justification)

A score of 5 must trigger explicit Board justification

6.3 Evidence required

- Benchmark data table
- Comparator justification

7. Domain 4: Affordability & Value for Money (20%)

7.1 Factors

- Executive pay as % of total expenditure
- Financial health of the Trust
- Budget forecast position
- Impact on wider staff pay decisions
- Overall leadership cost structure

7.2 Scoring guidance

Score	Descriptor
1	Not affordable / high financial risk

2	Significant financial constraints
3	Affordable within current model
4	Strong affordability and efficiency
5	Exceptional value for money

7.3 Evidence required

- Budget forecasts
- management accounts
- workforce cost analysis

8. Calculating the Overall Score

Step 1: Assign scores (1–5) per domain

Step 2: Apply weighting

Step 3: Calculate weighted average

Example (CEO):

Domain	Score	Weight	Weighted
Complexity	4	30%	1.2
Performance	4	30%	1.2
Benchmarking	3	20%	0.6
Affordability	3	20%	0.6
Total			3.6

9. Interpreting the Score

Score Range	Pay Position
4.5 – 5.0	Upper quartile justified
3.5 – 4.4	Upper-mid range
2.5 – 3.4	Mid-range
1.5 – 2.4	Lower range / caution

<1.5	Review required

10. Applying the Score to Pay Decisions

The matrix does not set salary directly but informs:

- Position within pay range
- Size of uplift (for dual-role CEO)
- Whether movement is justified

Example: CEO dual-role application

Score	Outcome
3.0	15–20% uplift
3.5	20–25% uplift
4.0+	25–30% uplift
>4.5	Consider >30% (exceptional justification required)

Example: CFO/COO application

Score	Outcome
3.0	Lower end of range (≈60% CEO)
3.5	Mid-range (≈70% CEO)
4.0+	Upper range (≈75–80% CEO)

11. Mandatory Defensibility Checks

After scoring, the Board must confirm:

- The score aligns with evidence
- The resulting pay level is proportionate
- Internal pay relationships are coherent
- Decision would withstand external scrutiny

12. Documentation Requirements

Each scoring exercise must include:

- Completed matrix
- Evidence references
- Written narrative summary
- Final Board decision and rationale

APPENDIX 5: PAY DECISION MATRIX

EXECUTIVE PAY DECISION – TRUSTEE SCORING FORM

Executive Role: ____________________________
Name: ____________________________________
Date: _____________________________________
Review Type: ☐ Annual ☐ Appointment ☐ Adjustment

1. SCORING MATRIX

Score each domain 1–5 and provide brief evidence.

A. Role Scope & Complexity (30%)

Score: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

Key considerations:

- Trust size (schools/pupils/budget)
- Complexity (phases, SEND/AP, geography)
- School improvement context
- Growth trajectory

Evidence / comments:

B. Performance & Impact (30%)

Score: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

Key considerations:

- Educational outcomes
- Financial performance
- Strategic delivery
- Leadership stability

Evidence / comments:

C. Market Benchmarking (20%)

Score: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

Key considerations:

- Position vs comparator trusts (3–5)
- Median / upper quartile comparison

Evidence / comments:

D. Affordability & Value for Money (20%)

Score: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

Key considerations:

- Affordability within budget
- Pay vs total expenditure
- Workforce impact

Evidence / comments:

2. OVERALL SCORE

Domain	Score	Weight	Weighted
Complexity		30%	
Performance		30%	
Benchmarking		20%	
Affordability		20%	
TOTAL			

3. PAY POSITION GUIDANCE

Tick applicable outcome:

☐ Lower range (score <2.5)
☐ Mid-range (2.5–3.4)
☐ Upper-mid range (3.5–4.4)
☐ Upper range (4.5+)

4. APPLICATION TO PAY DECISION

A. CEO (tick one)

☐ CEO only → apply ratio (typically 1.2–1.5 of highest-paid HT)

☐ Dual role CEO → apply uplift:

☐ 15–20%
☐ 20–25%
☐ 25–30%
☐ >30% (exceptional – justification required)

B. CFOO (tick one)

☐ Lower range (~60% CEO)
☐ Mid-range (~70% CEO)
☐ Upper range (~75–80% CEO)

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5. PROPOSED PAY

Current salary: £____________________

Proposed salary: £___________________

% change: __________________________

6. DEFENSIBILITY CHECK (MANDATORY)

Confirm all apply:

☐ **Decision supported by evidence**
☐ **Benchmarking used appropriately**
☐ **Affordable and represents value for money**
☐ **Internal pay relationships are appropriate**
☐ **Decision would withstand DfE/public scrutiny**

7. FINAL JUSTIFICATION (REQUIRED)

Provide a clear summary explaining the decision:

8. APPROVAL

Pay Committee Chair: ___________________________

Trust Board Approval: ____________________

Date: __________________________________

APPENDIX 6: INTERNAL PAY RELATIVITY CHECK

The Board will confirm:

- CEO vs Headteacher ratio is proportionate
- CFOO sits appropriately below CEO

- Whole leadership structure is coherent

APPENDIX 7: EXECUTIVE PAY BENCHMARKING TABLE (SECTOR EVIDENCE)

1. Chief Executive Officer (CEO) Benchmarking

Trust Size	Typical Salary Range	Median / Average	Upper Quartile / Outliers	Evidence Source
Small MAT (<3,000 pupils)	£110,000 – £160,000	~£140k–£150k	£170k+	Derived from sector average £156,491 across MAT leaders [fusionbusi...ess.org.uk] CST salary survey
Medium MAT (3,000–7,500 pupils)	£140,000 – £190,000	£152,143	£200k+	Kreston benchmarking data for medium MATs [learningat.uk] CST salary survey
Large MAT (7,500+ pupils)	£180,000 – £260,000+	£204,548	£250k–£300k+	Kreston benchmarking data and TES analysis [learningat.uk] CST salary survey
Very large / national MATs	£250,000 – £350,000+	Variable	£300k–£500k+	TES and sector "rich list" analysis showing highest paid CEOs [learningat.uk], [fusionbusi...ess.org.uk] CST salary survey

Pay Comparison to Other Local Multi Academy Trusts (2023–25)

Trust	Academies	Pupils	CEO Salary	Role/HTs/ Central Team
Mersey View Learning Trust (Sefton)	6	3,269	£160-170k	Executive Principal + Head of School + 5 HTs
Lydiate Learning Trust (Sefton & Liverpool)	4	2,944	£150-160k	CEO + central team + 4 HTs

Three Saints Academy Trust (St Helens)	5	1,349	£120–130k	CEO + 5 HTs
EMST (St Helens & West Lancashire)	4	2,969	£130–140k	CEO/Principal dual role + 3 HTs
Mosaic Learning Trust (Wigan)	3	2,584	£130–140k	CEO + Director of Education + 3 HTs
Rainhill High School (St Helens)	1	1,800	£130–140k (x2)	Principal/CEO + 1 other

2. Chief Financial & Operations Officer (CFO/COO) Benchmarking

Trust Size	Typical Salary Range	Median / Typical	Upper Quartile	Evidence Source
Small MAT	£80,000 – £110,000	£95k–£105k	£115k+	UK CFO salary distributions and sector surveys [cstuk.org.uk]
Medium MAT	£95,000 – £130,000	£110k–£120k	£135k+	CFO median salary ~£101k and upper ranges to ~£170k [cstuk.org.uk]
Large MAT	£120,000 – £170,000	£130k–£150k	£160k–£180k+	CFO and Finance Director market benchmarks (large organisations) [brownejacobson.com]

3. CEO to CFO/COO Pay Relationship (Derived Sector Positioning)

Role Relationship	Typical % Differential	Example (CEO £170k)	Evidence Source
CFO/COO – lower range	~60% of CEO	£102k	Derived from CFO median (£101k) vs CEO averages (£150k–£200k) [cstuk.org.uk], [learningat.uk]
CFO/COO – typical range	~70% of CEO	£119k	Observed alignment between CFO median and mid-range MAT CEO salaries [cstuk.org.uk], [learningat.uk]
CFO/COO – upper range	~75–80% of CEO	£128k–£136k	Upper quartile CFO and Finance Director salaries in larger organisations [brownejacobson.com]

4. Key Observations for Trust Board

Observation	Evidence
CEO salaries increase significantly with trust size and complexity	Larger MAT CEOs average over £200k [learningat.uk]

CFO/COO salaries reflect wider finance director market norms	UK finance director salary ranges £90k–£180k+ [brownejacobson.com]
CFO salaries are typically below CEO but above most other roles	CFO median ~£101k vs CEO averages £150k+ [cstuk.org.uk], [learningat.uk]
Pay variation across trusts is significant, requiring structured justification	Sector analysis shows wide CEO pay distribution and outliers [learningat.uk], [fusionbusi...ess.org.uk]

The above data demonstrates that:

- Executive pay varies significantly across the sector
- There is no fixed national pay scale, requiring local judgement [jamescowpe...ston.co.uk]

However, clear patterns exist:

  - CEO pay scales with size and complexity
  - CFO/COO roles align with finance director labour market
  - A consistent pay hierarchy exists across trusts