KEYS Academy Trust

"Unlocking the Future"

Executive Pay Policy

Policy Level and Description:	1	TKAT Statutory Policy NO CHANGES TO THE CORE TEXT ALL Schools require a policy on this topic/area. Only changes to highlighted sections are allowed to the core text – changes will be limited to school name and very limited school-specific details - LGBs to adopt, implement and monitor this policy.
Reviewed by: ***(Trust Officer)***	Hester Wooller CEO	
Approved by: ***(Trust Committee/Trust Board)***	FAPPP	
Trust approval date: ***(dd/mm/yyyy)***	18/11/2025	
Review due: **(*mm/yyyy)***	11/2027	

Version	DATE	DESCRIPTION
1	November 2025	New Policy based on the Academy Trust Handbook

We are a family of distinctive schools at the heart of the diverse communities we serve. In line with our Christian ethos, we aspire to excellent learning and pastoral care for pupils and staff and are committed to being open and welcoming to all.

Contents

Policy Overview **3**

Overarching Principles 3

Roles and Responsibilities 3

Role of The Remuneration Committee 4

Policy in Detail **5**

1. Setting Executive Pay 5

1.1 Remuneration for Executives on Recruitment 5

Chief Executive Officer 5

Executive Director Pay 5

1.2 Benchmarking 5

1.3 Internal Relativities 6

1.4 Bonuses and other Discretionary Payments 6

2. Appraisal of Executives 6

Policy Review **8**

Appendix 1 – The (Seven) Nolan Principles of Public Life **7**

Policy Overview

Overarching Principles

Within The Keys Academy Trust (TKAT) our goal is to develop high performing schools where our focus is on unlocking future academic and pastoral excellence for all through collaboration

TKAT reward for executives is designed to enable the Trust to attract and retain the very best leaders who are able to translate the vision and purpose of TKAT into success in every school.

Pay levels for executive roles will be set through a fair and transparent reward structure, underpinned by an evidence-based process and supported by a comprehensive performance management scheme. They will be reflective of the individual's role and responsibilities to ensure delivery against the Trust's challenging targets and long-term strategy.

This Pay Policy addresses: setting executive pay; performance appraisal (not linked to pay); additional remuneration and the publication of information regarding executive pay.

No individual will be involved in decisions regarding their own remuneration.

Roles and Responsibilities

Setting the framework for the pay of the Chief Executive Officer (CEO) and the executive directors in an academy trust is the responsibility of the board of trustees. The trustees recognise that they are governing a publicly funded organisation and it is their responsibility to ensure that the pay and leadership structure is in keeping with the Nolan principles of public life (Appendix 1); affordable and sustainable in the long term and appropriate for the level of responsibility. The trustees will ensure that:

- The procedure for determining executive pay is agreed by the board and documented
- Decisions about executive pay reflect independent scrutiny by the board and that conflicts of interest are avoided
- Pay decisions are made using objective criteria so there is no discriminatory effect
- Factors influencing pay decisions are clear, based on role responsibilities, benchmarking, proportionality, and affordability. Performance considerations will not influence pay decisions.
- Pay is defensible relative to the public sector market and aligned internally
- The rationale behind decisions on remuneration are documented.

For this purpose, the Trust Board has delegated responsibility for proposing executive pay to a Remuneration Committee (the Committee) made up of trustees only. The Committee may ask the CEO and/or any other executive to attend meetings of the Committee by invitation, to provide information provided that any such executive shall not be permitted to attend any part of a meeting where their remuneration, benefits and/or incentives are discussed. The Committee may involve consultants to provide information to support any proposal.

Role of The Remuneration Committee

The role of the Committee is to ensure that arrangements regarding reward support the strategic aims and ethos of the Trust and enable the recruitment, motivation and retention of senior executives. At the same time, arrangements need to comply with the requirements of regulatory and governance bodies, to satisfy the expectations of the Department for Education (DfE) and to remain consistent with the expectations of the wider employee population.

The Committee is guided by the following principles:

1. **Transparency**

The Committee meets at least annually and reports to the Trust Board, explaining how proposed remuneration levels have been set, how executive salaries have been benchmarked against the education sector and against external guides to fair pay. Senior staff should expect that salaries will be published. In addition, it is incumbent upon the Trust Board, when managing public money, not to enact 'transactions which set precedents, are novel, contentious or could cause repercussions elsewhere in the public sector'. This limits options for adding elements to the package.

2. **Proportionality**

The Committee will refer to three comparators to assess the proportionality of salary levels across the Trust: comparison within the Trust; comparison within the education sector (in particular, other multi academy trusts); and other comparable sectors.
The Committee will review salary levels to ensure adherence to TKAT's core values and ethos, and that the relative equity between the highest paid executive and the lowest paid teaching staff within TKAT will be monitored and will act a guide to salaries.

3. **Performance**

It will be for the Committee to review how executive directors have performed against targets key component of any pay decision. Executive directors' remuneration will be based on role responsibilities, benchmarking, and proportionality. Performance will be reviewed for accountability and development purposes only, and will not directly influence pay decisions.

Responsibilities specific to the Remuneration Committee include:

- to consider, determine and keep under review a framework, or policy, for the remuneration, benefits and incentives of the CEO and other members of the Executive Team as the Trust Board shall from time to time direct
- in determining that framework, to seek evidence of the remuneration, benefits and incentives paid to senior executives in comparable employment within the education, commercial and voluntary sectors
- to consider the outcome of every appraisal of the performance of the CEO and other executive directors
- to make recommendations to the Trust Board as to the remuneration, benefits and incentives that should be paid to the CEO based on role responsibilities, benchmarking, and proportionality, ensuring decisions are fair, responsible, and compliant with ATH guidance.
- to make recommendations to the Trust Board as to the remuneration, benefits and incentives of newly appointed executive directors

Policy in Detail

1. SETTING EXECUTIVE PAY

1.1 Remuneration for Executives on Recruitment

The Trust Board has a duty to remunerate executive leaders in TKAT appropriately, whilst mindful that primary education is a public service using public money. Pay levels will be determined with consideration to:

- recruitment and retention challenges;
- benchmarking with similar positions in other multi academy trusts and comparable sectors;
- the benchmark within specific professions outside the education sector (i.e. Finance, IT, HR);
- the size, complexity and levels of challenge across the Trust;
- the extent of technical expertise or breadth of subject knowledge required to fulfil the remit;
- the breadth / scope of areas of responsibility;
- the level of assigned risk;
- the sphere of influence and personal impact on the performance of Trust;
- internal relativities and affordability across the whole team;
- sustainability and progression, and
- consideration to any guidance from the DfE.

All executive directors will have clear and agreed job descriptions.

Chief Executive Officer

CEO pay will be set by the Trust Board following recommendation by the Committee established for the purpose of reviewing executive level pay only. The CEO's salary is subject to a cap. Remuneration comprises pay, plus pension and annual leave. No other benefits are provided.

Executive Director Pay

Pay for the executive directors will be proposed by the CEO and set by the Trust Board following recommendation by the Remuneration Committee. Executive directors' pay is subject to a cap. Remuneration comprises pay, plus pension and annual leave. No other benefits are provided.

1.2 Benchmarking

Benchmarking will provide one source of information for decisions about pay. As a specialised sector, there is little available across multi academy trusts for comparison. Where a similar trust does exist, however, comparisons will be made. TKAT recognises the limitations of focusing only on this sector and commits to look further afield to provide a more informed analysis and greater confidence in benchmarking data. Multi academy trusts are a reference point, but not exclusively. The remuneration of executives in other public sector and comparable organisations will be reviewed to support the determination of executive salaries.

Whilst the Trust may be keen to entice executives from the commercial sector, similar pay rates may not be appropriate for leadership roles in education. All public sector executives are subject to the Nolan principles of public life and these form part of the accountability mechanisms and procedures for setting executive pay in education.

1.3 Internal Relativities

In setting executive pay, there is a balance to strike with what is 'fair' in comparison to other roles in the organisation. Pay ratios in TKAT will be used to consider the differential in pay between the CEO, executive directors and teaching staff - and to monitor wage dispersion. Specific reference is made to newly qualified teachers. The Trust Board has determined that:

- The CEO's salary will not exceed 10 X the salary of the lowest paid, qualified teacher on M1 pay scale (England and Wales).
- Executive salaries will not exceed 8 X the salary of the lowest paid, qualified teacher on M1 pay scale (England and Wales).
- The pay scale used as a reference is the national pay scale, as determined by the School Teachers' Review Body (STRB) and excludes any salary supplement applied to London and the Fringe.

Proportionality will be a feature of decisions regarding executive pay. Any increases will take into consideration the percentage increases across the teaching profession.

1.4 Bonuses and other Discretionary Payments

TKAT does not operate a bonus scheme for executives as standard. Additional remuneration, such as bonuses or relocation, will be applied only in exceptional circumstances and determined by the Trust Board upon recommendation by the Remuneration Committee. Any bonuses paid across the organisation are one-time and discretionary. They are not contractual and do not represent an increase in pay nor a contribution to pension.

TKAT does not engage in golden handshakes to welcome, or entice, executives to join TKAT.

The Trust Board reserves the right to negotiate a compensatory payment for termination of employment by mutual consent. Such a payment will only be made if the Trust Board is satisfied that it is in the best interests of TKAT and in the public interest. Any such decision will be documented by the Trust Board.

There is no provision for enhanced redundancy payments.

2. APPRAISAL OF EXECUTIVES

The Chair of the Trust Board will undertake the performance review of the CEO and the CEO will undertake the performance review of the executive directors. A review meeting will take place in December for the CEO and in March for other executives to evaluate the overall performance from the previous academic year and to agree targets/objectives for the next appraisal period.

Appraisal of performance will take into consideration:

1. Core competences and capabilities, as outlined in the Job Description

2. Performance against the strategic plan

3. Short term (annual) objectives / targets / KPIs
4. Sustained improved performance of the Trust to include progress against Ofsted/SIAMS inspections
5. Sustained improved performance against other key criteria where national statistics exist, e.g. key stage results.
6. Health, safety and wellbeing of staff and children are effectively supported.
7. Execution of statutory and regulatory compliance responsibilities
8. Financial sustainability and organisational efficiency
9. Effective risk management
10. Success in fostering and promoting the TKAT Narrative "One Trust, One Team, unlocking the future for all

It is the responsibility of the CEO and executive directors to provide information, evidence and data to support their review meeting.

The annual review meeting will take place the Autumn term for the CEO and in the Spring term for the other executives. Following the review, a report comprising an overall assessment of performance, also recommendations on pay and targets for the following academic year will be drafted by the Chair of the Trust Board for the CEO, and by the CEO for the executive directors. These will be considered by the Committee in November, in order to propose a pay award, if appropriate.

The executives will be informed of the outcome of pay recommendation in writing and given the right to appeal. Any appeal will be heard by a committee comprising three members of the Trust Board who are not on the Remuneration Committee, and an external advisor if one has not been used in previous meetings.

3. PUBLICATION

The Trust Board will publish all salaries of £100,000 and above on the TKAT website.

Policy Review

This policy will be reviewed by the TKAT Remuneration Committee every 2 years as per the TKAT policy cycle or sooner if required.

Appendix 1 – The (Seven) Nolan Principles of Public Life

Selflessness - Holders of public office should act solely in terms of the public interest.

Integrity - Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

Objectivity - Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

Accountability - Holders of public office are accountable for their decisions and actions and must submit themselves to whatever scrutiny necessary to ensure this.

Openness - Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for doing so.

Honesty - Holders of public office should be truthful.

Leadership - Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.