Charlton Park Academy Trust Executive Pay Policy

Introduction

This policy sets out Charlton Park Academy Trust framework for making any changes to executive pay from October 2025.

This policy does not form part of the terms and conditions of any employee's employment with the Charlton Park Academy Trust and is not intended to have contractual effect.

The Charlton Park Academy Trust is committed to ensuring that the pay of its senior executive leaders is proportionate, transparent, and aligned with public sector expectations of accountability and value for money. Executive pay will reflect the values, strategic priorities, and financial context of the Charlton Park Academy, ensuring alignment with its core purpose: delivering high-quality education and outcomes for pupils with SEND and outreach services for SEND in line with our stated charitable objectives.

This policy complies with the DfE's Academy Trust Handbook, from time to time in force, and whilst this policy sets out how the Charlton Park Academy Trust determines and manages future pay decisions for executive roles within the Charlton Park Academy Trust that hold executive responsibility, certain provisions of the Academy Trust Handbook apply to all Charlton Park Academy Trust staff, not only executives.

In addition, this policy complies with the following:

- Charity Commission guidance on trustee duties and pay
- Companies Act 2006 director responsibilities
- Department for Education (DfE) guidance.

This policy is underpinned by the seven principles of public life:

- Selflessness
- Integrity
- Objectivity
- Accountability
- Openness
- Honesty
- Leadership

The primary aims of this policy are to:

- Support the recruitment and retention of high-quality executive leaders;
- Enable the Charlton Park Academy Trust to recognise and reward executive leaders appropriately for their contribution.
- Ensure decisions made on executive pay are a reasonable and defensible reflection of an individual's contributions, their role and responsibilities.
- Ensure a consistent and evidence-based approach to setting and reviewing executive pay; and

- Maintain public trust in the stewardship of public funds.

Confidentiality

All information regarding the pay of individual employees, whether verbal or written, must be treated as strictly confidential and not communicated to anyone not directly involved in the process. Any breach of confidentiality may be treated as a disciplinary matter and dealt with in accordance with the Charlton Park Academy Trust’s Disciplinary Policy and Procedure.

Equal Opportunities

This policy will be applied fairly and consistently to all employees regardless of sex, gender reassignment, race (including colour, ethnic or national origin), religion or belief, age, marital status or civil partnership, disability, sexual orientation, pregnancy or maternity, part-time or fixed-term status.

Review and Monitoring

This policy will be reviewed annually and monitored for effectiveness in rewarding performance and ensuring compliance with equalities legislation.

Who This Policy Applies To

This policy applies to all roles within the Charlton Park Academy Trust that hold executive responsibility, specifically:

- Chief Executive Officer/Accounting Officer (CEO/AO);
- Chief Financial Officer (CFO);
- This policy does not apply to Senior Vice Principal or other members of the trust or school leadership team.

- **Governance and Decision-Making**

No individual can be involved in deciding their own Pay.

1. **The Board of Trustees** is responsible for ensuring that executive pay decisions are evidence-based, transparent, proportionate, and justifiable. It will apply independent scrutiny, avoid conflicts of interest, and clearly consider educational performance, financial outcomes, and role difficulty. Pay must offer value for money, align with public sector benchmarks, and should not grow faster than teachers' pay.

   The Board of Trustees is the approving body for all decisions on executive pay. It will ensure all salary decisions are documented in an agreed pay policy and minuted with supporting evidence. The Board of Trustees will also have oversight of the ratio between the highest and median earners in the Charlton Park Academy Trust, to inform value-for-money and fairness assessments. The Board of Trustees should also be aware of executives' wider business interests and maintain proper records and rationale.

The Charlton Park Academy Trust accepts that absolute independence in any review process may not always be possible. In circumstances where this may be the case, reasonable steps should be taken and documented accordingly, to protect the integrity of the process and ensure any challenges to its independence are limited and justifiable.

2. **The Accounting Officer** must be able to demonstrate to the DfE that executive pay reflects value for money and probity. All executive pay decisions must also be defensible in terms of the Charlton Park Academy Trust's public funding obligations and additional income generated through its' activities.

3. **The Pay Committee** a sub-committee of the Board of Trustees comprised entirely of non-executive trustees shall be responsible for reviewing and recommending executive pay. It shall ensure individuals do not decide their own pay; keep this Executive Pay Policy under review as delegated by the Board of Trustees and recommend and monitor executive pay, including senior leadership below executives. It will review executive performance to inform pay decisions and approve and oversee performance-related pay design and targets. Where necessary, the Pay Committee may seek independent benchmarking advice or legal guidance to support changes to executive pay to support their decision-making. The Pay Committee should commission external benchmarking every three years, or more frequently where market conditions change significantly. Final approval rests with the full Board of Trustees.

4. **The Pay Committee** will operate in line with the Academy Trust Handbook, robustly document decisions, and ensure they are available for audit. All potential conflicts must be declared and recorded, and no member may benefit financially from the outcome of any decision.

5. **Executive Leaders** may attend meetings when invited to advise on general pay matters but must withdraw from discussions about their own Pay. When making decisions, trustees should apply the 'public interest' test, asking whether the Pay would be viewed as fair, proportionate and justifiable by the DfE, Parliament, and the public. Decisions should reflect the Charlton Park Academy Trust 's role as a steward of public funds.

Pay Determination Principles

All pay decisions will be justifiable against public sector norms, represent an efficient use of the Charlton Park Academy Trust 's funds and be documented with a clear rationale.

Pay decisions will consider:

- Comparable trusts and organisations by range of services, generated income, size, region, and complexity.
- Sector data (e.g. DfE publications).
- Local pay practices for equivalent public sector roles.

- Contextual factors such as pupil numbers, Ofsted ratings, deprivation levels and financial performance.
- The ratio between the highest-paid and the median employee in the Charlton Park Academy Trust.
- The presumption that executive pay should not increase at a faster rate than nationally agreed teachers' pay rates, unless there is a clearly documented and justified rationale (e.g. increased scale or complexity of role, exceptional performance). If a decision was made to increase executive pay at a faster rate than nationally agreed teachers' pay, it must be explicitly reviewed and approved by the full Board of Trustees and recorded in governance documentation.

All future pay awards must be based solely on measurable future outcomes. They will not be backdated or cumulative without the express approval of the Board of Trustees. The Trust will not use performance-related pay to compensate for underfunding or recruitment challenges.

Components of Pay

Component	Policy Guidance
Base Salary & allowances	Fixed annually, increases only if objectively justified.
Performance Related Pay	Must be capped, transparent and outcomes-based, and linked to measurable objectives. Not guaranteed or cumulative.
Pension	As per Teachers' Pension or Local Government] Pension Scheme rules. No enhanced employer contributions without approval of the Board of Trustees.
Benefits	Minimal, justified and declared.
Secondments/Additional Roles	Externally paid roles must be declared. Income-generating roles must be approved by the Board of Trustees

Performance Related Pay

Individuals can expect to receive regular, constructive feedback on their performance and are subject to annual appraisal that recognises their strengths, informs plans for their future development, and helps to enhance their professional practice.

The Charlton Park Academy Trust does not currently operate a performance-related pay scheme for Executive Leaders. All Executive Pay Levels are fixed and reviewed based on outcomes.

Where the Executive Leader is absent due to long term sickness absence during the academic year or at the time of a salary review, decisions will be contingent upon individual circumstances and based on the employee's performance during relevant periods of attendance. Where the Executive Leader is absent due to pregnancy or maternity or adoption or shared parental leave, decisions will be no less favourable than if the employee had not been absent due to such reasons.

Charlton Park Academy does not operate a bonus scheme.

Pay Structure, scales and allowances

The Charlton Park Academy Trust uses a fixed structure for executive salaries, with roles placed onto existing salary spine points and salary allowances, according to responsibility, scale, areas of responsibility and accountability and performance. Additional duties, hours or overtime must be approved by the Chair of Trustees. Any or all future scale point changes, and additional pay or future pay allowance or increase would require approval of the full Board of Trustees and be minuted and recorded by the committee. Future pay awards by STRB or Joint negotiating body would be applied at only the existing rates, as applicable to the rest of the staff rates.

Exit Payments

Any settlement payments must comply with DfE and HM Treasury rules and will be recorded and auditable. Any payments being considered must be based on legal advice and affordability and disclosed in the audited financial statements in accordance with the Academies Accounts Direction; any non-statutory or non-contractual ("special severance") elements are disclosed individually.

Before making any binding new commitments to pay above statutory or contractual entitlements, the Board of Trustees must consider:

- Whether the proposed payment is in the Charlton Park Academy Trust 's interests;
- Legal advice on the likelihood of success if the case proceeded to employment tribunal (if the Charlton Park Academy Trust is likely to lose and defence costs would be high, a settlement may be justified; if likely to succeed, a settlement should not be offered);
- If a settlement is justified, the level of settlement, which must be less than what the relevant body (e.g. an employment tribunal) is likely to award.

Staff severance payments must not be made where they could be seen as a reward for failure (e.g. gross misconduct or poor performance). The only acceptable rationale in a gross misconduct case is where legal advice indicates the claimant is likely to succeed because of procedural errors; for poor performance, compare the time/cost of capability procedures.

Prior DfE approval is required before any offer is made where any of the following apply:

- the non-statutory/non-contractual (special severance) element is £50,000 or more (gross)
- the exit package including a special severance element is £100,000 or more (gross); or
- the employee earns over £150,000 (gross).

Settlements must not be accepted unless they satisfy the conditions in the Academy Trust Handbook, DfE's guidance and submission template, and comply with this policy. No ex-gratia payments will be approved without clear legal justification and oversight from the Board of Trustees.

Transparency and Disclosure

The Charlton Park Academy Trust will disclose the number of employees whose benefits exceeded over £100,000, in £10,000 bands, for the previous year ending 31 August, in its accounts and on its website.

Tax Arrangements for Senior Employees

The Charlton Park Academy Trust will ensure that payroll arrangements for Executive Leaders fully meet their tax obligations and comply with HM Treasury guidance on the employment arrangements of individuals to avoid tax. Senior managers with significant financial responsibilities will be paid exclusively via the Charlton Park Academy Trust 's payroll, with income tax and National Insurance contributions deducted at source under the Pay As You Earn (PAYE) system. The Charlton Park Academy Trust will not enter any arrangements which could be perceived as facilitating tax avoidance.

Risk and Assurance

To mitigate reputational risk:

- All future executive pay award and such decisions will be subject to review by Audit Committee and full committee decision making, following any recommendations by the Pay committee
- Proposals to make new salary awards above £150,000 require scrutiny from the full Board of Trustees

Review and Audit

This policy will be reviewed annually or following significant changes in guidance or structure. Internal and/or external audit may review implementation and compliance.

All new pay and salary decisions under this policy will be subject to scrutiny and recorded in full Board minutes.

Appendix A: Executive Pay Appeals Procedure

Where an Executive Leader wishes to appeal a decision related to their Pay, they must comply with this procedure.

This process does not apply to general dissatisfaction with policy or benchmarking approach, but only to the application of this policy to the individual case.

The reasons for seeking a review may include the person or committee who made the decision having:

- incorrectly applied any provision of this policy;
- failed to have regard for statutory guidance;
- failed to take proper account of relevant evidence;
- took account of irrelevant or inaccurate evidence;
- being biased; or
- unlawfully discriminated against the employee.

Appeal Process

1. **Written Appeal Submission:**

    - The individual must submit a formal written appeal to the Chair of Trustees within ten working days of being notified of the decision in writing.
    - The appeal must clearly state the grounds for appeal and, where applicable, include the evidence they consider should be considered.

2. **Appeal Hearing:**

    - The appeal hearing will be held without unreasonable delay.
    - The individual will have the opportunity to make representations in person and may be accompanied by a work colleague or trade union representative.

3. **Review Panel:**

    - A panel of three non-executive trustees, not previously involved in the original decision, will consider the evidence that is presented before making a decision.
    - They may request additional evidence or clarification from both the individual appealing and the Pay Committee.

4. **Outcome:**

    - A written outcome will be provided without unreasonable delay and will include reasons for the decision.
    - The panel's decision is final and will be reported to the full Board of Trustees.