

Senior Executive Accountability Regime (SEAR)

Practical issues



- Accountable Executive(s) for your project
- Core SEAR operational team (Legal, Compliance, HR, Co-Sec)



- 'Statements of Responsibility'
- 'Responsibility Map'
- 'Coverage' across regulated 'prescribed responsibilities': 'overlap' or 'underlap'?
- 'Shared' vs 'split' responsibilities (e.g. co-heads, dual reporting lines, multidisciplinary functions)



- Senior Executives' understanding of their own 'area of responsibility'
- 'Reasonable steps' policies and handover arrangements
- Documenting Senior Executives' decision making
- Delegation: to appropriate person and properly documented?



- Align SEAR and Fitness and Probity compliance frameworks
- Update disciplinary policy
- Consider constitutional/'fair procedures' implications
- Policies and procedures to support individuals' compliance with individual codes of conduct



Project ownership

Governance

Senior Executives' roles and responsibilities

Individual codes of conduct

Senior Executives: 'Take all reasonable steps to ensure regulatory compliance'

Employment documentation

HR policies and processes

Maintaining SEAR process



- Board, Sub-Committee and Executive Committee structure
- Board and Committee terms of reference
- Group/overseas governance and operational input
- Processes to support collective decision making (e.g. Senior Executives on committees)



- Staff training and refreshers
- 'Speak up' and ad hoc staff support to ensure compliance
- Monitoring compliance with SEAR and codes of conduct
- Tracking new joiners



- Update offer letters for new hires
- Amend template contracts of employment
- Contract addendums for existing staff
- Approach to settlement agreements with staff



- Process for updating SEAR compliance framework going forward
- Process for collating 'best practice' feedback