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|  |  Plan integriteta |  |
|  |  DOO „Vodovod i kanalizacija Kotor“  |  |
|  | REGISTAR RIZIKA | PROCJENE I MJERENJE RIZIKA | REAGOVANJE NA RIZIK | PREGLED I IZVJEŠTAVANJE O RIZICIMA |  |
|  | Oblasti rizika | Radna mjesta | Osnovni rizici | Postojeće mjere kontrole | Preostali rizici(rezidualni) | Vjer. | Posljedice | Procjena | Predložene mjere za smanjenje/otklanjanje rizika | Ogovorna osoba | Rok | St. | Kratak opis i ocjena realizacije mjere |  |
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| 1.1 | Rukovođenje i upravljanje |

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| izvršni direktor |
| sefovi sluzbi |
| rukovodilac sektora tehnike |
| rukovodioc sektora ekonomsko-pravnih poslova |
| članovi odbora direktora |

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| Donošenje nezakonitih odluka |

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| Zakoni i podzakonska akta |

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| Donosenje odluka pod eksternim uticajem, suprotno javnom interesu zbog nepostojanja jasnih propisa za koriscenje diskrecionih ovlascenja. |

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| Puna transparentnost u procedurama odlucivanja u oblastima iz nadleznosti Drustva; | izvršni direktor | Kontinuirano |

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| članovi odbora direktora |
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| Kontrola od strane Osnivača | izvršni direktor | kontinuirano |  |
| odbor direktora |  |
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| Interna revizija | izvršni direktor | kontinuirano |  |
| rukovodioc sektora ekonomsko-pravnih poslova |
| šef računovodstva |
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| 1.2 | Rukovođenje i upravljanje |

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| izvršni direktor |
| sefovi sluzbi |
| svi zaposleni |
| rukovodioc sektora ekonomsko-pravnih poslova |
| rukovodilac sektora tehnike |

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| narušavanje integriteta Društva |
| gubitak povjerenja građana u rad službenika Društva |

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| interna akta Društva |
| Zakoni i podzakonska akta |

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| Neadekvatno sprovođenje nadzora i kontrole nad radom organizacionih jedinica DruštvaOdstupanja u sprovođenju strrategije razvoja Društva programa i planova rada |

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| Redovno izvještavanje o sprovedenim kontrolama | izvršni direktor | Kontinuirano |

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| lice za upravljanje i kontrolu |
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| 1.2 | Rukovođenje i upravljanje |

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| izvršni direktor |
| sefovi sluzbi |
| svi zaposleni |
| rukovodioc sektora ekonomsko-pravnih poslova |
| rukovodilac sektora tehnike |

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| narušavanje integriteta Društva |
| gubitak povjerenja građana u rad službenika Društva |

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| interna akta Društva |
| Zakoni i podzakonska akta |

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| Neadekvatno sprovođenje nadzora i kontrole nad radom organizacionih jedinica DruštvaOdstupanja u sprovođenju strrategije razvoja Društva programa i planova rada |

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| Praćenje realizacija preporuka za unapređenje rada | izvršni direktor |  |

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| Redovno u toku godineizvještavati o sprovođenju strateških dokumenata ,planova i programa | izvršni direktor | kontinuirano |  |
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| Objavljivati informacije od javnog interesa | izvršni direktor | kontinuirano |  |
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| 1.3 | Rukovođenje i upravljanje |

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| izvršni direktor |
| sefovi sluzbi |
| rukovodioc sektora ekonomsko-pravnih poslova |
| rukovodilac sektora tehnike |
| članovi odbora direktora |

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| Nepostojanje jasne strategije upravljanja, misije i vizije |

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| Zakoni i podzakonska akta |
| interna akta Društva |
| Izvještaji relevantnih domaćih i međunarodnih subjekata |

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| Neadekvatno kreiranje politike razvoja i upravljanja (utvrđivanje nisije , vizije,stategije i planova |

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| Osigurati učešće svih relevantnih subjekata i službi prilikom kreiranja politike razvoja i upravljanja  | izvršni direktor | kontinuirano |

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| sefovi sluzbi |
| članovi odbora direktora |
| rukovodioc sektora ekonomsko-pravnih poslova |
| rukovodilac sektora tehnike |
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| 1.4 | Rukovođenje i upravljanje |

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| izvršni direktor |

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| krsenje principa transparentnosti |

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| Zakon i podzakonska akta |

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| Nepostojanje pravnog akta kojim je utvrđena forma i sadržaj putnog naloga, odnosno uslovi i način korišćenja prevoznih sredstava u svojini Društva |

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| Donijeti Pravilnik/Odluku o uslovima i načinu korišćenja službenih vozilau vlasništvu Društva, kojim će se definisati obrazac putnog naloga na isti način na koji je standardizovan na nivou Opštine Kotor | izvršni direktor |  |

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| šef službe za opšte pravne poslove |
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| 2.1 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| izvršni direktor |
| odbor direktora |

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| Primanje nedozvoljenih poklona ili druge nedozvoljene koristi |

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| Zakon o sprječavanju korupcije |

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| Primanje poklona (javnih funkcionera) suprotno odredbama Zakona o spriječavanju korupcije |

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| Vršiti redovnu kontrolu evidencije o primljenim poklonima | izvršni direktor | kontinuirano |

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| lice zaduženo za evidenciju poklona javnih  |
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| 2.1 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| izvršni direktor |
| odbor direktora |

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| Primanje nedozvoljenih poklona ili druge nedozvoljene koristi |

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| Zakon o sprječavanju korupcije |

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| Nepoštovanje zakonske obaveze evidentiranja primljenih poklona i njihove vrijednosti |

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|  | funkcionera i zaposlenih |  |

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| 2.2 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| izvršni direktor |
| odbor direktora |

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| Narušavanje principa transparentnosti |

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| Zakon o sprječavanju korupcije |

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| Neblagovremeno i nepotpuno dostavljanje Izvještaja o imovini i prihodima javnih funkcionera (Izvršni direktor i Odbor direktora) |

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| Redovno dostavljati Izvještaje o imovini i prihodima javnih funkcionera | izvršni direktor | kontinuirano |

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| članovi odbora direktora |
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| 2.3 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| izvršni direktor |
| sefovi sluzbi |
| svi zaposleni |
| rukovodilac sektora tehnike |
| rukovodioc sektora ekonomsko-pravnih poslova |

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| Neprijavljivanje korupcije i drugih nezakonitih radnji |

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| Obuke i seminari |
| Etički kodeks |
| Zakon o sprječavanju korupcije |

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| nedovoljno razvijen nivo svijesti zaposlenih za prijavljivanje korupcije i drugih nezakonitih radnji unutar Društva |

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| Edukacija zaposlenih o mehanizmima prijavljivanja korupcije i drugih nezakonitih radnji unutar Društva  | sefovi sluzbi | kontinuirano |

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| izvršni direktor |
| rukovodioc sektora ekonomsko-pravnih poslova |
| rukovodilac sektora tehnike |
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| 2.4 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| svi zaposleni |
| izvršni direktor |

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| Nesavjestan i nestručan rad |
| Neblagovremeno i neažurno obavljanje povjerenih poslova |

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| Statut |
| Pojedinačni kolektivni ugovor |
| Zakon i podzakonska akta |

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| Nedovoljno stručno usavršavanje  |

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| Naložiti svim rukovodiocima organizacionih jedinica da obezbjede stručno i blagovremeno izvršavanje radnih obaveta 1 | sefovi sluzbi | kontinuirano |

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| izvršni direktor |
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| 2.5 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| izvršni direktor |

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| Neefikasna i neracionalna kadrovska politika |

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| Interna akta Društva |

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| Nedovoljni kadrovski kapaciteti u određenim organizacionim jedinicama |

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| Izvršiti procjenu potrebnog kadra za efikasno sprovođenje poslova iz nadležnosti Društva | izvršni direktor | kontinuirano |

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| Popuniti upražnjena radna mjesta u skladu sa Pravilnikom o sistematizaciji i organizaciji radnih mjesta | izvršni direktor | kontinuirano |  |
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| 2.5 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| izvršni direktor |

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| Neefikasna i neracionalna kadrovska politika |

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| Interna akta Društva |

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| Nedovoljni kadrovski kapaciteti u određenim organizacionim jedinicama |

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| 2.6 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| izvršni direktor |
| sefovi sluzbi |
| svi zaposleni |
| članovi izvršnog odbora |
| rukovodioc sektora ekonomsko-pravnih poslova |
| rukovodilac sektora tehnike |

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| Sukob interesa |

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| Etički kodeks |
| Zakon i podzakonska akta |

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| Mogućnost nastanka sukoba interesa prilikom donošenja odluka i sprovođenja zakonskih procedura |

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| Donijeti interno upustvo za kontrolu i evidenciju postojanja sukoba interesa i periodična kontrola zahtjeva za izuzeće | izvršni direktor |  |

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| sefovi sluzbi |
| rukovodilac sektora tehnike |
| rukovodioc sektora ekonomsko-pravnih poslova |
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| 2.7 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| izvršni direktor |
| odgovorno lice za prijem i postupanje po prijavi zviždača |

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| Neprijavljivanje korupcije i drugih nezakonitih radnji |
| Ugrožavanje službenog lica kod otkrivanja i prijavljivanja sumnje na korupciju i druge povrede integriteta  |

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| Zakon o sprječavanju korupcije |
| Zakon o zaštiti diskriminacije na radnom mjestu |

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| Narušavanje zaštite identiteta i prava zviždača |

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| Obezbjediti zaštitu zviždača od svih oblika diskriminacije i ograničenja i uskraćivanja prava zviždača | izvršni direktor | kontinuirano |

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| odgovorno lice za prijem i postupanje po prijavi zviždača |
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| Obavještavati zviždača o mjerama koje su preduzete po njihovoj prijavi | odgovorno lice za prijem i postupanje po prijavi zviždača | kontinuirano |  |
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| Postupati po preporukama Agencije za spriječavanje korupcije (u slučajevima kad Agencija sprovodi postupak po prijavi) Izvještavati Agenciju o preduzetim radnjama | izvršni direktor | kontinuirano |  |
| odgovorno lice za prijem i postupanje po prijavi zviždača |
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| 3.1 | Planiranje i upravljanje finansijama |

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| izvršni direktor |
| šef računovodstva |
| rukovodioc sektora ekonomsko-pravnih poslova |

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| Neadekvatno planiranje i izvršavanje budžeta |
| Zloupotreba sredstava iz Budžeta |

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| Zakon i podzakonska akta |
| Opšta akta Društva |

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| Neadekvatno planiranje Budžeta-finansijskog plana Neadekvatno i nedovoljno transparentno trošenje budžetskih sredstavaNedovoljna transparentnost trošenja sredstava i zapošljavanja u toku  |

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| Osigurati učešće svih relevantnih subjekata i jedinica prilikom planiranja budžeta.(finansijskog plana) | izvršni direktor | kontinuirano |

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| sefovi sluzbi |
| rukovodioc sektora ekonomsko-pravnih poslova |
| rukovodilac sektora tehnike |
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| 3.1 | Planiranje i upravljanje finansijama |

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| izvršni direktor |
| šef računovodstva |
| rukovodioc sektora ekonomsko-pravnih poslova |

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| Neadekvatno planiranje i izvršavanje budžeta |
| Zloupotreba sredstava iz Budžeta |

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| Zakon i podzakonska akta |
| Opšta akta Društva |

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| izborne kampanje |

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| Redovno sprovođenje unutrašnjih finansijskih kontrola  | izvršni direktor | kontinuirano |  |
| rukovodioc sektora ekonomsko-pravnih poslova |
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| Postupati po preporukama iz izvještaja o izvršenoj reviziji  | izvršni direktor | kontinuirano |  |
| rukovodioc sektora ekonomsko-pravnih poslova |
| šef računovodstva |
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| Redovno u toku izborne kampanje objavljivati i dostavljati Agenciji za spriječavanje korupcije sva dokumenta shodno zakonu o finansiranju političkih partija i izbornih kampanja (analitičke kartice, putnr naloge i odluke o zapošljavanju sa pratećom dokumentacijom) | rukovodioc sektora ekonomsko-pravnih poslova | kontinuirano |  |
| šef računovodstva |
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| 3.2 | Planiranje i upravljanje finansijama |

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| izvršni direktor |
| rukovodioc sektora ekonomsko-pravnih poslova |
| službenik za javne nabavke i osiguranje |

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| Neadekvatno sprovođenje postupaka javnih nabavki |
| Prekoračenje i zloupotreba službenih nadležnosti |
| Nezakonit uticaj |

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| Zakon i podzakonska akta |
| Obaveza sastavljanja izvještaja |
| Ugovor o javnoj nabavci |

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| Odstupanje od realizacije aktivnosti predviđenih ugovorima o javnoj nabavci  |

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| Donijeti interno uputstvo za sprovođenje javnih nabavki | izvršni direktor | kontinuirano |

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| Kvartalno izvještavati rukovodstvo o realizaciji ugovora o javnim nabavkama  | službenik za javne nabavke i osiguranje | kontinuirano |  |
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| 3.3 | Planiranje i upravljanje finansijama |

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| izvršni direktor |
| službenik za javne nabavke |
| članovi komisije za otvaranje i vrednovanje ponuda |
| rukovodioc sektora ekonomsko-pravnih poslova |

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| Nedozvoljeno lobiranje i drugi nejavni uticaj ili drugi oblik kršenja principa transparentnosti |
| Nezakonitosti i narušavanje integriteta u postupcima javnih nabavki  |

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| Zakon i podzakonska akta |
| Portal javnih nabavki |

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| Nedovoljna transparentnost javnij nabavki Postoji mogućnost davanja prednosti određenoj firmi kroz neobjektivno bodovanje pristiglih ponuda ili sukoba interesa |

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| Objavljivati ugovore i sve anekse ugovora na internet stranici  | službenik za javne nabavke i osiguranje | kontinuirano |

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| Objavljivati pozive za učešće u postupcima javnih nabavki i druge dokumente  | službenik za javne nabavke i osiguranje | kontinuirano |  |
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| 4.1 | Čuvanje i bezbjednost podataka i dokumenata |

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| izvršni direktor |
| sefovi sluzbi |
| rukovodioc sektora ekonomsko-pravnih poslova |
| rukovodilac sektora tehnike |
| svi zaposleni |

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| Curenje informacija |
| Iskorišćavanje javne funkcije ili službenog položaja |
| Ugrožavanje zaštite podataka |
| Nedozvoljeno davanje dokumentacije na uvid trećim licima |

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| interna akta Društva |
| Pojačan službeni i stručni nadzor |

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| Nedovoljna IT bezbjednost podataka kao i njihovo korišćenje u privatne svrhe |

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| Obezbjediti kontinuirani stručni nadzor nad podacima  | izvršni direktor | kontinuirano |

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| lice za upravljanje i kontrolu |
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| 4.2 | Čuvanje i bezbjednost podataka i dokumenata |

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| izvršni direktor |
| rukovodilac sektora tehnike |
| rukovodioc sektora ekonomsko-pravnih poslova |
| svi šefovi |

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| Curenje informacija |
| Nesavjestan i nestručan rad |
| Nedozvoljeno davanje dokumentacije na uvid trećim licima |

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| Edukacija |
| interna akta Društva |
| Podzakonska akta |

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| Neadekvatan i neefikasan sistem kontrole nad prijemom i razvrstavanjem dokumentacije Gubitak dokumentacije |

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| Vršiti redovne kontrole nad prijemom i razvrstavanjem dokumentacije u cilju spriječavanja i gubljenja , oštećenja i neevidentiranja dokumentacije | izvršni direktor | kontinuirano |

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| 5.1 | ODNOSI SA JAVNOŠĆU |

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| izvršni direktor |
| svi zaposleni |

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| krsenje principa transparentnosti |
| narušavanje integriteta Društva |
| Gubitak povjerenja građana u rad službenika i Društva |

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| postojeći zakoni |
| Podzakonska akta |

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| Nedovoljna informisanost javnosti o radu DruštvaNedovoljna i nekoordinisana saradnja između različitih organizacionih jedinica |

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| Odrediti službenika za duženog za odnose sa javnošću | izvršni direktor |  |

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| Povećati broj informacija o radu Društva po sopstvenoj inicijativii na zahtjev medija i javnosti | izvršni direktor | kontinuirano |  |
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| 5.1 | ODNOSI SA JAVNOŠĆU |

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| izvršni direktor |
| svi zaposleni |

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| krsenje principa transparentnosti |
| narušavanje integriteta Društva |
| Gubitak povjerenja građana u rad službenika i Društva |

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| postojeći zakoni |
| Podzakonska akta |

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| Nedovoljna informisanost javnosti o radu DruštvaNedovoljna i nekoordinisana saradnja između različitih organizacionih jedinica |

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| Unaprijediti kvalitet i kvantitet informacija na web stranici Društva | koordinator za informacione tehnologije |  |

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| Redovno i blagovremeno dostavljati informacije PR  | izvršni direktor | kontinuirano |  |
| svi zaposleni |
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| Unaprijed pripremljen predlog odgovora u odnosu na moguća pitanja koja su od javnog interesa ili izazivaju posebno interesovanje medija i javnosti | sefovi sluzbi | kontinuirano |  |
| rukovodilac sektora tehnike |
| rukovodioc sektora ekonomsko-pravnih poslova |
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| 6.1 | Slobodan pristup informacijama  |

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| izvršni direktor |
| službenik za slobodan pristup informacijama |

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| krsenje principa transparentnosti |

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| Zakon o slobodnom pristupu informacijama |

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| Neobjavljivanje dokumenata shodno Zakonu o slobodnom pristupu inforemacijama Neosnovano uskraćivanje podnosiocu zahtjeva pristupu informacijama  |

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| Izvještavati o broju podnijetih i riješenik zahtjeva | službenik za slobodan pristup informacijama | kontinuirano |

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|  | **PODNOSILAC IZVJEŠTAJA** |  | **STARJEŠINA/ODGOVORNO LICE U ORGANU VLASTI** |  |
|  | **Menadžer integriteta** |  |  |  |  |
|  | **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |  | **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |