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|  |  Plan integriteta |  |
|  |  D.O.O. „Komunalne djelatnosti“ Šavnik |  |
|  | 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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| 1.2 | Rukovođenje i upravljanje |

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| članovi izvršnog odbora |
| izvršni direktor |

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| Donošenje nezakonitih odluka |

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| Zakon o radu |
| Statut |
| Pravilnik o organizaciji i sistematizaciji radnih mjesta |

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| neizvršavanje zakona, odluka i drugih akata društva. donošenje odluka pod eksternim uticajem, suprotno javnom interesu zbog nepostojanja jasnih propisa za korišćenje diskrecionih ovlašćenja |

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| Puna transparentnost u procedurama odlučivanja u oblastima iz nadležnosti društva  | sekretar | kontinuirano |

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|  Praćenje postojećih procedura i pokretanje novih koje obezbjeđuju veći stepen zakonitosti u donošenju odluka  | sekretar | tokom godine |  |
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|  Kontinuirana obuka i podizanje svijesti o značenju integriteta | izvršni direktor | kontinuirano |  |
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| 1.3 | Rukovođenje i upravljanje |

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| članovi izvršnog odbora |
| izvršni direktor |

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| Sukob interesa |

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| Etički kodeks |
| Zakon o radu |
| Podzakonska akta |

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| mogućnost nastanka sukoba interesa prilikom donošenja odluka i sprovođenje zakonskih procedura |

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| donijeti interno uputstvo za kontrolu i evidenciju postojanja sukoba interesa | izvršni direktor | kontinuirano |

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| 1.4 | Rukovođenje i upravljanje |

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| izvršni direktor |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |

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| Podzakonska akta |
| Zakon o radu |

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| podizanje svijesti o značenju lobiranja u opštem interesu | izvršni direktor | kontinuirano |

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

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| izvršni direktor |
| rukovodilac pravne službe |
| rukovodilac finansijske službe |

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| Narušavanje integriteta institucije |

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| Zakon o radu |
| Statut |
| Podzakonska akta |
| Pravilnik o organizaciji i sistematizaciji radnih mjesta |

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| donošenje plana integriteta | izvršni direktor | kontinuirano |

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| rukovodilac pravne službe |
| rukovodilac finansijske službe |
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| 2.3 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| izvršni direktor |
| rukovodilac pravne službe |
| rukovodilac finansijske službe |

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| Nesavjestan rad |
| Nestručan i neprofesionalan rad |
| Neblagovremeno i neažurno obavljanje povjerenih poslova |

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| Statut |
| Pravilnik o organizaciji i sistematizaciji radnih mjesta |
| Podzakonska akta |

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| određen broj zaposlenih nema položen poseban stručni ispit |

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| Naložiti svim rukovodiocima organizacionih jedinica da obezbijede puno sprovođenje obaveze o opštem i posebnom programu obuke za sve zaposlene u roku od 6 mjeseci | izvršni direktor | kontinuirano |

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| rukovodilac finansijske službe |
| rukovodilac pravne službe |
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| 2.4 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| izvršni direktor |
| rukovodilac finansijske službe |
| rukovodilac pravne službe |

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| Neefikasna i neracionalna kadrovska politika |

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| Zakon o radu |
| Podzakonska akta |

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| Nekontrolisana mogućnost donošenja diskrecionih odluka i drugih odluka od značaja za rad Nedovoljna kadrovska osposobljenost DruštvaKadrovski plan nije usklađen sa potrebama Društva |

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| Jačanje menadžerskih vještina kod rukovodilaca  | izvršni direktor | kontinuirano |

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| Ispunjavanje aktivnosti utvrđenih internom strategijom i planom rada Društva  | članovi upravnog odbora | kontinuirano |  |
| sekretar |
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| izvršni direktor |  |
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|  Izvršiti procjenu potrebnog kadra za efikasno sprovođenje poslova  | članovi upravnog odbora | nakon sprovedenog konkursa za izbor izvršnog direktoraa |  |
| izvršni direktor |
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|  Popuniti upražnjena radna mjesta u skladu sa Pravilnikom o unutrašnjoj organizaciji i sistematizaciji radnih mjesta | izvršni direktor | do kraja godine donijeti novi Pravilnik  |  |
| upravni odbor |
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| 2.4 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| izvršni direktor |
| rukovodilac finansijske službe |
| rukovodilac pravne službe |

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| Neefikasna i neracionalna kadrovska politika |

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| Zakon o radu |
| Podzakonska akta |

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| Nekontrolisana mogućnost donošenja diskrecionih odluka i drugih odluka od značaja za rad Nedovoljna kadrovska osposobljenost DruštvaKadrovski plan nije usklađen sa potrebama Društva |

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

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| svi zaposleni |

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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 vrijednostiNebagovremeno i nepotpuno dostavljanje izvještaja o imovin i prihodima zaposlenih |

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| Obezbjeđenje redovne edukacije o značenju korupcije | svi zaposleni | kontinuirano |

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

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| izvršni direktor |

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| Neprijavljivanje korupcije i drugih nezakonitih radnji |

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| Etički kodeks |

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| Nedovoljnan razvijen nivo svijesti zaposlenih za prijavljivanje korupcije i drugih nezakonitih radnji unutar DruštvaNedovoljna informisanost o obavezi prijavljivanja poklona |

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| Donijeti interno uputstvo za evidenciju prijava korupcije unutar Društva i postupanje po prijavama kao i zaštiti identiteta lica koje je podnijelo prijavu  | sekretar |  |

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| izvršni direktor |
| upravni odbor |
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|  |  | 31.12.2023. |  |
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|  Uvođenje obaveze da se na Kolegijumu zaposlenih raspravlja o temi integriteta i prevenciji korupcije  | izvršni direktor | 31.12.2021. |  |
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| Edukacija zaposlenih o mehanizmima prijavljivanja korupcije i drugih nezakonitih radnji unutar Društva sa posebnim osvrtom na lica koja obavljaju rizične grupe poslova  | izvršni direktor | na godišnjem nivou |  |
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|  |  | 01.09.2024. |  |
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|  Vršiti obuku zaposlenih o etici i integritetu  | izvršni direktor | na godišnjem nivou |  |
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| 2.6 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| izvršni direktor |

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| Neprijavljivanje korupcije i drugih nezakonitih radnji |

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| Etički kodeks |

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| Nedovoljnan razvijen nivo svijesti zaposlenih za prijavljivanje korupcije i drugih nezakonitih radnji unutar DruštvaNedovoljna informisanost o obavezi prijavljivanja poklona |

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|  Vršiti provjeru stečenog znanja  | izvršni direktor | kontinuirano |

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|  |  | 31.12.2023. |  |
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|  Obezbijediti redovno sprovođenje plana i programa stručnog usavršavanja | izvršni direktor | kontinuirano |  |
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|  |  | 01.01.2023. |  |
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|  Sprovoditi obuke zaposlenih o etici i integritetu  | izvršni direktor | kontinuirano |  |
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|  |  | 31.12.2023. |  |
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|  Vršiti provjeru stečenog znanja  | upravni odbor | kontinuirano |  |
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|  Podnošenje Izvještaja o radu  | izvršni direktor |  |  |
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|  |  | 31.03.2024. |  |
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| Obezbijediti redovno sprovođenje plana i programa usavršavanja  | izvršni direktor |  |  |
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|  |  | 31.12.2024. |  |
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|  Sprovoditi obuke zaposlenih i vršiti provjeru stečenog znanja | izvršni direktor | na godišnjem novou |  |
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| 2.7 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| izvršni direktor |
| rukovodilac finansijske službe |
| rukovodilac pravne službe |

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| Povrede profesionalnih, etičkih pravila i pristrasno ponašanje |

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| Interna akta institucije |

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| Nedostatak stručnog znanja i vještina kadra |

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| Podnošenje Izvještaja o radu  | izvršni direktor | na godisnjem nivou |

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| 2.7 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| izvršni direktor |
| rukovodilac finansijske službe |
| rukovodilac pravne službe |

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| Povrede profesionalnih, etičkih pravila i pristrasno ponašanje |

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| Interna akta institucije |

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| Nedostatak stručnog znanja i vještina kadra |

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| Obezbijediti redovno sprovođenje plana i programa usavršavanja  | izvršni direktor | na godišnjem nivou |

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|  |  | 01.06.2024. |  |
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|  Sprovoditi obuke zaposlenih  | izvršni direktor | na godišnjem nivou |  |
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|  |  | 10.10.2023. |  |
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|  Vršiti provjeru stečenog znanja | izvršni direktor | kontinuirano |  |
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| 2.8 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| izvršni direktor |

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| Statut |
| Zakon o radu |
| Podzakonska akta |

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| interni akt kojim će se precizirati procedura zapošljavanja u pogledu trajanja oglašavanja,provjere radne spossobnosti kandidata,bodovanje i slično |

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| Puna transparentnost u oglašavanju slobodnih radnih mjesta u trajanju od jednog dana, kao i oglašavanje istog u danimma vikenda | izvršni direktor | kontinuirano |

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| 2.9 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| izvršni direktor |
| rukovodilac pravne službe |
| rukovodilac finansijske službe |

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| Neprijavljivanje podataka o sponzorstvima i donacijama |

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| Izvještaj o radu |

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| Dostaviti agenciji za sprječavanje korupcije do kraja marta tekuće za prethodnu godinu Pisani izvještaj o primljenim sponzorstvima i donacijama sa kopijom dokumentacije u vezi sa tim sponzorstvima ili donacijama, na propisanom obrascu |

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| Vršiti redovnu kontrolu evidencije o primljenim sponzorstvima i donacijama | izvršni direktor | kontinuirano |

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| 2.10 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| izvršni direktor |
| rukovodilac pravne službe |
| rukovodilac finansijske službe |

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| Zakon o budžetu |
| Podzakonska akta |

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| Redovno u toku izborne kampanje objavljivati i dostavljati Agenciji za sprječavanje korupcije sve dokumente shodno Zakonu o finansiranju političkih subjekata i izbornih kampanja (analitičke kartice,putne naloge,i odluke o zapošljavanju sa pratećom dokumentacijom) |

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| Redovno u toku izborne kampanje objavljivati i dostavljati Agenciji za sprječavanje korupcije sve dokumente shodno Zakonu o finansiranju političkih subjekata i izbornih kampanja (analitičke kartice,putne naloge,i odluke o zapošljavanju sa pratećom dokumentacijom | izvršni direktor | kontinuirano |

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| 2.10 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| izvršni direktor |
| rukovodilac pravne službe |
| rukovodilac finansijske službe |

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| Zakon o budžetu |
| Podzakonska akta |

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| Redovno u toku izborne kampanje objavljivati i dostavljati Agenciji za sprječavanje korupcije sve dokumente shodno Zakonu o finansiranju političkih subjekata i izbornih kampanja (analitičke kartice,putne naloge,i odluke o zapošljavanju sa pratećom dokumentacijom) |

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| 2.11 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| svi zaposleni |

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| Zakon o radu |

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| Donijeti pravilnik iili odluku o uslovima i načinu korišćenja službenih vozila u vlasništvu organa, kojim će se definisati obrazac putnog naloga na isti način na koji je standardizovan na nivou opštine |

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| Donijeti pravilnik iili odluku o uslovima i načinu korišćenja službenih vozila u vlasništvu organa, kojim će se definisati obrazac putnog naloga na isti način na koji je standardizovan na nivou opštine | svi zaposleni | kontinuirano |

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| 3.2 | Planiranje i upravljanje finansijama |

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| izvršni direktor |
| rukovodilac finansijske službe |
| rukovodilac pravne službe |

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| Neadekvatno planiranje i izvršavanje budžeta |

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| Zakon o budžetu |

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| Neadekvatno planiranje budžeta |

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| Osigurati učešće svih relevantnih subjekata i jedinica prilikom planiranja budžeta  | izvršni direktor | kontinuirano |

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| Pohađati relevantne obuke i seminare na temu planiranja budžeta | svi zaposleni | kontinuirano |  |
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| 3.3 | Planiranje i upravljanje finansijama |

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| službenik za javne nabavke |

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| Donošenje nezakonitih odluka |

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| Zakon o javnim nabavkama |

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| Postoji mogućnost davanja prednosti određenoj firmi kroz neobjektivno bodovanje pristiglih ponuda zbog prijateljskih i rođačkih veza (klijentelizam, nepotizam, kronizam) ili sukoba interesa |

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| 30 Provjera izjava o nepostojanju sukoba interesa članova tenderskih komisija i službenika za javne nabavke i obrazaca za imovinu | službenik za javne nabavke | kontinuirano |

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| 4.2 | Čuvanje i bezbjednost podataka i dokumenata |

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| izvršni direktor |
| rukovodilac pravne službe |
| rukovodilac finansijske službe |

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| Curenje informacija |

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| Interna akta institucije |

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| Neažurnost u prikupljanju i obradi podataka, nedovoljna bebjednost čuvanja podataka, kao i njihovo  |

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| Utvrditi jasne procedure za čuvanje, evidentiranje, prikupljanje i obradu podataka i dokumenata  | šef računovodstva | kontinuirano |

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| 4.2 | Čuvanje i bezbjednost podataka i dokumenata |

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| izvršni direktor |
| rukovodilac pravne službe |
| rukovodilac finansijske službe |

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| Curenje informacija |

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| Interna akta institucije |

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| korišćenje za neslužbene svrhe |

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| Razmotriti mogućnost uvođenja posebnog IT sistema za elektronsko čuvanje podataka  | izvršni direktor | kontinuirano |  |
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|  |  | 31.12.2023. |  |
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| Obezbijediti kontinuirani stručni nadzor nad podacima  | šef računovodstva | kontinuirano |  |
| šef službe za opšte pravne poslove |
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|  |  | 01.04.2024. |  |
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|  Obučiti zaposlene da rukuju sa podacima u elektronskoj formi | izvršni direktor | kontinuirano |  |
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|  |  | 01.01.2024. |  |
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