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|  |  Izvještaj o sprovođenju plana integriteta za 2020. godinu |  |
|  |  JU Škola za osnovno muzičko obrazovanje Herceg Novi |  |
|  | 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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| Sukob interesa |

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| Dobijanje saglasnost od strane Ministarstva prosvjete da su obezbieđena finansijska sredstva |

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| Zasnivanje radnog odnosa na osnovu objektivnih kriterijuma i transparentnih procedura |

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| dosljedna primjena propisanih pravila i kriterijuma zaprijem u radni odnos | direktorica | Kontinuirano |

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 | RealizovanoDobijena Saglasnost od strane Ministarstva prosvjete da su obezbjeđena sredstva za potrebna radna mjesta, raspisan konkurs i zaključeni Ugovori o radu  |
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| 1.2 | Rukovođenje i upravljanje |

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| Donošenje nezakonitih odluka |

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| Zakoni i podzakonska akta Interni akti institucije |

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| Donošenje odluka pod uticajem eksternih i drugih neprihvatljivih uticajaUpotreba širokih diskrecionih ovlašćenja |

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| Jačanje transparentnost prilikom donošenja odluka, propisa i drugih opštih akataVršenje redovne kontrole u procesu odluičivanja i usaglašenosti odluka sa zakonom  | direktorica | Kontinuirano |

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 | RealizovanoUredjeno Statutom JUŠOMO, formirana komisija za izbor drugih zaposlenih |
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| 2.1 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| Zloupotreba položaja |

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| Opasnost od nedosljednosti prilikom zapošljavanja i produžavanja ugovora o  |

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| Novi pristup i kontola zapošljava nja kroz analizu opterečenja zaposlenih i potrebe za novim kadrovima |

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| Izrada sistematizacije po odsjecima na osnovu broja upisanih đaka, analiza ugovora o dopunskom radu ,usaglašavanje svake  | direktorica | Kontinuirano |

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 | RealizovanoSve odluke , propisi i opšti akti istaknuti na oglasnoj  |
| sekretar |
| Komisija za prijem drugih radnika |
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| 2.1 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| Zloupotreba položaja |

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| dopunskom radu,minimumu prosječne ocjene kao uslov za angažman |

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| Novi pristup i kontola zapošljava nja kroz analizu opterečenja zaposlenih i potrebe za novim kadrovima |

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| školske godine sa realnim potrebama,povećanje transparentnosti postupka objavljivanje potrebe na sajtu školeJavan rad Komisije za prijem drugih ra Obavjestiti sve zaposlene o prijemu prijava za zapošljavanje dnika  |  |  |

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 | tabli i sajtu škole . |
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| 2.2 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| Narušavanje principa transparentnosti |

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| Zakon o sprječavanje korupcije |

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| Neblagovremeno i nepotpuno dostavljanje izvještaja o imovini i prihodima javnih funkcionera |

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| Redovno dostavljati izvještaje o imovini i prihodima javnih funkcionera Agenciji za sprječavanje korupcije | direktorica | Kontinuirano |

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 | RealizovanoDostavljen izvještaje o imovini i prihodima javnih funkcionera Agenciji za sprječavanje korupcije |
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| 2.3 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktorica |
| svi zaposleni |

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| Primanje nedozvoljenih poklona ili druge nedozvoljene koristi |

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| Zakon o sprječavanje korupcije |

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| Primanje pokolona suprotno odredbama Zakona o sprječavanju korupcijeNepoštovanje zakonske obaveze evidentiranja primljenih poklona i njihove vrijednostiNedostavljanje Agenciji za sprječavanje korupcije izvodi iz evidencije poklona |

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| Donešen Pravilnik o načinu vođenja registra sponzorstava i donacija i sadržini izvještaja o primjenim sponzorstvima i donacijama. Dostaviti Agenciji za sprječavanje korupcije pisani izvještaj o primjenim sponzorstvima i donacijama sa kopijom dokumentacije u vezi sa tim sponzorstvima i donacijama na propisanom obrascu za prethodnu godinu do kraja marta tekuće godine za prethodnu godinu | direktorica | Kontinuirano |

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 | RealizovanoDonijet Pravilnikj o sadržaju i načinu vođenja evidencije poklona. |
| svi zaposleni |
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| 2.4 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| Neprijavljivanje korupcije i drugih nezakonitih radnji |

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| Zakon o sprječavanje korupcije |

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| Nije određeno lice za prijem i postupanje po prijavi zviždačaNeadekvatno postupanje po prijavama zviždačaNarušavanje zaštite identiteta i prava zviždača |

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| Odrediti lice za prijem i postupanje po prijavi zviždačaDonijeti interno uputstvo za evidenciju prijava korupcijeunutar institucije i postupanje po prijavama , kao i zaštitu identiteta lica koje je podnijelo prijavuObezbijediti zaštitu zviždača od svih oblika diskriminacije i ograničenja i uskraćivanja prava zviždačaObavještavati zviždače o mjerama koje su preduzete po njihovoj prijaviPostupati po preporukama Agencije za sprječavanje korupcije (u slučajevimakad Agencija sprovodi postupak po prijavi), i izvještavati Agenciju o preduzetim radnjamaVršiti kontinuiranu obuku zaposlenih na temu etike i integriteta | direktorica | Kontinuirano |

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 | Djelimično realizovanoOdređeno lice za prrijem i postupanje po prijavi zviždača, nismo imali prijave |
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| 2.5 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktorica |

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| Nedovoljna transparentnost trošenja sredstava i zapošljavanja u toku izborne kampanje |

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| Zakon o finansiranju političkih subjekata i izbornih kampanja |

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| Nedovoljna transparentnost trošenja sredstava i zapošljavanja u toku izborne kampanje |

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

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 | RealizovanoDokumentacija je dostavljena Agenciji za sprječavanje korupcije |
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| 2.6 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktorica |
| Nastavnici |

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| Narušavanje principa transparentnosti |

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| Zakoni i podzakonska akta |

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| Gubitak i smanjenje povjerenja javnosti u rad institucije zbog nedovoljne transparentnosti i informisanosti javnosti  |

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| Proaktivno objavljivanje informacija iz člana 12 Zakona o slobodnom pristupu informacija i druge informacije od javnog interesa uz  | direktorica | Kontinuirano |

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 | RealizovanoOmogućen je pristup relevantnih dokumenata  |
| Nastavnici |
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| 2.6 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktorica |
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| Zakoni i podzakonska akta |

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| odgovarajući način zaštite ličnih podataka koji su od značaja za privatnost i podataka koji su označeni stepenom tajnosti u skladu sa zakonom.Omogućiti dostupnost relevantnih dokumenata na web stranici, stranici škole na facebook-u, na oglasnoj tabli i sl. |  |  |

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 | na web stranici, škole na facebook-u, na oglasnim tablama i medijima. |
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| 3.1 | Planiranje i upravljanje finansijama |

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| računovođa |

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| Nepodnošenje kvartalnih finansijskih izvještaja |

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| Pravilnik, interna kontrola |

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| Netransparentnost u postupku raspolaganja budžetskim sredstavimaNeracionalno trošenje budžetskih sredstava |

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| Kontinuirano dostavljanje kvartalnih finansijskih izvještaja o raspolaganju budžetskim sredstvima u skladu sa Pravilnikom o načinu sačinjavanja i podnošenja finasijskih izvještaja budžeta, državnih fondova i jednica lokalne samouprave  | računovođa | Kontinuirano |

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 | RealizovanoKontinuirano se dostavljaju kvartalni finansijski izvještaji o raspolaganju budžetskim sredstvima u skladu sa Pravilnikom o načinu sačinjavanja i podnošenja finasijskih izvještaja budžeta. |
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| 3.2 | Planiranje i upravljanje finansijama |

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| službenik za javne nabavke |

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| Neadekvatno sprovođenje postupaka javnih nabavki |

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| Zakon o javnim nabavkama Podzakonski akti |

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| Sukob interesa u postupku javnih nabavkiOdstupanje od zakonskih proceduraPrekoračenje i zloupotreba službenih nadležnosti |

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| Donošenje plana javnih nabavki za tekuću godinu do kraja januara tekuće godinePodnošenje izvještaja o sprovedenim postupcima javnih nabavki na godišnjem nivou | službenik za javne nabavke | Kontinuirano |

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 | RealizovanoDonošen je plana javnih nabavki za 2021 godinu i objavljen na sajtu UJN, podnešeni su izvještaji za 2020 godinu |
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| 4.1 | Čuvanje i bezbjednost podataka i dokumenata |

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| sekretar |

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| Zloupotreba službenih podataka. |

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| Kontrola korišćenja diskrecionih ovlašćenja zaposlenih. |

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| Pristup podacima od strane neovlašćenih lica |

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| Jačanje transparentnosti rada | sekretar | Kontinuirano |

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 | RealizovanoRad sekretara je transparentan |
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| 4.1 | Čuvanje i bezbjednost podataka i dokumenata |

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| sekretar |

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| Zloupotreba službenih podataka. |

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| Kontrola korišćenja diskrecionih ovlašćenja zaposlenih. |

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| Pristup podacima od strane neovlašćenih lica |

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| 4.2 | Čuvanje i bezbjednost podataka i dokumenata |

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| direktorica |
| sekretar-računovođa |
| ICT koordinator |

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| Ugrožavanje bezbjednosti službenih podataka i dokumentata Nesavjestan i nestručan rad  |

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| Pojačan stručni nadzor |
| Pravilnici i uputstva |
| Interna kontrola |

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| Neadekvatna evidencija i čuvanje službenih podataka i dokumenataCurenje povjerljivih informacija sadržanih u MEIS aplikaciji |

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| Redovna kontrola podataka u MEIS aplikacijiPojačati nadzor Stručna pomoć nastavnom osoblju o MEIS aplikaciji | direktorica | Kontinuirano |

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 | RealizovanoRedovna kontrola podataka u MEIS aplikaciji |
| sekretar-računovođa |
| ICT koordinator |
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| 5.1 | Preporučivanje uzimanja dopunskih časova; uslovljavanje pripreme za godišnji ispit  |

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| nastavno osoblje |

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| Sukob interesa |

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| Odredbe Etičkog kodeksa  |

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| Sporadični slučajevi uzimanja dopunskih časova i uslovljavanje učenika; favorizovanje učenika |

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| Intenzivirati saradnju sa roditeljima | nastavno osoblje | Kontinuirano |

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 | RealizovanoIntenzivirana saradnja sa roditeljima |
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| 6.1 | Pribavljanje materijalne koristi na osnovu korišćenja školskih instrumenata  |

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| nastavno osoblje |

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| Sukob interesa |

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| Saradnja sa roditeljima |

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| Sporadični slučajevi; Uslovljavanje učenika da iznajmljuju školske instrumente |

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| Pojačati saradnju sa roditeljima  | nastavno osoblje | Kontinuirano |

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 | RealizovanoSaradnja sa roditeljima je na zavidnom nivou |
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| 7.1 | Odnosi sa javnošću |

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| svi zaposleni |

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| Nedozvoljeno lobiranje, drugi nejavni uticaj ili drugi oblici kršenja principa transparentnosti ; Narušavanje integriteta institucije; Gubitak povjerenja građana u rad institucije |

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| Postojeći zakoni i podzakonska akta; |

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| Nedovoljna saradnja sa drugim muzičkim školama |

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| Povećati broj informacija o radu škole po sopstvenoj inicijativi na zahtjev medija i javnostiSprovoditi ispitivanja javnog mnenja o radu institucije | svi zaposleni | Kontinuirano |

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 | RealizovanoOdređen službenik zadužen za odnose sa javnošću, transparentan rad škole |
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|  | **PODNOSILAC IZVJEŠTAJA** |  | **STARJEŠINA/ODGOVORNO LICE U ORGANU VLASTI** |  |
|  | **Menadžer integriteta** |  |  |  |  |
|  | **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |  | **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |