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|  |  Plan integriteta |  |
|  |  JU škola za osnovno i srednje muzičko obrazovanje „Dara Čokorilo“ Nikšić |  |
|  | 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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| direktor |
| pomoćnik direktora |

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| Povrede profesionalnih, etičkih pravila i pristrasno ponašanje |

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| Interna akta institucije |

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| Donošenje odluka pod eksternim uticajem, suprotno javnom interesu |

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| Puna transparentnost u procedurama odlučivanja u oblastima iz nadležnosti direktora | direktor | kontinuirano |

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| pomoćnik direktora |
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| 1.2 | Rukovođenje i upravljanje |

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| direktor |
| pomoćnik direktora |

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| Donošenje nezakonitih odluka |

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| Zakon o radu |
| Opšti zakon o obrazovanju i vaspitanju |

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| Nepoštovanje zakonaNezakonito donošenje odluka pri procesu zapošljavanja |

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| Puna transparentnost u procedurama odlučivanja u oblastima iz nadležnosti direktora.  | direktor | kontinuirano |

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| pomoćnik direktora |
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| Odluke/akte učiniti dostupnim na uvid svim zaposlenima;direktor | direktor | kontinuirano |  |
| pomoćnik direktora |
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| 1.3 | Rukovođenje i upravljanje |

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| direktor |
| pomoćnik direktora |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |

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| Interna pravila i procedure |

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| Iskorišćavanje javne funkcije ili službenog položaja |

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| Puna transparentnost u procedurama odlučivanja u oblastima iz nadležnosti direktora | direktor | kontinuirano |

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| 1.4 | Rukovođenje i upravljanje |

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| direktor |
| pomoćnik direktora |

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| Neprijavljivanje korupcije i drugih nezakonitih radnji |

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| Zakon o sprječavanju korupcije |
| Zakoni i podzakonska akta |

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| Neprijavljivanje poklona i odsustvo evidencije poklona Primanje nedozvoljenih poklona ili druge nedozvoljene koristi |

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| Uvesti periodičnu obavezu da prevencija korupcije bude tema sastanka i razgovora | direktor | kontinuirano |

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| 1.4 | Rukovođenje i upravljanje |

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| direktor |
| pomoćnik direktora |

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| Neprijavljivanje korupcije i drugih nezakonitih radnji |

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| Zakon o sprječavanju korupcije |
| Zakoni i podzakonska akta |

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| Neprijavljivanje poklona i odsustvo evidencije poklona Primanje nedozvoljenih poklona ili druge nedozvoljene koristi |

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| Redovna kontrola evidencije o primljenim poklonima direktora. | direktor | kontinuirano |

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| 1.5 | Rukovođenje i upravljanje |

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| direktor |
| pomoćnik direktora |

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| Narušavanje integriteta institucije |

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| Izvještaj o radu |

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| Narušavanje integriteta institucije Narušavanje integriteta zaposlenih |

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| Razmotriti preporuke koje se odnose na razvoj škole | direktor | kontinuirano |

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| 1.6 | Rukovođenje i upravljanje |

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| direktor |
| pomoćnik direktora |

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| Iskorišćavanje javne funkcije ili službenog položaja |

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| Interna akta institucije |
| Evidentiranje primljenih poklona |

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| Neblagovremeno I nepotpuno dostavljannje izvještaja o imovini I prihodima javnog funkcionera – direktoraPrimanje poklona |

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| Redovno dostavljanje izvještaja o imovini I prihodima javnog funkcionera Agenciji za sprečavanje korupcije. | direktor | godišnje |

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| Redovna kontrola evidencije o primljenim poklonima direktora | direktor | kontinuirano |  |
| pomoćnik direktora |
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| 1.7 | Rukovođenje i upravljanje |

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| direktor |
| pomoćnik direktora |

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| Neadekvatno strateško planiranje rada institucije |

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| Podjela radnih zadataka |

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| Odstupanje u sprovođenju strategije razvoja ustanove, programa i plana rada |

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| Izvještavanje o sprovođenju strategije razvoja, mjerama za unapređenje i poboljšanje rada ustanove prema planu razvoja.  | direktor | kontinuirano |

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| školski odbor |
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|  Razmatranje preporuka koje se odnose na razvojni plan ustanove. | direktor | kontinuirano |  |
| školski odbor |  |
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| 1.8 | Rukovođenje i upravljanje |

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| sekretar |

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| Sukob interesa |

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| Zakoni i podzakonska akta |
| Interna akta institucije |

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| Nedovoljno jasna podjela i razgraničenja sistema kontrole i vršenja ovlašćenja zbog velike koncentracije zadataka na samo jednoj osobi;  |

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| Učiniti prepoznatljivim i transparetnim rad i aktivnosti prilikom donošenja odluka i izrade mišljenja; | sekretar | kontinuirano |

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| direktor |
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| 1.8 | Rukovođenje i upravljanje |

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| sekretar |

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| Sukob interesa |

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| Zakoni i podzakonska akta |
| Interna akta institucije |

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| Nedovoljno jasna podjela i razgraničenja sistema kontrole i vršenja ovlašćenja zbog velike koncentracije zadataka na samo jednoj osobi;  |

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| Uspostaviti kriterijume za objektivnu ocjenu rada; | sekretar | kontinuirano |  |
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| 1.9 | Rukovođenje i upravljanje |

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| sekretar |

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| nesavjesno pružanje savjetodavne pomoći |

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| Zakoni i podzakonska akta |
| Interna akta institucije |

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| Nedovoljno jasna podjela i razgraničenja sistema kontrole i vršenja ovlašćenja zbog velike koncentracije zadataka na samo jednoj osobi;  |

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| Jasno definisanje odgovornosti zaposlenih; | sekretar | kontinuirano |

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| Uspostaviti jasne procedure o radu (donijeti smjernice, pravilnike i upustva); | sekretar | kontinuirano |  |
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| 1.10 | Rukovođenje i upravljanje |

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| sekretar |

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| Nezakonito učestvovanje u izradi i pripemi podzakonskih akata |

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| Zakoni i podzakonska akta |
| Interna akta institucije |

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| Nedovoljno jasna podjela i ragaraničenja sistema kontrole i vršenja ovlašćenja zbog velike koncentracije zadataka na samo jednoj osobi |

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| Učiniti prepoznatljivim i transparetnim rad i aktivnosti prilikom donošenja odluka i izrade mišljenja | sekretar | kontinuirano |

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| Uspostaviti kriterijume za objektivnu ocjenu rada | sekretar | kontinuirano |  |
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| 2.1 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |
| pomoćnik direktora |
| ostali zaposleni  |

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| Sukob interesa |

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| Zakoni i podzakonska akta |
| Etički kodeks |

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| Nedovoljno jasna podjela i razgraničenje sistema vršenja i kontrole zadataka |

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| Učiniti prepoznatljivim i transparentnim rad svih zaposlenih | direktor | kontinuirano |

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

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| svi zaposleni |

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| Neprijavljivanje korupcije i drugih nezakonitih radnji;  |

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| Zakoni i podzakonska akta |
| Etički kodeks |

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| Nedovoljano razvijen nivo svijesti za prijavljivanje korupcije i drugih nepravilnosti |

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| Uvesti periodičnu obavezu da prevencija korupcije bude tema sastanaka i razgovora; | svi zaposleni | kontinuirano |

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| Redovna kontrola evidencije o primljenim poklonima direktora. | svi zaposleni | kontinuirano |  |
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| Zaštita zaposlenih koji prijavljuju korupciju ili druge nepravilnosti ili procese koji mogu sadržati rizike od korupcije ili neetično ponašanje | direktor | kontinuirano |  |
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| Održati periodične radionice u organizaciji pedagoga na temu Etično i profesionalno ponašanje zaposlenih kojima će prisustvovati svi zaposleni  | pedagog | polugodišnje |  |
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| Donijeti interno uputstvo za evidenciju prijava korupcije unutar ustanove i postupanje po prijavama | sekretar | godišnje |  |
| direktor |
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| 2.3 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| svi zaposleni |

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| Neblagovremeno i neažurno obavljanje povjerenih poslova |

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| Zakoni i podzakonska akta |
| Interna akta institucije |

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| Nedovoljno razvijen nivo svijesti za blagovremeno i ažurno obavljanje povjerenih poslova |

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|  Izraditi i usvojiti procedure kojima će se jasno definisati odgovornost svih zaposlenih | svi zaposleni | kontinuirano |

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| pedagog |
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| 2.3 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| svi zaposleni |

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| Neblagovremeno i neažurno obavljanje povjerenih poslova |

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| Zakoni i podzakonska akta |
| Interna akta institucije |

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| Nedovoljno razvijen nivo svijesti za blagovremeno i ažurno obavljanje povjerenih poslova |

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| Održati periodične radionice u organizaciji psihologa na temu Etično i profesionalno ponašanje zaposlenih | svi zaposleni | polugodišnje |

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| 2.4 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |

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| Planiranje zapošljavanja i sprovođenje procedure zapošljavanja |

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| Zakoni i podzakonska akta |
| Interna akta institucije |

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| Transparentan proces planiranja zapošljavanja |

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| Učiniti prepoznatljivim i transparetnim rad i aktivnosti prilikom donošenja odluka i izrade mišljenja; | direktor | kontinuirano |

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| Jasno definisanje odgovornosti zaposlenih;  | direktor | kontinuirano |  |
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| Uspostaviti jasne procedure o radu (donijeti smjernice, pravilnike i upustva); | direktor | godišnje |  |
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| 2.5 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| svi zaposleni |

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| Neprijavljivanje poklona i odsustvo evidencije poklona |

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| Zakon o sprječavanju korupcije |
| Etički kodeks |

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| Primanje poklona suprotno odredbama Zakona i neažurno vođenje evidencije o poklonima . |

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| Održati periodične radionice u organizaciji psihologa na temu Etično i profesionalno ponašanje zaposlenih . | svi zaposleni | polugodišnje |

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| psiholog |
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| Dostaviti Agenciji za sprečevanje korupcije u martu tekuće godine pisani Izvještaj o primljenim poklonima, sponzorstvima i donacijama za predhodnu godinu. | direktor | godišnje |  |
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| 2.5 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| svi zaposleni |

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| Neprijavljivanje poklona i odsustvo evidencije poklona |

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| Zakon o sprječavanju korupcije |
| Etički kodeks |

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| Primanje poklona suprotno odredbama Zakona i neažurno vođenje evidencije o poklonima . |

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| Donijeti Interno uputstvo za evidenciju prijave poklona unutar ustanove i postupati po njima | direktor | kontinuirano |

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

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| svi zaposleni |

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| Neadekvatno postupanje po prijavama zviždača i narušavanje zaštite identiteta i prava zviždača |

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| Zakon o sprječavanju korupcije |

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| Neimenovanje zviždačaNeadekvatna zaštita zviždača od svih oblika diskriminacije |

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| Donijeti interno uputstvo za evidenciju prijava korupcije unutar ustanove i postupanje po prijavama | direktor | kontinuirano |

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| pomoćnik direktora |
| ostali zaposleni  |
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| Zaštia zaposlenih koji prijavljuju korupciju ili druge nepravilnosti ili procese koji mogu sadržati rizike od korupcije ili neetično ponašanje | direktor | kontinuirano |  |
| pomoćnik direktora |
| ostali zaposleni  |
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| Obezbijediti zaštitu zviždača od svih oblika diskriminacije | direktor | kontinuirano |  |
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| Obaviještavati zviždača o mjerama koje su preduzete po prijavama | direktor | kontinuirano |  |
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| 3.2 | Planiranje i upravljanje finansijama |

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| direktor |

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| Zloupotreba službenog položaja |

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| Zakoni i podzakonska akta |
| Interne i eksterne kontrole |

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| Neracionalno planiranje I zloupotreba trošenja budžetskih sredstava |

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| Jačanje transparentnosti raspolaganja budžetskim sredstvima | direktor | kontinuirano |

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| 3.2 | Planiranje i upravljanje finansijama |

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| Zloupotreba službenog položaja |

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| Zakoni i podzakonska akta |
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| 3.3 | Planiranje i upravljanje finansijama |

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| Zloupotreba finansijskih ovlašćenja |

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| Zakoni i podzakonska akta |
| Obaveza sastavljanja izvještaja |
| Edukacija |
| Pojačan stručni nadzor |

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| Nepravilni finansijski izvještaji |

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| Jačanje transparentnosti raspolaganja budžetskim sredstvimaKontrola podnošenja Izvještaja o imovini i prihodima | direktor | kontinuirano |

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| 3.4 | Planiranje i upravljanje finansijama |

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| Nepravilno finansijsko izvještavanje i vođenje evidencije |

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| Zakoni i podzakonska akta |
| Obaveza sastavljanja izvještaja |
| Pojačan stručni nadzor |

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| Nedovoljna budžetska sredstva;Finansijski izvještaji |

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| Jačanje transparentnosti raspolaganja budžetskim sredstvimaKontrola podnošenja Izvještaja o imovini i prihodima | računovođa | kontinuirano |

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| 3.5 | Planiranje i upravljanje finansijama |

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| službenik za javne nabavke |
| školski odbor |

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| Nesavjesno planiranje javnih nabavki, izrada i zaključivanje ugovora o javnim nabavkama |

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| Zakon o javnim nabavkama |
| Edukacija |
| Pojačan stručni nadzor |

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| Neracionalno planiranje I zloupotreba sprovođenja javnih nabavki |

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| Kontrola podnošenja Izvještaja o javnim nabavkamaEdukacija | službenik za javne nabavke | kontinuirano |

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| 3.6 | Planiranje i upravljanje finansijama |

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| direktor |
| računovođa |

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| Sukob interesa |

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| Zakoni i podzakonska akta |
| Obaveza sastavljanja izvještaja |
| Interna akta institucije |

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| Finansijski izvještaji Neracionalno trošenje budžetskih sredstavaSukob interesa u postupku javnih nabavki |

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| Jasno definisanje odgovornosti zaposlenih | direktor | kontinuirano |

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| Jačanje transparentnosti raspolaganja budžetskim sredstvima | direktor | kontinuirano |  |
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| Edukacija | direktor | kontinuirano |  |
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| 3.6 | Planiranje i upravljanje finansijama |

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| Interna akta institucije |

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| Finansijski izvještaji Neracionalno trošenje budžetskih sredstavaSukob interesa u postupku javnih nabavki |

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| 4.1 | Čuvanje i bezbjednost podataka i dokumenata |

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| direktor |
| sekretar |

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| Zloupotreba čuvanja i upotrebe pečata |

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| Zakoni i podzakonska akta |

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| Neadekvatno postupanje sa službenom dokumentacijom zbog nedovoljnih mjera bezbjednosti i tehničke sigurnosti |

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| Izrada i primjena uputstva o pravilnom čuvanju i upotrebi pečata  | direktor | kontinuirano |

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| 4.2 | Čuvanje i bezbjednost podataka i dokumenata |

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| pomoćnik direktora |

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| Zloupotreba službenih podataka i informacija |

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| Zakoni i podzakonska akta |
| Interna pravila i procedure |

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| Pristup poadacima od strane neovlašćenih lica,Neadekvatno postupanje sa službenom dokumentacijom i informacijama zbog nedovoljnih mjera bezbjednosti i tehničke sigurnosti |

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| Izrada i primjena baza podataka o čuvanju dokumenata i njihovoj bezbjednosti; | direktor | kontinuirano |

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| pomoćnik direktora |
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| Jačanje transparentnosti rada | direktor | kontinuirano |  |
| pomoćnik direktora |
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| 4.3 | Čuvanje i bezbjednost podataka i dokumenata |

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| sekretar |

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| Nepravilno vođenje kadrovske evidencije i nepravilno arhiviranje  |

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| Zakoni i podzakonska akta |
| Interna pravila i procedure |

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| Pristup podacima od strane neovlašćenih licaNeadekvatno postupanje sa službenom dokumentacijom  |

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| Izrada i primjena baza podataka o čuvanju dokumenata i njihovoj bezbjednosti; | sekretar | kontinuirano |

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| Pravilno vođenje kadrovske evidencije, rukovanje i čuvanje pečata | sekretar | kontinuirano |  |
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| 4.3 | Čuvanje i bezbjednost podataka i dokumenata |

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| sekretar |

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| Nepravilno vođenje kadrovske evidencije i nepravilno arhiviranje  |

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| Zakoni i podzakonska akta |
| Interna pravila i procedure |

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| Pristup podacima od strane neovlašćenih licaNeadekvatno postupanje sa službenom dokumentacijom  |

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| Na osnovu liste kategorija izrada Pravilnika o arhiviranju  | sekretar |  |

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| 4.4 | Čuvanje i bezbjednost podataka i dokumenata |

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| sekretar |
| nastavnik |

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| Nepravilno I netačno vođenje evidencije o učenicima; |

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| Opšti zakon o obrazovanju i vaspitanju |
| Interna pravila i procedure |

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| Pristup poadacima od strane neovlašćenih lica |

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| Izrada i primjena baza podataka o čuvanju dokumenata i njihovoj bezbjednosti; | sekretar | kontinuirano |

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| nastavnik |
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| Pravilno vođenje evidencije o učenicima | sekretar | kontinuirano |  |
| nastavnik |  |
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| 4.5 | Čuvanje i bezbjednost podataka i dokumenata |

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| --- |
| nastavnik |

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| Zloupotreba službenih podataka i informacija |

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| Zakoni i podzakonska akta |
| Interna pravila i procedure |
| Edukacija |

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| Pristup poadacima od strane neovlašćenih lica |

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| Pravilno vođenje evidencije o učenicima i pedagoške dokumentacije | nastavnik | kontinuirano |

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| Jačanje transparentnosti, | nastavnik | kontinuirano |  |
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| 5.1 | Vannastavne aktivnosti |

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| direktor |
| nastavnik |

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| Neetično i neprofesionalno ponašanje zaposlenih |

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| Interna akta institucije |
| Etički kodeks |
| Savjet roditelja |

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| Neprofesionalno ponašanje u organizaciji izleta, takmičenja, kao I neracionalno trošenje finansijskih sredstava |

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| Detaljno isplanirati vannastavne aktivnosti | direktor | kontinuirano |

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| nastavnik |  |
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| Omogućiti roditeljima učenika uvid u način organizacije izleta, plan putovanja na takmičenja i trošenja novčanih sredstava | direktor | polugodišnje |  |
| nastavnik |
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| 5.1 | Vannastavne aktivnosti |

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| direktor |
| nastavnik |

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| Neetično i neprofesionalno ponašanje zaposlenih |

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| Interna akta institucije |
| Etički kodeks |
| Savjet roditelja |

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| Neprofesionalno ponašanje u organizaciji izleta, takmičenja, kao I neracionalno trošenje finansijskih sredstava |

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| Obezbijediti uslove za fizičko obezbjeđenje imovine. | direktor | kontinuirano |

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| 6.1 | Odnos sa javnošću |

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| direktor |
| nastavnik |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |

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| Zakoni i podzakonska akta |

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| Nedovoljna informisanost javnosti o radu ustanove |

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| Odrediti službenika za odnose sa javnošću  | direktor | kontinuirano |

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| nastavnik |  |
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| Prezentovati uspjeh škole u medijima i na društvenim mrežama | direktor | kvartalno |  |
| pomoćnik direktora |
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| nastavnik |  |
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| Redovno ažurirati sajt škole | ICT kordinator | kontinuirano |  |
| nastavnik |
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| 6.2 | Odnos sa javnošću |

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| direktor |

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| Narušavanje integriteta institucije |

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| Zakoni i podzakonska akta |

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| Nedovoljna informisanost javnosti o radu ustanove |

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| Odrediti službenika za odnose sa javnošću  | direktor | kontinuirano |

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| Redovno ažurirati sajt škole | nastavnik | kontinuirano |  |
| ICT kordinator |
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| direktor |  |
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| Prezentovati uspjeh škole u medijima i na društvenim mrežama | direktor |  |  |
| pomoćnik direktora |
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| 6.3 | Odnos sa javnošću |

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| direktor |
| nastavnik |

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| Gubitak povjerenja roditelja I građana u rad zaposlenih I kvalitet rada ustanove  |

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| Zakoni i podzakonska akta |

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| Nedovoljna informisanost javnosti o radu ustanove |

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| Odrediti službenika za odnose sa javnošću  |  |  |

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| Prezentovati uspjeh škole u medijima i na društvenim mrežama | direktor | kvartalno |  |
| nastavnik |
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