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|  |  Plan integriteta 2022 |  |
|  |  JU Srednja mješovita škola „Vuksan Đukić“ Mojkovac |  |
|  | 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 |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |
| Donošenje nezakonitih odluka |

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| Zakoni i podzakonska akta |

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| 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 institucije  | direktor | Kontinuirano |

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| Razmotriti usvajanje procedura o diskrecionom odlučivanju  | direktor | Kontinuirano |  |
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| 1.2 | Rukovođenje i upravljanje |

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| direktor |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |

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| Zakon o sprječavanju korupcije |
| Interna akta institucije |

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| Primanje sponzorstava i donacija suprotno odredbama Zakona o sprječavanju korupcijeNepoštovanje zakonske obaveze evidentiranja primljenih sponzorstava i donacija i njihove vrijednostiNedostavljanje Agenciji za sprječavanje korupcije pisanog izvještaja o primljenim sponzorstvima i donacijama |

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| Vršiti redovnu kontrolu evidencije o primljenim sponzorstavima i donacijama | direktor | Kontinuirano |

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| Dostaviti Agenciji za sprječavanje korupcije do kraja marta tekuće godine za prethodnu godinu pisani izvještaj o primljenim sponzorstvima i donacijama sa kopijom dokumentacije u vezi sa tim sponzorstvima ili donacijama, na propisanom obrascu  | direktor | Kontinuirano |  |
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| 1.2 | Rukovođenje i upravljanje |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |

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| Zakon o sprječavanju korupcije |
| Interna akta institucije |

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| Primanje sponzorstava i donacija suprotno odredbama Zakona o sprječavanju korupcijeNepoštovanje zakonske obaveze evidentiranja primljenih sponzorstava i donacija i njihove vrijednostiNedostavljanje Agenciji za sprječavanje korupcije pisanog izvještaja o primljenim sponzorstvima i donacijama |

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| 1.3 | Rukovođenje i upravljanje |

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| Narušavanje integriteta institucije |
| Narušavanje integriteta zaposlenih |

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| Interna akta institucije |
| Zakoni i podzakonska akta |

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| Neadekvatno sprovođenje nadzora i kontrole nad radom organizacionih jedinica / organa  |

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| Redovno izvještavanje o sprovedenim kontrolama | direktor | Kontinuirano |

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| Praćenje realizacije preporuka za unapređenje rada  | direktor | Kontinuirano |  |
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| 1.4 | Rukovođenje i upravljanje |

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| direktor |

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| Nepostojanje jasne strategije upravljanja, misije i vizije |

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| Zakoni i podzakonska akta |
| Interna akta institucije |

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| Neadekvatno kreiranje politike razvoja i upravljanja (utvrđivanje misije, vizije, strategija i planova) |

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| Osigurati učešće svih relevantnih subjekata i jedinica prilikom kreiranja politike razvoja i upravljanja | direktor | Kontinuirano |

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| Napraviti model za procjenu i uspješnosti organizacije | direktor | Kontinuirano |  |
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| Razmotriti preporuke relevantnih subjekata koje se odnose na razvoj institucije | direktor | Kontinuirano |  |
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| 1.5 | Rukovođenje i upravljanje |

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| Neadekvatno strateško planiranje rada institucije |

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| Zakoni i podzakonska akta |
| Podjela radnih zadataka |

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| Odstupanja u sprovođenju strategije razvoja institucije, programa i planova rada |

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| Redovno u toku godine izvještavati o sprovođenju strateških dokumenata, planova i programa | direktor | Kontinuirano |

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| 1.6 | Rukovođenje i upravljanje |

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| direktor |

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| Narušavanje integriteta institucije |
| Narušavanje principa transparentnosti |

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| Interna akta institucije |
| Zakoni i podzakonska akta |

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| Negativna ocjena javnog mnjenja i gubitak povjerenja javnosti u rad institucije zbog nedovoljne transparentnosti i informisanja javnosti o radu institucije |

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| Proaktivno objavljivati informacije iz člana 12 Zakona o slobodnom pristupu informacijama i druge informacije od javnog interesa uz odgovarajući način zaštite ličnih podataka koji su od značaja za privatnost i podataka koji su označeni stepenom tajnosti, u skladu sa zakonom. | direktor | Kontinuirano |

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| Omogućiti dostupnost i preglednost relevantnih dokumenata na internet stranici | direktor | Kontinuirano |  |
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| 1.7 | 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 |
| Podjela radnih zadataka |

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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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| Puna transparentnost u procedurama odlučivanja u oblastima iz nadležnosti sekretara;  | sekretar | Kontinuirano |

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| 2.1 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| javni funkcioneri (imenovani i zaposleni u instituciji) |

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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 sprječavanju korupcijeNepoštovanje zakonske obaveze evidentiranja primljenih poklona i njihove vrijednostiNedostavljanje Agenciji za sprječavanje korupcije izvoda iz evidencije poklona  |

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| Odrediti lice koje je zaduženo za evidenciju poklona javnih funkcionera | direktor | kontinuirano |

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| Vršiti redovnu kontrolu evidencije o primljenim poklonima | direktor | Kontinuirano |  |
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| 2.1 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| --- |
| javni funkcioneri (imenovani i zaposleni u instituciji) |

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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 sprječavanju korupcijeNepoštovanje zakonske obaveze evidentiranja primljenih poklona i njihove vrijednostiNedostavljanje Agenciji za sprječavanje korupcije izvoda iz evidencije poklona  |

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| Dostaviti Agenciji za sprječavanje korupcije izvod iz evidencije poklona na propisanom obrascu, do kraja marta tekuće godine za prethodnu godinu | direktor | Kontinuirano |  |
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| 2.2 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| javni funkcioneri (imenovani i zaposleni u instituciji) |

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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 |

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| Redovno dostavljati izvještaje o imovini i prihodima javnih funkcionera | javni funkcioneri (imenovani i zaposleni u instituciji) | Kontinuirano |

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| 2.3 | 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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| Zakoni i podzakonska akta |

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| Primanje poklona suprotno odredbama zakonaNedovoljna informisanost zaposlenih o obavezi prijavljivanja poklona  |

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| Donijeti i objaviti obavještenje kojim će se svi zaposleni upoznati o obavezi prijavljivanja svih poklona a neposredni rukovodioci obavezati da ažurno vode evidenciju o primljenim poklonima i izvještavaju nadležnu službu | direktor | Kontinuirano |

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| Donijeti interno uputstvo o vođenju evidencije primljenih poklona zaposlenih | direktor | Kontinuirano |  |
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| 2.4 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |
| Sukob interesa |

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

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| Veliki i/ili nekontrolisan prostor donošenja diskrecionih odluka prilikom donošenja prerasporednih rješenja, odluka o varijabilnom dijelu zarade i drugih odluka od značaja za rad edukaciju, usavršavanje i materijalni status  |

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| Objavljivanje svih odluka od značaja za rad, edukaciju, usavršavanje i materijalni status zaposlenih na oglasnoj tabli institucije zbog povećanja transparentnosti | direktor Službe za zajedničke poslove | Kontinuirano |

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

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |
| Sukob interesa |

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

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

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| Neprijavljivanje korupcije i drugih nezakonitih radnji |

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| Obuke i seminari |
| Etički kodeks |

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| Nedovoljan razvijen nivo svijesti zaposlenih za prijavljivanje korupcije i drugih nezakonitih radnji unutar institucije |

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| Edukacija zaposlenih o mehanizmima prijavljivanja korupcije i drugih nezakonitih radnji unutar institucije  | direktor | Kontinuirano |

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| Uvesti edukaciju  | direktor | Kontinuirano |  |
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| 2.6 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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

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| Neprijavljivanje korupcije i drugih nezakonitih radnji |
| Ugrožavanje zaštite podataka |

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| Zakon o sprječavanju korupcije |
| Zakon o tajnosti podataka |
| Zakon o zaštiti diskriminacije na radnom mjestu |
| Zakon o zabrani zlostavljanja na radu |

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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 zviždača | direktor | Kontinuirano |

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| Obezbijediti zaštitu zviždača od svih oblika diskriminacije i ograničenja i uskraćivanja prava zviždača | direktor | Kontinuirano |  |
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| Donijeti interno uputstvo za evidenciju prijava korupcije unutar institucije i postupanje po prijavama, kao i zaštitu identiteta lica koje je podnijelo prijavu | direktor | Kontinuirano |  |
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| 2.6 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| odgovorno lice za prijem i postupanje po prijavi zviždača |

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| Neprijavljivanje korupcije i drugih nezakonitih radnji |
| Ugrožavanje zaštite podataka |

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| Zakon o sprječavanju korupcije |
| Zakon o tajnosti podataka |
| Zakon o zaštiti diskriminacije na radnom mjestu |
| Zakon o zabrani zlostavljanja na radu |

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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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| Obavještavati zviždače o mjerama koje su preduzete po njihovoj prijavi | direktor |  |

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

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| Nestručan i neprofesionalan rad |

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| Interna akta institucije |
| Zakoni i podzakonska akta |

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| Određen broj zaposlenih nema položen poseban stručni ispit |

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| Naložiti svim zaposlenima da obezbjede puno sprovođenje obaveze o opštem i posebnom programu obuka za sve zaposlene u predvidjenom roku  | direktor | Kontinuirano |

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| 2.8 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| Neefikasna i neracionalna kadrovska politika |

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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 institucije | direktor | Kontinuirano |

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| Popuniti upražnjena radna mjesta u skladu sa Pravilnikom o sistematizaciji i organizaciji radnih mjesta | direktor | Kontinuirano |  |
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| 2.9 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |
| svi zaposleni |

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| Sukob interesa |

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| Etički kodeks |
| Zakoni i podzakonska akta |

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

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| Donijeti interno uputstvo za kontrolu i evidenciju postojanja sukoba interesa i periodična kontrola zahtjeva za izuzeće  | direktor | Kontinuirano |

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

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| Povrede profesionalnih, etičkih pravila i pristrasno ponašanje |

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| Plan i program obuka |
| Interna akta institucije |

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| Nedostatak stručnog znanja i vještina kadra |

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| Obezbijediti redovno sprovođenje plana i programa stručnog usavršavanja | direktor | Kontinuirano |

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

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| direktor |

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| Narušavanje integriteta institucije |

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| Plan i program obuka |
| Interna akta institucije |

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| Nedostatak stručnog znanja i vještina kadra |

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| Sprovoditi obuke zaposlenih o etici i integriteta | direktor | Kontinuirano |  |
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| 2.11 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |

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| Narušavanje principa transparentnosti |

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| Etički kodeks |
| Mogućnost ulaganja žalbi |
| Obuke i seminari |
| Pojačan stručni nadzor |

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| Ne postoje jasni kriterijumi za objektivnu ocjenu rada i nagrađivanja službenika  |

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| Povećanje transparentnosti prilikom ocjenjivanja i nagrađivanja zaposlenih na način što će se rezultati ocjenjivanja i spisak nagrađenih zaposlenih javno objavljivati na oglasnoj tabli  | direktor | Kontinuirano |

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| 3.1 | Planiranje i upravljanje finansijama |

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| direktor |
| računovođa |

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| Neadekvatno planiranje i izvršavanje budžeta |

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| Edukacija |

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| Neadekvatno planiranje budžeta |

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| Osigurati učešće svih relevantnih subjekata i jedinica prilikom planiranja budžeta | računovođa | Kontinuirano |

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| Pohađati relevantne obuke i seminare na temu planiranja budžeta | računovođa | Kontinuirano |  |
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| 3.2 | Planiranje i upravljanje finansijama |

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| direktor |
| računovođa |

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| Neadekvatno planiranje i izvršavanje budžeta |

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| Zakoni i podzakonska akta |
| Izvještaj o radu |

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| Neadekvatno i nedovoljno transparentno trošenje budžetskih sredstava |

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| Redovno sprovođenje unutrašnjih finansijskih kontrola | direktor | Kontinuirano |

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| Postupati po preporukama iz izvještaja o izvršenoj reviziji | direktor | Kontinuirano |  |
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| 3.2 | Planiranje i upravljanje finansijama |

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| Neadekvatno planiranje i izvršavanje budžeta |

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| Zakoni i podzakonska akta |
| Izvještaj o radu |

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| Neadekvatno i nedovoljno transparentno trošenje budžetskih sredstava |

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| 3.3 | Planiranje i upravljanje finansijama |

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| direktor |
| službenik za javne nabavke |

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

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| Zakoni 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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| Kvartalno izvještavanje rukovodstva o realizaciji javnih nabavki | direktor | Kontinuirano |

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| službenik za javne nabavke |
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| 3.4 | Planiranje i upravljanje finansijama |

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| direktor |
| službenik za javne nabavke |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |
| Narušavanje principa transparentnosti |

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| Zakoni i podzakonska akta |
| Portal javnih nabavki |

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| Nedovoljna transparentnost javnih nabavki |

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| Objavljivati ugovore i sve anekse ugovora na internet stranici | direktor | Kontinuirano |

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| Objavljivati pozive za učešće u postupcima javnih nabavki i druge dokumente | službenik za javne nabavke | Kontinuirano |  |
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| 3.5 | Planiranje i upravljanje finansijama |

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| službenik za javne nabavke |
| članovi komisije za otvaranje i vrednovanje ponuda |

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| Donošenje nezakonitih odluka |
| Iskorišćavanje javne funkcije ili službenog položaja |
| Sukob interesa |
| Nepravilnosti i narušavanje integriteta u postupcima javnih nabavki |

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| Zakoni i podzakonska akta |
| Mogućnost ulaganja žalbi |
| Obaveza sastavljanja izvještaja |
| Verifikacija od strane kolega |

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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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| Unijeti antikorupcijsku klauzulu u sve ugovore o javnim nabavkama  | direktor | Kontinuirano |

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| Provjera izjava o nepostojanju sukoba interesa članova tenderskih komisija i službenika za javne nabavke i obrazaca za imovinu | direktor | Kontinuirano |  |
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| 4.1 | Čuvanje i bezbjednost podataka i dokumenata |

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| direktor |
| rukovodilac IT službe |

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| Curenje informacija |
| Iskorišćavanje javne funkcije ili službenog položaja |
| Ugrožavanje zaštite podataka |

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| Interna akta institucije |
| Pojačan stručni nadzor |

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

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| Razmotriti mogućnost uvođenja posebnog IT sistema po principu Data Menagament za elektronsku bazu podataka – dokumenata u posjedu institucije (opciono) | direktor | Kontinuirano |

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| 4.1 | Čuvanje i bezbjednost podataka i dokumenata |

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| direktor |
| rukovodilac IT službe |

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| Curenje informacija |
| Iskorišćavanje javne funkcije ili službenog položaja |
| Ugrožavanje zaštite podataka |

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| Interna akta institucije |
| Pojačan stručni nadzor |

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

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| Obučiti zaposlene o bezbjednom rukovanju podacima u elektronskoj formi | rukovodilac IT službe | Kontinuirano |  |
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| 4.2 | Čuvanje i bezbjednost podataka i dokumenata |

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| sekretar |

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| Curenje informacija |
| Nesavjestan rad |
| Ugrožavanje zaštite podataka |

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| Pojačan stručni nadzor |

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

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| Izvršiti analizu da li su mjere fizičke i tehničke bezbjednosti efikasne i primjenjive  | sekretar | Kontinuirano |

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| Obezbijediti uslove za fizičko obezbjeđenje imovine | sekretar | Kontinuirano |  |
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| 4.3 | Čuvanje i bezbjednost podataka i dokumenata |

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| sekretar |

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| Curenje informacija |
| Odavanje tajnih podataka |
| Zloupotreba povjerljivih službenih podataka i informacija o korisnicima usluga / strankama |

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| Zakoni i podzakonska akta |

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| Nedovoljna zaštita povjerljivih podataka zbog neadekvatnih mjera administrativne zaštite tajnih podataka |

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| Donijeti odluke kojima će se označiti stepen tajnosti podataka koji su u posjedu institucije | rukovodilac institucije | Kontinuirano |

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| 4.4 | Čuvanje i bezbjednost podataka i dokumenata |

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| --- |
| sekretar |

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| Curenje informacija |
| Nesavjestan rad |

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| Edukacija |
| Interna akta institucije |
| Podzakonska akta |

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

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| Vršiti redovne kontrole nad prijemom i razvrstavanjem dokumentacije u cilju sprečavanja gubljenja, oštećenja ili neevidentiranja dokumentacije | sekretar | kontinuirano |

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| 5.1 | Vanredna polaganja |

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| Profesori |

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| Povrede profesionalnih, etičkih pravila i pristrasno ponašanje |

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| --- |
| Podjela radnih zadataka |
| Pojačan stručni nadzor |

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| Nedostatak procedura o radu (nepostojanje smjernica, pravilnika, uputstava); |

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| Donijeti interno uputstvo o kontroli i procedureo radu. Kontrola pripremne nastave  | direktor | Kontinuirano |

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| 5.1 | Vanredna polaganja |

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| Profesori |

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| --- |
| Povrede profesionalnih, etičkih pravila i pristrasno ponašanje |

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| Podjela radnih zadataka |
| Pojačan stručni nadzor |

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| Nedostatak procedura o radu (nepostojanje smjernica, pravilnika, uputstava); |

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| Praćenje sprovođenja od strane direktora | direktor | Kontinuirano |  |
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| 6.1 | Odnosi sa javnošću |

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| direktor |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |
| Narušavanje principa transparentnosti |
| Narušavanje integriteta institucije |

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| Zakoni i podzakonska akta |
| Princip četiri oka |

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| Nedovoljna informisanost javnosti o radu škole |

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| Odrediti službenika zaduženog za odnose sa javnošću | direktor | Kontinuirano |

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| Povećati broj informacija o radu institucije po sopstvenoj inicijativi i na zahtjev medija i javnosti | direktor | Kontinuirano |  |
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| Unaprijediti kvalitet i kvantitet informacija na web stranici institucije | rukovodilac IT službe | Kontinuirano |  |
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| 7.1 | Slobodan pristup informacijama |

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| službenik za slobodan pristup informacijama |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |

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| Zakon o slobodnom pristupu informacijama |

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| Neobjavljivanje dokumenata shodno Zakono o slobodnom pristupu informacijama, kao i ostalih informacija od značaja za građane |

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| Objaviti Vodič za slobodan pristup informacijama na internet stranici institucije | direktor | Kontinuirano |

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| Redovno objavljivati i ažurirati propise koji regulišu rad ustanove na internet stranici, u skladu sa članom 12 ZSPI | sekretar | Kontinuirano |  |
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| 7.2 | Slobodan pristup informacijama |

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| službenik za slobodan pristup informacijama |

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| Donošenje nezakonitih odluka |
| Narušavanje integriteta institucije |

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| Zakon o slobodnom pristupu informacijama |
| Vodič za slobodan pristup informacijama |

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| Neosnovano uskraćivanje podnosiocu zahtjeva pristup informaciji, neobavještavanje podnosioca zahtjeva o rješavanju zahtjeva |

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| Izvještavati o broju podnijetih i riješenih zahtjeva | direktor | Kontinuirano |

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