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|  |  Izvještaj o sprovođenju plana integriteta za 2022. godinu |  |
|  |  „Sportski centar“ DOO Rožaje |  |
|  | 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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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |
| Donošenje nezakonitih odluka |

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| Zakoni i podzakonska akta |
| Interna akta institucije |

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| Donošenje odluka pod eksternim uticajem, suprotno javnom interesu zbog nepostojanja jasnih propisa za korišćenje, diskrecionih ovlašćenja |

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| Poštovanje principa transparentnosti prilikom donošenja odluka iz nadležnosti preduzeća; | direktor | Kontinuirano |

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 | RealizovanoPoštovani su principi transparentnosti prilikom donošenja odluka iz nadležnosti preduzeća. |
| rukovodioci |
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| Utvrđivanje jasnih pravila o korišćenju diskrecionih ovlašćenja  | direktor | Kontinuirano | Realizovano Jasno smo utvrdili pravila o korišćenju diskrecionih ovlašćenja. |
| rukovodioci |
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| 1.2 | Rukovođenje i upravljanje |

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| Narušavanje integriteta institucije |

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| Zakoni i podzakonska akta |
| Interna akta institucije |

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

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| Proaktivno objavljivati informacije iz člana 12 Zakona o slobodnom pristupu informacijama, kao i druge informacije od javnog interesa  | direktor | Kontinuirano |

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 | RealizovanoProaktivno objavljujemo informacije iz člana o slobodnom pristupu informacijama, kao i druge informacije od javnog interesa. |
| rukovodioci |
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| 1.2 | Rukovođenje i upravljanje |

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| Zakoni i podzakonska akta |
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| Negativna ocjena javnog mnjenja i gubitak povjerenja javnosti u rad preduzeća zbog nedovoljne transparentnosti i informisanja javnosti o njenom radu |

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| Obezbijediti kontinuiranu i kvalitetnu informisanost stručne i šire javnost o radu i uslugama preduzeća.  | direktor | Kontinuirano |

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 | RealizovanoObezbijedili smo kontinuiranu i kvalitetnu informisanost stručne i šire javnost o radu i uslugama preduzeća,preko našeg sajta i facebook stranice. |
| rukovodioci |
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| 1.3 | Rukovođenje i upravljanje |

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| Povrede profesionalnih, etičkih pravila i pristrasno ponašanje |

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| Podzakonska akta |

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| Povreda zakonitosti pri donošenju odluka |

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| Utvrđivanje jasnih pravila o korišćenju diskrecionih ovlašćenja  | direktor | kontinuirano |

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 | RealizovanoUtvrdili smo jasna pravila o korišćenju diskrecionih ovlašćenja. |
| rukovodioci |
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| 1.4 | Rukovođenje i upravljanje |

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| direktor |

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| Narušavanje principa transparentnosti |

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| Mogućnost ulaganja žalbi |

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| Nedovoljna trasnparentnost rada preduzeća i informisanost usljed neažuriranja internet stranice preduzeća |

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| Unaprijediti dostupnost i preglednost relevantnih dokumenata i informacija na internet stranic(Statut, Odluke, itd) | direktor | kontinuirano |

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 | Realizovano Redovno unapređujemo dostupnost i preglednost relevantnih dokumenata i informacija na internet stranici. |
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| Unaprijediti i redovno ažurirati web stranicu preduzeća i dostupnost relevantnih podataka | direktor | kontinuirano | RealizovanoUnaprijeđujemo i redovno ažuriramo web stranicu preduzeća i dostupni su svi relevantni podaci. |
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| 1.5 | Rukovođenje i upravljanje |

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| direktor |
| rukovodioci |

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| Neadekvatno strateško planiranje rada institucije |

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| Zakoni i podzakonska akta |

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| Odstupanja u sprovođenju strateških dokumenata, planova i programaNedovoljna i nekoordinisana saradnja između različitih radnih jedinica |

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| Redovno u toku godine izvještavati o sprovođenju planova i programa | direktor | kontinuirano |

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 | RealizovanoRedovno u toku godine izvještavamo o sprovođenju planova i programa |
| rukovodioci |
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| Redovno praćenje i ocjena efekata primjene strategija, akcionih planova, zakona | direktor | kontinuirano | RealizovanoRedovno pratimo i ocjenjujemo efekate primjene strategija, akcionih planova, zakona |
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| 1.6 | Rukovođenje i upravljanje |

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| Donošenje nezakonitih odluka |

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| Izvještaj o radu |

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| Neadekvatno praćenje relevantnih propisa |

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| Odrediti lice zaduženo za praćenje propisa | direktor | kontinuirano |

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 | RealizovanoOdređeno je lice zaduženo za praćenje propisa. |
| menadžer integriteta |
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| 2.1 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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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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 | RealizovanoOdređeno je lice koje je zaduženo za evidenciju poklona javnih funkcionera |
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| Vršiti redovnu kontrolu evidencije o primljenim poklonimaDonijeti interno uputstvo o vođenju evidencije primljenih poklona | direktor | Kontinuirano | RealizovanoVršimo redovnu kontrolu evidencije o primljenim poklonima i donijeli smo  |
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| 2.1 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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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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 | interno uputstvo o vođenju evidencije primljenih 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 (član 19 ZSK) | direktor | kontinuirano | RealizovanoDostavili smo Agenciji za sprječavanje korupcije izvod iz evidencije poklona na propisanom obrascu, |
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| 2.2 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |
| rukovodilac sektora |

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| Neprijavljivanje korupcije i drugih nezakonitih radnji |

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| Obuke i seminari |

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

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| Edukacija zaposlenih o mehanizmima prijavljivanja korupcije i drugih nezakonitih radnji unutar preduzeća | direktor | kontinuirano |

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 | RealizovanoEdukovani su zaposlenih o mehanizmima prijavljivanja korupcije i drugih nezakonitih radnji unutar preduzeća |
| rukovodilac sektora |
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| Uvesti edukaciju prema ciljnim grupama posebno prema zaposlenima koji pokrivaju rizične grupe poslova i uvesti obavezu da se na svim kolegijumima raspravlja i o temi integriteta i prevencije korupcije kao jednoj od obaveznih tačaka dnevnog reda | direktor | kontinuirano | RealizovanoNa svim kolegijumima se raspravlja o temi integriteta i prevencije korupcije kao jednoj od obaveznih tačaka dnevnog reda. Uvedena je edukacija prema ciljnim grupama. |
| rukovodilac sektora |
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| 2.2 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |
| rukovodilac sektora |

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| Neprijavljivanje korupcije i drugih nezakonitih radnji |

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| Obuke i seminari |

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

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

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| Nesavjestan rad |

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| Interna pravila i procedure |

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| Nedostatak stručnog znanja i vještina kadra |

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| Obezbijediti stručnim radnicima i saradnicima stručno usavršavanje | direktor | kontinuirano |

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 | RealizovanoObezbijđeno je stručnim radnicima i saradnicima stručno usavršavanje. |
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| Sprovoditi obuke zaposlenih o etici i integritetu | direktor | kontinuirano | RealizovanoSprovode se obuke zaposlenih o etici i integritetu. |
| rukovodilac sektora |
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| 3.1 | 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 |

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| Zakoni i podzakonska akta |
| Izvještaj o radu |
| 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 (član 15 ZJN) | direktor | kontinuirano |

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 | RealizovanoUnijeta je antikorupcijska klauzulua u sve ugovore o javnim nabavkama. |
| službenik za javne nabavke |
| članovi komisije za otvaranje i vrednovanje ponuda |
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| Provjera izjava o nepostojanju sukoba interesa članova tenderskih komisija i službenika za javne nabavke i obrazaca za imovinu | direktor | kontinuirano | RealizovanoProvjerene su izjavae o postojanju sukoba interesa članova tenderskih komisija i službenika za javne nabavke i obrazaca za imovinu |
| službenik za javne nabavke |
| članovi komisije za otvaranje i vrednovanje ponuda |
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| 3.2 | Planiranje i upravljanje finansijama |

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| direktor |
| rukovodilac finansijske službe |

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| Neadekvatno planiranje i izvršavanje budžeta |

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| Zakoni i podzakonska akta |

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| Neadekvatno planiranje budžeta |

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

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 | RealizovanoOsigurano je učešće svih relevantnih subjekata i jedinica prilikom planiranja budžeta. |
| rukovodilac finansijske službe |
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| Pohađati relevantne obuke i seminare na temu planiranja budžeta | direktor | kontinuirano | RealizovanoPohađaju se relevantne obuke i seminare na temu planiranja budžeta |
| rukovodilac finansijske službe |
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| 3.3 | Planiranje i upravljanje finansijama |

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| direktor |
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| Neadekvatno planiranje i izvršavanje budžeta |

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| Podzakonska akta |

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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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 | RealizovanoRedovno se sprovođe unutrašnje finansijske kontrole. |
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| Postupati po preporukama iz izvještaja o izvršenoj reviziji | direktor | kontinuirano | RealizovanoPostupa se po preporukama iz izvještaja o izvršenoj reviziji |
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| 3.4 | Planiranje i upravljanje finansijama |

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| direktor |
| službenik za javne nabavke |

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| Neadekvatno sprovođenje postupaka javnih nabavki |

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| Zakoni i podzakonska akta |
| Izvještaj o radu |
| Ugovor o javnoj nabavci |

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| Odstupanje od realizacije aktivnosti predviđenih ugovorima o javnoj nabavci |

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| Godišnje izvještavanje rukovodstva o realizaciji ugoovra o javnim nabavkama  | direktor | kontinuirano |

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 | RealizovanoGodišnje se izvještava rukovodstvo o realizaciji ugoovra o javnim nabavkama |
| službenik za javne nabavke |
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| 3.4 | Planiranje i upravljanje finansijama |

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| Neadekvatno sprovođenje postupaka javnih nabavki |

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| Zakoni i podzakonska akta |
| Izvještaj o radu |
| Ugovor o javnoj nabavci |

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| Odstupanje od realizacije aktivnosti predviđenih ugovorima o javnoj nabavci |

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| 3.5 | Planiranje i upravljanje finansijama |

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| direktor |
| službenik za javne nabavke |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |

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| Zakon o javnim nabavkama |

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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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 | RealizovanoObjavljiuju se ugovori i aneksi ugovora na internet stranici. |
| službenik za javne nabavke |
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| Objavljivati pozive za učešće u postupcima javnih nabavki i druge dokumente | direktor | kontinuirano | RealizovanoObjavljuju se pozivi za učešće u postupcima javnih nabavki. |
| službenik za javne nabavke |
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| 3.6 | Planiranje i upravljanje finansijama |

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| rukovodilac službe opštih poslova |

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| Iskorišćavanje javne funkcije ili službenog položaja |

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| Interna akta institucije |

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| Nije obezbijeđen adekvatan sistem kontrole nad korišćenjem službenih vozila |

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| Donijeti interni procedure o koriscenju sluzbenih vozila | direktor | kontinuirano |

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 | RealizovanoNemamo službeno vozilo. |
| rukovodilac službe opštih poslova |
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| Sprovoditi redovne kontrole | direktor | kontinuirano | RealizovanoSprovode se redovne kontrole |
| rukovodilac službe opštih poslova |
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| 4.1 | Čuvanje i bezbjednost podataka i dokumenata |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |

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| Zakon o tajnosti podataka |

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| Neobjavljivanje dokumenata shodno Zakono o tajnosti podataka.  |

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| Redovno objavljivati i ažurirati propise koji regulišu rad preduzeća na internet stranici, u skladu sa zakonom o tajnosti podataka. | direktor | kontinuirano |

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 | RealizovanoRedovno se objavljuju dokumenta na internet stranici, u skladu sa zakonom o tajnosti podataka. |
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| 4.1 | Čuvanje i bezbjednost podataka i dokumenata |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |

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| Zakon o tajnosti podataka |

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| Neobjavljivanje dokumenata shodno Zakono o tajnosti podataka.  |

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