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|  |  Izvještaj o sprovođenju plana integriteta za 2022. godinu |  |
|  |  Lokalni javni emiter „Radio televizija Budva“ |  |
|  | 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 |
| Savjet RTB |
| Glavni urednici |

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

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| Zakoni i podzakonska akta |
| Interna akta 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 akata | direktor | kontinuirano  |

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 | RealizovanoU izvještajnom roku sve propisane odluke i akti su doneseni transparentno. |
| Savjet RTB |
| Glavni urednici |
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| Vršenje redovne kontrole u procesu odluičivanja i usaglašenosti odluka sa zakonom | direktor | kontinuirano | RealizovanoU datom izvještajnom roku svi propisi i akti su doneseni transparentno. |
| Savjet RTB |
| Glavni urednici |
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| 1.2 | Rukovođenje i upravljanje |

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| direktor |
| Savjet RTB |
| Glavni urednici |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |

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| Zakon o sprječavanju korupcije |

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

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| Vršenje kontrole evidencije o primljenim sponzorstvima i donacijama. | direktor | kontinuirano |

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 | RealizovanoU izvještajnom roku dostavljena dokumentacija. |
| Savjet RTB |
| Glavni urednici |
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| 1.2 | Rukovođenje i upravljanje |

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| direktor |
| Savjet RTB |
| Glavni urednici |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |

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| Zakon o sprječavanju korupcije |

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| donacijama |

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| Dostaviti Agenciji za sprječavanje korupcije do kraja marta tekuće godine za prethodnu godinu izvještaj o primljenim sponzorstvima i dinacijama sa kopijom dokumentacije u vezi sa tim sponzorstvima ili donacijama na propisanom obrazcu | direktor |  |

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 | RealizovanoDostavljen je izvjaeštaj Agenciji za sprečavanje korupcije u odgovarajućem terminu. |
| Savjet RTB |  |
| Glavni urednici |  |
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| 1.3 | Rukovođenje i upravljanje |

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| direktor |
| Savjet RTB |

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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 institucije, programa i planova rada |

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| Izvještavanje o sprovođenju strategije razvoja, o mjerama za unaprjeđenja i poboljšanja rada ustanove, planu razvoja ustanove. | Savjet RTB | kontinuirano |

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 | RealizovanoRedovno izvještavano o sprovođenju strategije razvoja firme. |
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| 2.1 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |
| Savjet RTB |

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| Nezakonit proces planiranja i sprovođenja procedure zapošljavanja |

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| Zakoni i pravilnici |

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| Zapošljavanje bez javnog oglašavanja suprotno zakonu i pravilnku o oragnizaciji i sistematizaciji radnih mjesta |

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| Kontrola procesa zapošljavanja zaposlenih u instituciji. | direktor | kontionuirano |

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 | RealizovanoU izvještajnom periodu vršena je kontrola zapošljavanja u firmi. |
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| 2.2 | 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 pokolona suprotno odredbama zakona |

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| Donijeti i objaviti obavješenje kojim će se svi zaposleni upoznati o obavezama prijavljivanja svih poklona. | svi zaposleni | kontinuirano |

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 | RealizovanoU izvještajnom roku donijeto obavještenje. |
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| Donijeti interno uputstvo o vođenju evidencije primljenih poklona zaposlenih. | svi zaposleni | kontinuirano | RealizovanoDonijeto interno upustvo o vođenju evidenicije. |
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| 2.2 | 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 pokolona suprotno odredbama zakona |

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

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| direktor |
| svi zaposleni |

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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 o radu institucije |

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| Proaktivno objavljivanje informacija iz člana 12 Zakona o slobodnom pristupu informacija 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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 | RealizovanoU izvještajnom roku proaktivno objavljene informacije o slobodnom pristupu iinformacija uz odgovarajući nčin zaštite ličnih podataka. |
| svi zaposleni |
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| Omogućiti dostupnost relevantnih dokumenata na web stranici, na facebook-u, na oglasnoj tabli i sl. | direktor | kontunirano | RealizovanoU izvještajnom roku omogućen pristup relavantnim domumentima na web stranici. |
| svi zaposleni |
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| 3.1 | 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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| Zakon o javnim nabavkama |
| Zakon o budžetu |
| Zakon o zaradama zaposlenih u javnom sektoru  |

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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 godine. | službenik za javne nabavke | kontinuirano |

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 | RealizovanoU izvještajnom periodu donesesn je plan javnih nabavki. |
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| Podnošenje izvještaja o sprovedenim postupcima javnih nabavki na godišnjem nivou | službenik za javne nabavke | kontinuirano | RealizovanoU izvještajnom roku podnesen je izvještaj o  |
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| 3.1 | 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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| Zakon o javnim nabavkama |
| Zakon o budžetu |
| Zakon o zaradama zaposlenih u javnom sektoru  |

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

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 | sprovedenim postupcima javnih nabavki. |
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| 3.2 | Planiranje i upravljanje finansijama |

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| računovođa |

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| Nepodnošenje kvartalnih finansijskih izvještaja |

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| 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. | rukovodilac finansijsko računovodstvenih poslova | kontinuirano |

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 | RealizovanoKontinuirano je vršeno dostavljanje kvartnih finansijskih izvještaja o raspolaganju budžetskim sredstvima. |
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| 4.1 | Čuvanje i bezbjednost podataka i dokumenata |

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| direktor |
| rukovodilac pravne službe |

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| Ugrožavanje bezbjednosti službenih podataka i dokumenata |
| Nesavjestan rad |

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

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| Neadekvatna evidencija i čuvanje službenih podataka i dokumenata.Nesavjestan i nestručan rad.. |

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| Redovna kontrola podataka i kreiranje backup-a istih. | rukovodilac pravne službe | kontinuirano |

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 | Djelimično realizovanoU izvještajnom periodu vršena kontrola podataka. |
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| Pojačan nadzor i stručna pomoć zaposlenom osoblju. | rukovodilac pravne službe | kontinuirano | RealizovanoU izvještajnom periodu pružana je strušn apomoć zaposlenima. |
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| 5.1 | Dostavljanje predloga zakona i drugih akata Vladi |

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| Samostalni i viši savjetnici u svim sektorima |

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| --- |
| Povrede profesionalnih, etičkih pravila i pristrasno ponašanje |
| Nedozvoljeno lobiranje ili drugi nejavni uticaj |
| Narušavanje  |

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| --- |
| Edukacija |
| Podjela radnih zadataka |
| Verifikacija od strane kolega |
| Zakoni i podzakonska akta |
| Pojačan stručni nadzor |

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| Nedostatak procedura o radu (nepostojanje smjernica, pravilnika, uputstava);Teško razumljivi i nedorečeni propisi. |

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| Donijeti interno uputstvo o kontroli i dostavljanju predloga zakona i drugih akata Vladi | rukovodilac institucije | kontinuirano |

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 | RealizovanoU izvještajnom periodu donijeto interno upustvo o kontroli i  |
| Rukovodioci organizacionih jedinica |
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| 5.1 | Dostavljanje predloga zakona i drugih akata Vladi |

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| Samostalni i viši savjetnici u svim sektorima |

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| principa transparentnosti |

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| Edukacija |
| Podjela radnih zadataka |
| Verifikacija od strane kolega |
| Zakoni i podzakonska akta |
| Pojačan stručni nadzor |

 |

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| Nedostatak procedura o radu (nepostojanje smjernica, pravilnika, uputstava);Teško razumljivi i nedorečeni propisi. |

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 | dostavljanju predloga zakona i drugih akata Valdi.. |
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| Praćenje sprovođenja od strane neposrednih rukovodilaca | rukovodilac institucije | kontinuirano | RealizovanoU izvještajnom roku praćeno je sprovođenje od strane neposrednih rukovodilaca. |
| Rukovodioci organizacionih jedinica |
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| 6.1 | Odnosi sa javnošću i marketing služba |

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| direktor |
| marketing služba |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |
| Narušavanje principa transparentnosti |
| Narušavanje integriteta institucije |
| Gubitak povjerenja građana u rad službenika i institucije |

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| Zakoni i podzakonska akta |
| Princip četiri oka |

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| Nedovoljna informisanost javnosti o radu institucije |

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

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 | Nije realizovanoNije određen službenik zadužen za odnose sa javnošću. |
| marketing služba |
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| 7.1 | Slobodan pristup informacijama |

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| direktor |
| službenik za javne nabavke |

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| Narušavanje principa transparentnosti |

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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.  | direktor | kontinuirano |

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 | RealizovanoObjavljen Vodić za slobodan pristup informacijama. |
| službenik za javne nabavke |
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|  | **PODNOSILAC IZVJEŠTAJA** |  | **STARJEŠINA/ODGOVORNO LICE U ORGANU VLASTI** |  |
|  | **Menadžer integriteta** |  |  | **Dir. Rade Tabaš** |  |
|  | **Aleksandra Bećir Pavićević\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |  | **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |