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АГЕНЦИЈА ЗА БОРБУ
ПРОТИВ КОРУПЦИЈЕ

MANUAL FOR THE INTEGRITY PLAN DEVELOPMENT

Manual for the Integrity Plan Development

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Introduction

The Law on the Anti-corruption Agency sets a legal obligation to the government authorities and organisations, authorities of the territorial autonomy, local self-governments, public services, and public enterprises to adopt their respective integrity plans. For the purpose of enacting this legal obligation, the Anti-corruption Agency and the Government of the Republic of Serbia signed the Memorandum of Understanding, on 18 June 2010 obliging the Government and government authorities to develop the integrity plans in line with the Guidelines published by the Agency and in the manner and within the timelines that would be subsequently prescribed. The Agency developed and published the Guidelines for the Development and Implementation of the Integrity Plans (the *Official Gazette of the RoS*, No. 80/10) in October 2010. The Guidelines define the structure of the integrity plan, method of its development per phases, implementation of various tasks, timelines for the development, method of monitoring and implementation of the integrity plan.

This is the first time that, through the development of the integrity plan, one of the good governance mechanisms has been introduced in the public sector of the Republic of Serbia in a systematic manner. Evaluation and critical re-examination of government authorities' practices has not yet become a common practice in their functioning. Rigorous and formal implementation of the legislation is insufficient for creation of a functional system resistant to corruption. Adoption of the integrity plans is a good way to illustrate the importance of engaging good governance and introducing practices and standards that may not necessarily be prescribed as binding; however, their introduction facilitates and enables a more efficient and better quality of actions in the institutions.

1. Definition, Objective, and Importance of the Integrity Plan

What Is the Integrity Plan?

Combating corruption is one of the biggest challenges in modern societies. Corruption may be prevented through enforcement of preventive and repressive measures. The prevention precludes incidence of corruptive practices, while repressive measures are enforced once corruption has already occurred and its consequences emerged.

One of the methods of mitigating the scope of corruption is to detect and eliminate its causes, i.e. risks of incidence and development of corruption, including not only the corruption in forms of giving and accepting bribes, but also in terms of unethical and professionally unacceptable behaviour.

The integrity plan represents a preventive anti-corruption measure. The integrity plan is a document created as a result of a self-appraisal of the risks the institution may be exposed to in relation to incidences and development of corruption, as well as of the risks of unethical and professionally unacceptable behaviour. The objective of the integrity plan is to reinforce the integrity of an institution, including individual honesty, professionalism, ethical behaviour, institutional entirety, as well as acting in accordance with moral values. Strengthening of the institution's integrity will mitigate the risk of official powers being exercised contrary to the objectives the institution has been established for, thus contributing to the improvements in the institution's quality of operation and, consequently, enhancing public trust in their work.

The Objective and Importance of Adopting the Integrity Plan

The objective of the integrity plan is to ensure efficient and effective functioning of institutions in public and private sectors. This can be achieved through the following procedures: simplifying complex procedures or abolishing unnecessary ones, controlling and reducing discretionary managerial powers, strengthening accountability of employees, increasing transparency of operations, reinforcing professionalism and ethical behaviour; then, through education, establishing of standards, introduction of an efficient system of internal control, and elimination of inefficient practices and unenforceable regulations. In order to implement all these procedures, within the scope of the development of the integrity plan, it is necessary to make a prior analysis of, *for example*, complex or unnecessary procedures, what the reflection of managerial discretionary powers is and what are their consequences, areas that demand additional training of employees, etc.

It is not the purpose of the integrity plan to resolve individual cases of corruption, but rather to establish the mechanisms that will preclude and eliminate the circumstances that give rise to corruption practices, unethical and unprofessional behaviour in all the operational areas of the institution. Another objective of the integrity plans is raising the awareness of officials and employees about the damage caused by corruption, with the idea of achieving “zero tolerance for corruption”¹. During the development of the integrity plan, the institution assesses the quality of legislation, personnel, and prevailing processes in all areas of its operation (management of the institution, finances, human resources, public procurements, information, etc.), which is the first step towards improving the quality of work in these areas.

An important characteristic of the integrity plan is that it allows the staff of the institution to participate in its development and implementation, since the employees are most familiar with the functioning of the institution at which they are employed. With their own knowledge and experience, they can identify and assess the risks of occurrences of corruption and other irregularities in the best possible manner, and propose adequate measures and activities for their mitigation or elimination altogether.

2. Glossary of Terms

Integrity: individual honesty, adherence to a set of moral values and principles, institutional entirety, a coherent and consistent behaviour;

Risk in the context of the integrity plan: probability of damage resulting from a current or future event that may jeopardise the integrity of an institution, i.e. exposure to corruption, unethical and professionally unacceptable behaviour, and other irregularities; this risk poses a potential shortcoming in functioning of an institution that may be rooted in statutes, method of their interpretation, implementation in practice, work organisation or the personnel implementing them;

Risk assessment: an appraisal of the existing level of the institution’s exposure to a specific risk; risk assessment represents the appraisal to which extent the institution is exposed to a particular risk;

1 “Zero tolerance for corruption” means that there are no exceptions in reacting to corruptive behaviour.

Improvement measure: a measure that might prevent, mitigate or eliminate the identified risk;

Activities: actions that should be undertaken in order to achieve a measure of improvement and eliminate, prevent or mitigate the identified risk;

Area: a key area of the institution's functioning or exercising its competences;

Process: a series of linked activities required for functioning of an area and a field of competence, respectively.

3. Draft Integrity Plan

For the purpose of assisting the institutions in adopting their respective integrity plans, the Anti-corruption Agency has developed draft i.e. model integrity plans, adjusted to various types of institutions.

The contents of draft integrity plans were developed through two processes: 1) Based on data and information, proposals and suggestions submitted to the Agency by members of the working groups established for preparation of the draft document, 2) Based on data analysis made as a result of research survey for verification and supplements to the draft integrity plans.

Members of the working groups from various state authorities (109 members in total), divided into 14 systems, took part in the development of the draft integrity plan: 1) political system, 2) judiciary system, 3) law enforcement system, 4) public administration and local self-government system, 5) defence system, 6) finance system, 7) system of economy and agriculture, 8) social welfare system, 9) healthcare system, 10) system of education and science, 11) system of culture and sports, 12) environment and infrastructure system, 13) system of personal data protection, human rights, and public interest, and 14) system of public companies.

Members of the working groups, in collaboration with the Agency, have assessed the areas and processes most prone to risks of the occurrences and development of corruption and other irregularities. As a result of such work, risks were defined and adequate improvement measures for their prevention and elimination have been identified. The working groups were engaged in preparation of the integrity plan drafts, from December 2010 until September 2011, at meetings and task preparations for the needs of draft integrity plan contents. Therefore, risks were defined with the assistance of the representatives, who are familiar with competences and functioning of their own institutions.

During the period from September 25 to October 31, 2011, the Agency conducted a survey in the institutions whose representatives did not participate in the working groups. The survey focused on:

- Verification of the risks identified until then with respect to their recognition and appraisal of the level of the institution's exposure to a specified risk;
- Verification of suggested improvement measures with respect to assessment of their success and feasibility;
- Additional or suggested introduction of new risks within each process and self-appraisal of the level of exposure to proposed risks;
- Additional or suggested introduction of new improvement measures for the proposed risks and self-appraisal of their success and feasibility.

These processes resulted in the development of 69 draft integrity plans in total, split according to the systems. For example, there are seven draft integrity plans developed for the System of Education, namely for the institutions which, according to their respective mandates, fall within this system:

1. Ministry of Education and Science;
2. Intellectual Property Office;
3. University;
4. Faculty/Institution of higher education;
5. Secondary/elementary school;
6. Pre-school institution;
7. Students' lodging facilities.

The draft integrity plan comprises areas recognised by the working groups, in collaboration with the Agency, as the areas that are most prone to corruption and other irregularities. During the draft development process, the identified areas were divided in the following way: **common areas, ethics and personal integrity areas, and specific areas**. The common areas are the key areas shared by all the institutions without which none of them could function properly. The ethics and personal integrity area refers to the conduct of personnel and officials in public sector that is in compliance with moral values and exercising of their official mandate with the designated purpose. The specific areas refer to institutional powers, performance of the institution's social functions, i.e. the functions it has been established to exercise. Requisite processes for performing these functions have been identified in each of the mentioned areas while individual and specific risks that might jeopardise the efficiency and quality of the process performance have been specified within each process, in addition to the measures for prevention/mitigation of the recognised risks.

Common Areas

- Management of the institution;
- Management of finance;
- Management of public procurements;
- Documentation management;
- Management of human resources;
- Security.

Ethics and Personal Integrity Area

- Conflict of interest;
- Acceptance of gifts;
- Effective reaction to reported cases of corruption, unethical and professionally unacceptable behaviour;
- Protection of whistle-blowers voicing concerns over cases of corruption, unethical and professionally unacceptable behaviour.

Specific Areas

- These refer to specific competences of an institution (for example: System of Local Self-government – Area/Competences: construction and town-planning affairs).

The specific areas are stipulated in the draft integrity plans only for the institutions for which

data had been obtained from members of the working groups or from the survey carried out.

Based on the draft document developed in such a manner, each institution shall carry out its own self-appraisal related to all the mentioned areas and processes, with the aim of establishing whether the risks related to statutes and human resources exist or not, i.e. whether the identified risks occur or might occur and thus jeopardise the integrity of the institution.

4. Which Entities Develop the Integrity Plan?

The entities obliged to adopt the integrity plans include:

- Government authorities and organisations;
- Territorial autonomy and local self-government authorities;
- Public services (for example: cultural, educational, and scientific institutions; institutions of physical education, student's housing & welfare, healthcare, social welfare, children's welfare, social insurance, animal health protection, etc.);
- Public companies.

Where an institution exercises its mandate through its organisational units (branch and local offices, etc.) in the territory of the Republic of Serbia, each organisational unit shall adopt its own integrity plan.

Other legal entities may adopt their own integrity plans in accordance with the Guidelines for the Development and Implementation of the Integrity Plan.

For the purpose of monitoring of the adoption and implementation of the integrity plans, the Anti-corruption Agency has established a database of entities obliged to adopt the integrity plans, which can be found on the Agency's Web page (<http://www.acas.rs/sektor-za-poslove-prevenције/planovi-integriteta>).

5. Development of the Integrity Plan

The development of the integrity plan is a systematic process carried out through the following phases:

- Preparatory phase;
- Assessment and appraisal of the current state – risk assessment phase;
- Final phase or adoption of a plan of measures for integrity improvements.

Keeping or adopting certain documents has been envisaged in each of these phases. The Agency has prepared models of these documents for the development of the integrity plans, the documents are attached as Annexes to this Manual and are its integral parts.

6. Preparatory Phase

During the preparatory phase, the head of the organisation shall decide on the appointment of a working group for the development of the integrity plan.

Model of the Decision on Appointment of the Working Group for the Development of the Integrity Plan: Annex No.1

The working group includes 5 to 7 members, depending on the institution's complexity and number of employees. For institutions having up to 10-15 employees, the working group may include 3 members and, if there are over 1000 employees, the working group should comprise at least 7 members. Members of the working group should be engaged in the institution's key areas of operation (finance, human resources, documentation management department, IT department, departments linked to the core competences of the institution, etc.), at various levels and work posts.

The working group has its coordinator. The person who is the coordinator may also be the person in charge of the oversight of the IP development.

During the development of the integrity plan, especially during assessment and appraisal of the risks the institution may be exposed to, it is recommended to involve also the employees who are not members of the working groups, but who may give useful information to the working group about functioning of the area that is being assessed, for the purpose of a more objective and qualitative appraisal (*for example: during assessment of risks the institution may be exposed to in the area of security, where none of the members of the working group are familiar with that area, it will be necessary to involve the employees from this field in order to assess the institution's risk in that area in a more objective and qualitative manner*).

Once the working group has been established, it shall proceed to develop the integrity plan. The programme shall include activities and tasks that shall be carried out per phases, those responsible for the implementation of such tasks, and respective times for completion.

Model of Schedule of Development and Implementation of the Integrity Plan: Annex No. 2

The working group shall keep the Minutes of each meeting held.

Model of the Minutes of the Meeting of the Working Group: Annex No. 3

The working group and the head of the institution are both obliged to acquaint the employees with the definition, objective, importance, and method of the development of the integrity plan.

The working group may familiarise the employees with the development of the IP in one of the following ways:

- At all-staff meetings (recommended for institutions with a small number of employees);
- By posting a notification at a conspicuous spot in the institution;
- By sending an e-mail to all the employees;
- By holding meetings at sectorial level (recommended for institutions with a large number of employees).

Model of the Notification to the Employees: Annex No. 4

7. Phase of Assessment and Appraisal of Current State – Appraisal of Risk

The second phase is dedicated to the assessment and appraisal of the current state of affairs and risk and resilience of working processes in the areas under the institution's mandate.

The working group and employees shall assess and evaluate the working processes and relationships in the institution's fields of work, thus identifying the risks and improvement measures within the normative framework, human resources, and processes in practice. In addition to the assessment of the already mentioned areas and processes stipulated in the draft integrity plan, the working group should also assess other areas of importance for its functioning, especially those related to the institution's competences exposed to risks.

Two key steps are required in order to achieve this:

1. Assessment and appraisal of the current state of risk by means of filling out the questionnaires by employees;
2. Assessment and appraisal of the current state of risk by the appointed working group.

Questionnaires (indirect survey) and interviews (direct survey) or discussions with employees are the most commonly used methods and they represent the core instruments for data gathering and establishing the current state of affairs in an institution. A combination of both surveying methods provides for making use of the benefits of one method, while avoiding the shortcomings of the other one.

The survey comprised of questionnaire items and discussions with employees represents a systematic process that includes statements (risks in form of statements) through which the employees and the working group specify their level of agreement or disagreement. The systematic approach is ensured by putting the same questions to all the respondents, while the answers are recorded in the same manner scored and analysed according to the same method.

Statements on functioning and organisation of the institution are measured by an extended Likert-type Scale. The employees and the working group will express their agreement or disagreement with recognised risks – given statements on a scale from 1 to 7, assigned to each of them. The scaling has the following meaning: (1) I totally agree, (2) I agree, (3) I partially agree, (4) I partially disagree, (5) I disagree, (6) I totally disagree, and as for the questionnaire item (7) I don't know and/or I am not in a position to answer.

The purpose of such a method of development of the integrity plan is to collect clear, precise, and quantified responses to risks the given process may be exposed to, and to ensure a higher level of validity and reliability of data and information. At the same time, the Agency is making an effort to build up a mechanism of longitudinal, panel survey research in the field of the integrity plans in public sector in the Republic of Serbia that will be able to survey manifestation dynamics and risk variations in the areas defined in draft integrity plans in the future.

8. Assessment and Appraisal of Current State of Risk through Questionnaires Filled Out by Employees

The first step in assessment and appraisal of the current state of the institution's risk is filling out the questionnaires by the employees. The questionnaires are an important tool for assessment and

appraisal of the state of risk since the working group shall use the results received from the respondents during the assessment and appraisal of the current state of the institution's exposure to risks. At the same time, the questionnaire represents a control mechanism in the sense of narrowing major discrepancies with respect to the working group's assessment and appraisal of risk , thus giving the employees a chance to take a proactive role in the development of the integrity plan of their own institution.

It is important that, prior to filling out the questionnaires, the head of the institution and the working group inform the employees about the objective and method of the development of the integrity plan and the importance of objective and proper filling out of the questionnaire.

The employees are allowed to fill out the questionnaire online, i.e. via the Internet, through access to the server of the Anti-corruption Agency. This will **significantly** reduce the costs and the time of survey, offering a very large survey sample and facilitating quantitative processing of data and information already entered into the computer. The employees may log in to the server of the Agency by entering the user name and proceed with the filling out of the questionnaire. It is necessary to inform all the employees about their obligation and the deadline for completion of the questionnaire, as well as the user name for the log in. It is possible to fill out the questionnaire from any computer, even outside the institution, within a certain deadline from commissioning of the draft integrity plan. After expiry of the deadline, it will no longer be possible to fill out the questionnaire online. The filled out questionnaires shall be subjected to a statistical computer analysis and the results shall be forwarded to the working group at the institution. The working group shall analyse the received results and shall use them for their final risk assessment and appraisal per the institution's areas of operation.

Instructions for Online Access to the Questionnaire: Annex No. 5.

If the management of your institution prefers to have the questionnaire filled out in hard copy, this can also be arranged, in a different format than the previously offered one. In that case, it is important to ensure anonymity in filling out of the questionnaire. One of the ways this can be achieved is to organise filling out of questionnaires at the level of different representative groups of respondents in a meeting room or to send the questionnaire to employees via E-mail specifying the place where completed questionnaires should be submitted. It is recommended not to extend the deadline, since the main purpose of the results from the questionnaire is their use by the working group during objective assessment and appraisal of the institution's exposure to risks.

Model of the Questionnaire in Hard Copy: Annex No. 6

The questionnaires filled out in hard copy will be subjected to own statistical analysis by the working group, who will use them for their assessment and development of the integrity plan with the help of a software application.

Model of Statistical Processing of Data from the Questionnaire in Hard Copy: Annex No. 7

9. Assessment and Appraisal of the Current State of Risk by the Appointed Working Group

The second step in the assessment and appraisal of the current state of your institution's exposure to risks is the development of the integrity plan using a software application that shall be available after expiry of the deadline for filling out of the questionnaire.

The working group may log on to the link with draft integrity plans by entering the user name and the password your institution has received by E-mail or in written form.

Instructions for Online Access to the Integrity Plan Development: Annex No. 8

The working group may access the computer system and the software application with the draft integrity plan on multiple occasions by entering the user name and its password. The software application for the integrity plan is designed in such a way that the working group has a possibility to choose which area they will assess first. During the assessment and appraisal of a process within an area, the working group may hold discussions or conduct interviews with employees, who are familiar with the processes necessary for functioning of the area and who might assist them in making a more objective assessment. The software application allows saving of evaluated processes for the specified area, while other processes may be evaluated at a later stage, which means that it is not necessary to evaluate all at the same time. The working group shall proceed with the appraisal of one area after the other, until all of them are covered.

Based on a qualitative analysis of available documentation, examples, and experiences from practice, the employees' responses to questionnaires and discussions conducted with the employees, the working group shall assess the received responses and make the final evaluation of the institution's exposure to risks of corruption and other irregularities by the specified areas.

How to Identify and Assess the Risks?

The first step in risk identification is to distinguish the areas and processes in which there is a probability of a risk occurring and damaging the integrity of the institution.

There are three components required for proper functioning of each institution – statutes, human resources, and organisational framework. Sound statutes, personnel, and organisational framework make the institution resilient to corruption and other irregularities. A dysfunction in any of these components gives rise to creation of opportunities and possibilities for occurrence of corruption. How can one recognise the areas in the institution's functioning where such dysfunctions may occur? One of the ways is for the working group to start from the core areas of operation in the institution, that is to say, the key areas without which the institution could not realise its social function and exercise the competences it has been established to exercise (due attention should be paid to the management of the institution, finances, public procurements, recruitment and selection of personnel, contract negotiating procedures, rendering of services, etc.).

Once the areas that are most exposed to risks have been recognised, the next step would be to identify the processes required for proper functioning of the area.

Since the areas function through processes, and the processes through series of direct and

indirect activities, it is necessary to stipulate the processes necessary for functioning of each area and to identify potential risks in relation to each process.



What are the risks that may jeopardise the integrity of an institution? There is no uniform list of risks, but they may fall under one of the following categories:

- Anything that may jeopardise fulfilment of the institution's social function (the mandate the institution has been established for);
- Anything that may impact the institution's capacity to meet its legal commitments;
- Anything that may jeopardise effective and efficient fulfilment of the rights and needs of beneficiaries of services, as well as the rights and needs of those employed at the institution;
- Anything that may result in occurrence of corruption, unethical and professionally unacceptable behaviour, and other irregularities, i.e. anything that might jeopardise the institution's integrity.

In order for each area - competence to be fulfilled through its respective processes, the required prerequisites include statutes, human resources, and good practices (organisation). What should be assessed in the above three components with respect to each process in order to identify the potential risks?

What Points Should Be Assessed in the Area of Statutes with Respect to Each Specific Process?

- Is the legislative framework required for the functioning of this process available (law, statutes, internal bylaws/guidelines/procedures)?
- Are the available statutes precise, harmonised, and unambiguous?
- Does the existing legislation include the provisions on curbing discretionary powers?
- Does the existing legislation include provisions on accountability and consequences of failure to adhere to/breach of obligations and regulations?

What Points Should Be Assessed in the Area of Human Resources with Respect to Each Specific Process?

- Are the employees, who perform the tasks and activities necessary for execution of a specific process, competent and experienced enough?
- Is there enough professional staff required for efficient execution of the process?
- Are the employees highly professional and impartial in their work?

What Points Should Be Assessed in the Implementation of Processes in Practice?

- Is the established working practice efficient?
- What is the split between the rights, obligations, and accountability like, in the execution of a

process?

- What is the flow of information required for the process execution like?
- Is there an efficient system of internal control in place?
- Are there any sanctions being enforced due to breach of procedures and rules of the procedure?
- Are the procedures complicated?
- Are the statutes enacted?
- Are there clearly defined criteria for decision-making?
- Are the existing procedures transparent?

During the risk identification, the working group should pay due attention to the fact that risks include a situation or events that may occur or are already occurring in the institution.

Example:

Area: Public procurements.

Process: Preparation of tender documents and the tender committee.

Risk: Members of the committee have conflicts of interest.

In this case, it is necessary to analyse if there is a probability that members of the tender committee of this institution might have conflicts of interest (or whether this has already happened); if this is possible, or if there are no measures to prevent a conflict of interest among members of the tender committee, the working group should assign such risk the score envisaged by the offered scale. In addition, it is necessary to analyse what ought to be done / what measures should be introduced, in order to preclude such risk. Adequate improvement measures for this recognised risk might include, for example:

- Consistent application of the rules on recusal of a member of the tender committee;
- Signing a statement confirming that a member of the committee is not in breach of the conflict of interest, as well as a statement of impartiality.

The draft integrity plan already includes the **common areas**, processes and risks, as well as the **areas of ethics and personal integrity** for all the institutions, which are obliged to draw up the integrity plans. For the types of institutions that had their representatives in the working groups, their **specific areas** have also been defined. The institutions, which have no specific competence/area stipulated in their draft integrity plans so far, will themselves stipulate and assess the competences that are most exposed to risks of corruption and other irregularities in their own institutions, in compliance with the methodology specified in the draft integrity plan. These institutions shall submit their competences/areas assessed in the above manner in the form of a printed Excel table and shall submit them to the Agency, as integral parts of their respective integrity plans.

The institutions, for which the specific competences/areas have already been stipulated in their respective draft integrity plans, should also assess any additional competences/areas in their respective institutions that are most prone to risks of corruption and other irregularities, in compliance with the methodology set out in the draft integrity plan. Although the working groups engaged in the preparation of the drafts together with the Agency have managed, to a large extent, to identify the competences/areas specific for various types of institutions, there are probably some more, and it is preferable that each institution should invest additional efforts and assess, on their own, their specific

competences/areas that may be exposed to risks of corruption and irregularities in their own work. These institutions shall submit to the Agency such assessed competences/areas in the form of a printed Excel table, as an integral part of their respective integrity plans.

Model of Making the Assessment of Risk in the Form of Excel Table: Annex No. 9

10. Final Phase – Plan of Measures for Integrity Improvement

This phase is intended for the proposition of measures for improvement of integrity of an institution, and/or for elimination of identified risks.

Once risks are identified in the manner as specified in the previous chapter by areas of functioning of the institution, the working group shall propose adequate measures for prevention and elimination of risks.

In view of the fact that the integrity plan is a mechanism for self-appraisal of functioning of an institution, measures that are proposed should be economical, efficient, and easily implementable in the institution.

Example:

Area: Management of documentation.

Process: Classification and assignment of dossiers.

Risk: Dossiers are not classified according to the established order.

Improvement measures:

- Introduction of automatic processing of dossiers;
- Rotation of tasks of employees;
- Rotation of employees in this process.

Example

Area: Ethics and personal integrity

If you have established that, in the existing internal bylaw (the code of ethics or the labour relations bylaw), you do not have provisions that are related to conflict of interest, receipt of gifts, effective dealing with reports on corruption, ethically and professionally unacceptable behaviour, or to the protection of employees, who report corruption, ethically and professionally unacceptable behaviours, three or four specific internal bylaws need not be adopted, but instead the provisions covering this area should be included in the already existing code of ethics or the labour relations bylaw or only one internal bylaw should be adopted, which will cover the specified area.

The draft integrity plan shall specify by areas - for each identified risk, the improvement measures and activities required for attaining the objectives.

The working group shall, out of the proposed activities and improvement measures, select those that are the most adequate ones for prevention, elimination or reduction of the assessed risk. If it deems that none of the offered activities is adequate, it shall specify, in the section – Other – the activity that will in the most efficient and the most cost-effective way deal with the assessed risk.

After selection of the measure, and/or activity, in the list of planned measures, the priority of implementation of measures will be listed out in compliance with the level of the assessed risk, the person in charge of the task will be appointed (the person responsible for implementation of the

selected activities), and the deadline for its implementation defined.



In the section “Responsible person”, you will write down the name of the person, who will be responsible for the implementation of the selected improvement measure - activity (you may specify a number of persons if the selected measure – activity requires that). In the section “Deadline”, you will specify the deadline for implementation of the selected measure - activity (some measures and activities may be stipulated as permanent tasks while, for others, the implementation deadline will be specified – in case measures - activities are time-limited, then the deadline for their implementation may not exceed 3 years, in view of the fact that the adoption of the integrity plan is scheduled for every third year).

Example: If you specified, as a measure – activity, that it is necessary to adopt a specific internal bylaw or to amend it, then you must appoint the person, who will be responsible for the implementation of that measure and specify the deadline within which you will adopt or amend the bylaw, which may not exceed three years.

After the working group has made the assessment of a certain area, selected the improvement measures, or activities, appointed the responsible person, and specified the deadline for the implementation of the selected measure in the list of planned measures, it needs to print out that list of planned measures. After all the risk areas have been assessed, the printed out lists of planned activities of the institution together with the decision in writing on appointment of the person in charge of monitoring of the implementation of the integrity plan shall be submitted to the Agency.

Example: Once you have assessed the risks for the area of management of the institution, select adequate improvement measures and, in the list of planned measures, designate the person and specify the deadline for the implementation of the measure; then print out the list of planned measures and proceed doing so after each assessed area.

Upon completion of the development of the integrity plan, the working group shall make the final report.

Model of the Final Report: Annex No. 10

The head of the institution shall take the decision adopting the developed integrity plan, dissolve the working group, and appoint the person responsible for monitoring of the implementation of the planned improvement measures specified in the integrity plan.

Model of the Decision on Appointment of the Person Responsible for the Monitoring of the Implementation of the Integrity Plan: Annex No. 11

The deadline for appraisal and assessment of all the areas specified in the draft integrity plan shall be by 31/12/2012 at the latest. After that deadline, the system shall be locked and institutions shall no longer have access to the electronic application with the draft integrity plans. You shall keep all the printed out lists of planned measures together with the decision on appointment of the person

responsible for the implementation of the integrity plan, and shall submit one copy thereof to the Agency.

The head of the institution, together with the person responsible for the monitoring of the implementation of the integrity plan, shall appraise the results of the proposed improvement measures.

The integrity plan shall be adopted every third year as of the last adopted plan or earlier if the head of the institution and the person in charge of the implementation of the integrity plan, based on monitoring of the implementation of specific improvement measures, appraise that the proposed measures are not yielding the expected results.

The Agency shall monitor and supervise the development and implementation of the integrity plans in institutions, by direct control in a given institution and through the reports on the implementation thereof submitted to the Agency.

The supervision shall include:

- Whether the development of the plan is under way or whether the developed integrity plan is in compliance with the Guidelines;
- Evaluation of the quality and objectivity of the developed integrity plan;
- Implementation of measures and activities from the plan of measures for improvement of integrity.

A report shall be made on the exercised supervision and the data from the report shall be filed in the records of the Agency.

Based on all the developed integrity plans, the Agency shall be able to monitor causes, occurrence, and change of risks in the areas defined in the draft integrity plans by systems and to give recommendations for prevention of corruption and other irregularities.

Annex No.1 - Model of the Decision on Appointment of the Working Group for Development of the Integrity Plan

Name of the institution _____

Ref. No.: _____

Date: _____

Place: _____

By virtue of Article 59 of the Law on the Anti-corruption Agency (the *Official Gazette of the RoS*, Nos. 97/2008 and 53/2010) and of Article 7 of the Guidelines for Development and Implementation of the Integrity Plan (the *Official Gazette of the RoS*, No. 80/2010) and _____, the head of the institution is taking the:

Decision

1. The working group for the development of the integrity plan is hereby appointed, in compliance with the Guidelines for Development and Implementation of the Integrity Plan, as follows:

- The coordinator _____ (name and surname) _____, _____ (work post)
- Member of the working group _____
-
-
- The person for supervision over the development of the integrity plan.

2. The working group shall prepare the program of the integrity plan development, familiarise the employees with the objective, importance, and method of development of the integrity plan; assess and appraise the current state of risk and resilience of work processes in the areas of functioning of the institution, propose measures and activities for improvement of integrity of the institution; familiarise the employees with the risks of disruption of the integrity, through assessment of risk and the improvement plan. The working group may include other employees of the institution in the development of the draft integrity plan.

3. The working group shall complete the development of the integrity plan not later than by 31/12/2012.

4. The responsible person for adoption of the integrity plan is

_____.

(The head of the institution)

5. This decision shall come into force on the date of its adoption.

Explication

By virtue of Article 59 of the Law on the Anti-corruption Agency (the *Official Gazette of the RoS*, Nos. 97/2008 and 53/2010), the obligation is prescribed that government authorities and organisations, authorities of the territorial autonomy and local self-government, public services, and public enterprises shall adopt their respective integrity plans. The provision of Article 7 of the Guidelines for Development and Implementation of the Integrity Plan (the *Official Gazette of the RoS*, No. 80/10) prescribes that the head of the institution shall take the decision on the development and implementation of the integrity plan and shall appoint the coordinator, members of the working group, and the person in charge of supervision over the development of the integrity plan.

The integrity plan is a document that is the result of the procedure of self-appraisal of exposure of the institution to risks of occurrence and development of corruption, ethically and professionally unacceptable behaviours, aimed to maintain and improve the integrity of the institution through simplification of procedures, strengthening of accountability, control of discretionary powers, education, strengthening of ethics, establishing of an efficient system of control, abolishment of inefficient practices.

The objective of adoption of the integrity plan is creation of an institutional mechanism for prevention and diminishing of the risk that public powers are exercised contrary to the purpose for which they are established, for improvement of efficiency and effectiveness of the operation of the institution.

The working group shall develop the integrity plan of the institution on the basis of the adopted and published draft integrity plan, which has been developed by the Anti-corruption Agency with the representative working groups by systems.

The institution shall submit the decision on appointment of the working group to the Anti-corruption Agency.

(The head of the institution)

To be submitted to:

- Members of the working group
- Anti-corruption Agency
- File room

Annex No. 2 - Schedule of Development and Implementation of the Integrity Plan

Institution:

Responsible person:

Members of the working group:

Date of making of the decision:

Commencement of development:

PHASE 1					
NO.	DEVELOPMENT PHASE	MEASURE / ACTIVITY	RESPONSIBLE PERSON	DATE OF MEETING	DEADLINE
1	PREPARATORY PHASE	The Head of the institution takes the decision on the development of the integrity plan and appointment of the working group	<i>(Head of the institution)</i>		
2		Decision on appointment of the working group submitted to the Anti-corruption Agency			
3		The working group prepares the program of the development and implementation of the integrity plan	<i>(Working Group)</i>		
4		Familiarisation of employees with the integrity plan	<i>(Working Group and the Head of the institution)</i>		

**PHASE
2**

NO.	DEVELOPMENT PHASE	MEASURE / ACTIVITY	RESPONSIBLE PERSON	DATE OF MEETING	DEADLINE
1	PHASE OF APPRAISAL AND ASSESSMENT OF CURRENT STATE	Filling in of the anonymous questionnaires	<i>(Working Group)</i>		
2	– ASSESSMENT OF EXPOSURE	Assessment of exposure to risks and interview with employees	<i>(Working Group)</i>		

**PHASE
3**

NO.	DEVELOPMENT PHASE	MEASURE / ACTIVITY	RESPONSIBLE PERSON	DATE OF MEETING	DEADLINE
1	PLAN OF MEASURES FOR INTEGRITY IMPROVEMENT	Familiarisation of the employees with risks of disruption of integrity, assessment of exposure, and plan of measures for integrity improvement	<i>(Head of the institution)</i>		
2		Preparation of the final report	<i>(Working Group)</i>		
3		Dissolution of the working group and adoption of the developed integrity plan including improvement measures	<i>(Head of the institution)</i>		
4		Appointment of the person responsible for the implementation of the integrity plan	<i>(Head of the institution)</i>		
5		Completed development of the integrity plan			Not later than by 31/12/2012

Annex No. 3 - Minutes of the Meeting of the Working Group for Development of the Integrity Plan

Date of holding the meeting:

Venue:

Those present:

Those absent:

The meeting started at _____ hours.

Agenda:

Date of holding of the next meeting _____

Finished at _____ hours.

Coordinator of the working group

Annex No. 4 - Notification to the Employees

Dear colleagues,

We hereby notify you that _____ (the name of the institution) _____ has commenced the development of its integrity plan.

The deadline for the development of the integrity plan shall be up to 31/12/2012.

The Law on the Anti-corruption Agency prescribes the obligation to adopt the integrity plans by all the government authorities and organisations, authorities of the territorial autonomy and local self-government, public services, and public enterprises in compliance with the Guidelines for their development and implementation, which have been prepared by the Agency.

What is the integrity plan?

The integrity plan is a document that is the result of the procedure of self-appraisal of exposure of the institution to risks of occurrence and development of corruption and other irregularities, aimed to maintain and improve integrity of the institution.

The purpose of the integrity plan is to establish a mechanism that will ensure efficient and effective functioning of the institution through strengthening of accountability, simplification of complicated procedures, increased transparency in decision making, control of discretionary powers, strengthening of ethics, elimination of inefficient practices and unenforceable legislation, introduction of an efficient system of supervision and control.

The development of the integrity plan shall take place in three phases.

The first phase is the preparatory phase, in which the head of the institution shall bring the decision on the development and implementation of the integrity plan and appoint the coordinator, members of the working group, and the person in charge of supervision. The program of implementation of the plan shall be prepared.

The second phase shall be related to the assessment and evaluation of the current state of exposure and resilience of work processes and working relations in the areas of functioning of the institution to risks of occurrence and development of ethically and professionally unacceptable behaviours, corruptive behaviours, and corruption and other irregularities.

The third phase or the final phase is scheduled for proposal of measures and activities for improvement of integrity of the institution.

After adoption of the integrity plan, the head of the institution shall appoint the person in charge of the implementation of the integrity plan, who shall monitor the implementation, efficiency, and results of the implementation of proposed measures for improvement of integrity of the institution.

On _____, we have launched the first phase of the development of the integrity plan, by adopting the decision on the development and implementation of the integrity plan and appointment of members of the working group. The following persons have been appointed to the working group:

-
-
-
-

The working group shall prepare the program of development of the integrity plan, familiarise the employees with the objective, importance, and method of development of the integrity plan; evaluate and assess the current state of risk and resilience of work processes in the areas of functioning of the institution, propose measures and activities for improvement of integrity of the institution; familiarise the employees with risks of disruption of integrity, evaluation of exposure, and the improvement plan.

The coordinator of the working group, in the phase of appraisal of exposure of the institution to risks of occurrence and development of corruption and other irregularities and when proposing adequate measures and activities for reduction and elimination of identified risks, may also include those employees working in the areas of functioning of the institution, which are being assessed (for example, when apprising risks to the area of management of finances, include the employees working in that sector).

In the development of the integrity plan, participation of the employees is important in view of the fact that you are familiar with the functioning of the work processes that you are involved in and you can best identify and assess risks and propose adequate measures and activities for their prevention and elimination.

During the second phase, the employees and officials shall fill in an anonymous questionnaire in the way, which will be subsequently determined.

Place, date, _____

Annex No. 5 - Instructions for Online Access to the Questionnaire

The questionnaire for the employees can be found on the link integritet.acas.rs or on the Web site of the Agency www.acas.rs in the section - Integrity Plan -> *Draft Integrity Plan.*

Step 1:

Enter the User name in lower-case Latin letters and/or numbers your institution has received by E-mail or otherwise and confirm it.

If the system does not let you proceed, check as to whether you entered it in lower-case letters.



Унесите корисничко име :

Step 2:

If you have properly entered the assigned User name, the program will take you to the next page. There will appear the name of your institution and different areas, for which you have to do the filling in.

Select each individual area, which you need to evaluate and the questionnaire covering the selected area will open up for you.



ИНСТИТУЦИЈА:

testdva

ПЛАН ИНТЕГРИТЕТА

Коју област желите да изаберете?

- Заједничка област- безбедност тест
- Заједничка област-јавне набавке тест
- Заједничка област-управљање документацијом тест
- Заједничка област-управљање институцијом тест
- Заједничка област-управљање јавним финансијама тест
- Заједничка област-управљање кадровима тест

Step 3:

Start filling in the questionnaire by opening individual fields (drop-down menu) and, out of the offered options, select the adequate one.

You need to fill in all the offered fields in order to be able to proceed to the evaluation of the next area.

Once you start with the evaluation/filling in of the questionnaire for each area you are to appraise, you will have the processes specified that are required for the particular area to function.

You will appraise each process through legislation, personnel, and processes in practice.

In the first part, where it says: legal framework, processes are specified underneath the title, and risks on the right-hand side as shown by the arrow. (E.g. the process: Preparation of the annual procurement plan, preparation of bidding documents, and forming of the committee....etc.)

How Do You Appraise Risks in Relation to a Specific Process?

For example:

Area: Public procurements.

Process: Preparation of bidding documents and forming of the committee.

Risk: Legislation for implementation of this process does not exist.

Underneath the risks, in the same column, it says: law, statute, internal bylaw and, in the drop-down menu – I agree, I disagree, I don't know and/or I am not in a position to answer.

In view of the fact that the specified process is regulated by the law, your answer to this risk in the column where it says: law, will be – «I disagree». You will thus make assessments for statute and internal bylaw one by one.

In the majority of the specified areas it will be the case that they are regulated by the law, but there will be situations, in appraisal of certain processes, where the necessary statutes and/or internal bylaws have not been adopted. Then your answer in the drop-down menu will be - «I agree».

If, for some processes you are appraising, adoption of statutes and/or internal bylaws is not planned, then you also must answer to the question put, in view of the fact that the program will not let you proceed if you fail to answer. In such a case, click on – «I disagree».

If, for any reason, you cannot answer an offered question/statement, you have the possibility to select the option «I don't know and/or I am not in a position to answer».

In case that, in the first risk, you marked that the legislation for functioning of that process does not exist, then the answers to other risks will be «there is no such risk», or «I totally disagree» (you still have to answer, because the program will not let you proceed to the next page).

Once you finish the assessment of risks for all the processes in the specified area with respect to the LEGISLATIVE FRAMEWORK, you will proceed to appraise risks for all the processes in relation to the PERSONNEL FRAMEWORK.

When assessing risks related to personnel, you will assess as to whether the employees in your institution, who are involved in the specified process, have the knowledge, experience, integrity – by expressing your agreement or disagreement with the offered standpoints.

For the PROCESSES IN PRACTICE, risks are specified that, in addition to the risks that are specified in the legislative and personnel frameworks, may occur or are occurring in practice.

ПЛАН ИНТЕГРИТЕТА - УПИТНИК

СПЕЦИФИЧНЕ НАДЛЕЖНОСТИ (ОБЛАСТИ)

СУФИНАНСИРАЊЕ ПРОЈЕКТА/ДОТАЦИЈЕ/ДОДЕЛА СРЕДСТАВА

НОРМАТИВНИ ОКВИР

РИЗИК ПРОЦЕС ↓	Регулатива за извршење овог процеса не постоји	Регулатива за извршење овог процеса постоји, али је:	Регулатива за извршење овог процеса омогућава неконтролисано дискреционо одлучивање	Регулатива за извршење овог процеса не постоји или је нејасна
Процес суфинансирања пројеката/дотација/доделе средстава	Закон: <input type="text" value="Не знам и/или нисам у могућнос"/>	Закон: <input type="text" value="Не знам и/или нисам у могућнос"/>	<input type="text" value="Одаберите:"/>	<input type="text" value="Одаберите:"/>
	Подзаконски акт: <input type="text" value="Не знам и/или нисам у могућнос"/>	Подзаконски акт: <input type="text" value="Не знам и/или нисам у могућнос"/>		
	Интерни акт: <input type="text" value="Не знам и/или нисам у могућнос"/>	Интерни акт: <input type="text" value="Не знам и/или нисам у могућнос"/>		

Step 5:

Once you have filled in all the offered fields, click on the option »Save and finish« and the program will take you to the home page on which you selected that area.

ПРОЦЕСИ У ПРАКСИ		
РИЗИК ПРОЦЕС ↓	Процес оцјене понуда и избора понуђача се не објављује на веб страни институције	Исти чланови припремају понуде
Оцена понуде и избор понуђача	<input type="text" value="Одаберите:"/>	<input type="text" value="Одаберите:"/>
ПРОЦЕСИ У ПРАКСИ		
РИЗИК ПРОЦЕС ↓	Склопљени уговори и сви анекси уговора не објављују се на веб страни институције	Исти чланови припремају понуде
Склапање уговора	<input type="text" value="Одаберите:"/>	<input type="text" value="Одаберите:"/>
ПРОЦЕСИ У ПРАКСИ		
РИЗИК ПРОЦЕС ↓	Праћење реализације уговора се не спроводи	Извештај и пратећа документација се не објављују на веб страни институције
Реализација уговора	<input type="text" value="Одаберите:"/>	<input type="text" value="Одаберите:"/>

>>

Step 6:

Select the next area by clicking in front of the area and confirm the selected by clicking on that option. On the same principle, proceed with filling in the questionnaire as in the previous area.

ПЛАН ИНТЕГРИТЕТА

Коју област желите да изаберете?

- Заједничка област- безбедност тест
- Заједничка област-јавне набавке тест
- Заједничка област-управљање документацијом тест
- Заједничка област-управљање институцијом тест
- Заједничка област-управљање јавним финансијама тест
- Заједничка област-управљање кадровима тест

Изабрано потврдити

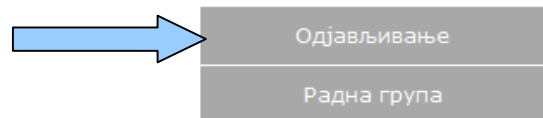
Step 7:

If you wish to go back to the area, which you have already assessed, if you wish to correct something, it has been saved – you just have to click in front of that area, confirm the selected by clicking on the option „confirm the selected“ and it will be opened for you and, after opening, save it again, in order to be able to proceed with the assessment of the areas that follow.

Step 8:

The questionnaire will be completely filled out when all the areas are filled in, which were offered to you.

You will exit the program by clicking on the option »Logoff«.



ПЛАН ИНТЕГРИТЕТА

Коју област желите да изаберете?

- Заједничка област- безбедност тест
- Заједничка област-јавне набавке тест
- Заједничка област-управљање документацијом тест
- Заједничка област-управљање институцијом тест
- Заједничка област-управљање јавним финансијама тест
- Заједничка област-управљање кадровима тест

Изабрано потврдити

Annex No. 6 - Model of the Questionnaire in Hard Copy for All the Areas You Are Appraising

Questionnaire

System:

Institution:

ID:

I/ COMMON AREAS

I/1 AREA: MANAGEMENT OF THE INSTITUTION

Process I/1/1: Follow up of Regulations

I/1/1A(R) 1 The internal bylaw/manual, which prescribes the obligation and responsibility to follow up regulations, does not exist.

I very much agree		I agree		I partially agree	
I partially disagree		I disagree		I totally disagree	
I don't know and/or I am not in a position to answer					

I/1/1A(R)2 The internal bylaw/ manual for follow up of regulations does exist, but it is imprecise.

I very much agree		I agree		I partially agree	
I partially disagree		I disagree		I totally disagree	
I don't know and/or I am not in a position to answer					

I/1/1A(R)3 The internal bylaw for follow up of regulations is inconsistently and/or incompletely applied.

I very much agree		I agree		I partially agree	
I partially disagree		I disagree		I totally disagree	
I don't know and/or I am not in a position to answer					

I/1/1C(R)1 Follow up and recording of regulations is not up-to-date.

I very much agree		I agree		I partially agree	
I partially disagree		I disagree		I totally disagree	
I don't know and/or I am not in a position to answer					

I/1/1C(R)2 The person in charge of follow up of regulations has not been appointed.

I very much agree		I agree		I partially agree	
I partially disagree		I disagree		I totally disagree	
I don't know and/or I am not in a position to answer					

I/1/1C(R)3 The regulations that govern the operation of the institution are not published on the Web page of the institution.

I very much agree		I agree		I partially agree	
I partially disagree		I disagree		I totally disagree	
I don't know and/or I am not in a position to answer					

In the same way, you should further assess the other processes within the area of Management of the Institution.

Once you have finished, proceed with the second common area of Management of Public Finances.

I/2 AREA: MANAGEMENT OF PUBLIC FINANCES

Process I/2/1: Preparation of the Financial Plan

I/2/1A(R)1 The legislation for functioning of this process does not exist.

	I agree	I disagree
Law		
Statute		
Internal bylaw		

I/2/1A(R)2 The legislation for functioning of this process does exist, but it is:

	Law	Statute	Internal bylaw
Imprecise			
Contradictory			
Obsolete			
Incompatible			

I/2/1A(R)3 The legislation for functioning of this process enables uncontrolled discretionary decision making.

I very much agree		I agree		I partially agree	
I partially disagree		I disagree		I totally disagree	
I don't know		I am not in a position to answer			

I/2/1A(R)4 The legislation for functioning of this process does not contain provisions on accountability and consequences to those who do not implement it and/or violate it.

I very much agree		I agree		I partially agree	
I partially disagree		I disagree		I totally disagree	
I don't know and/or I am not in a position to answer					

I/2/1A(R)5 The legislation for functioning of this process is inconsistently and/or incompletely applied.

I very much agree		I agree		I partially agree	
I partially disagree		I disagree		I totally disagree	
I don't know and/or I am not in a position to answer					

I/2/1B(R)1 The employees, who are involved in this process, do not have sufficient knowledge to perform it.

I very much agree		I agree		I partially agree	
I partially disagree		I disagree		I totally disagree	
I don't know and/or I am not in a position to answer					

I/2/1B(R)2 The employees, who perform this process, do not have sufficient experience to perform it.

I very much agree		I agree		I partially agree	
I partially disagree		I disagree		I totally disagree	
I don't know and/or I am not in a position to answer					

I/2/1B(R)3 The employees, who perform this process, have a low level of integrity (professionalism, ethical quality, impartiality...).

I very much agree		I agree		I partially agree	
I partially disagree		I disagree		I totally disagree	

I don't know and/or I am not in a position to answer			
--	--	--	--

I/2/1C(R)1 The financial plan is not prepared on the basis of a detailed analysis of the requirements of the institution.

I very much agree		I agree		I partially agree	
I partially disagree		I disagree		I totally disagree	
I don't know and/or I am not in a position to answer					

I/2/1C(R) 2 Criteria, based on which current and other expenses and expenditure are planned, as well as allocation of funds, are not clearly defined.

I very much agree		I agree		I partially agree	
I partially disagree		I disagree		I totally disagree	
I don't know and/or I am not in a position to answer					

On the same principle, proceed with the assessment of all the areas and processes until you finish them all.

Annex No. 7 - Example How to Fill in the Questionnaires Made in Hard Copy

Anonymous Questionnaire for Employees

In the process of filling in of the Questionnaire for Employees in Hard Copy, we differentiate 3 processes.

- The process of statistical processing of data obtained from anonymous Questionnaires filled in by the employees;
- The process of assessment of the current state based on the data from anonymous Questionnaires;
- Implementation of the assessment of the current state from anonymous Questionnaires in the development of the integrity plan (by the Working Group);

1. Statistical Processing of Data from the Questionnaires

In the process of statistical processing of data from the Questionnaires made in hard copy, it is necessary to do the following:

- To numerically express the answers of the employees for every assessed risk of a process in the area that is assessed.

For example: **AREA - SECURITY**

PROCESS - PHYSICAL AND TECHNICAL SECURITY

RISK - The legislation (law) for functioning of this process does not exist

I agree _____ (number of answers)

I disagree _____ (number of answers)

I don't know and/or I am not in a position to answer _____ (number of

answers)

The legislation (law) for functioning of this process does exist, but it is:

Contradictory _____ (number of answers)

Inconsistent _____ (number of answers)

Obsolete _____ (number of answers)

Imprecise _____ (number of answers)

There is no such risk _____ (number of answers)

The legislation for functioning of this process enables uncontrolled discretionary decision taking:

I very much agree _____ (number of answers)

I agree _____ (number of answers)

I partially agree _____ (number of answers)

I partially disagree _____ (number of answers)

I disagree _____ (number of answers)

I totally disagree _____ (number of answers)

I don't know and/or I am not in a position to answer _____ (number of

answers)

- This principle should be applied to all the areas that the employees have assessed.
- Based on the obtained data, make the Assessment of the Current State in the institution.

2. Assessment of the Current State Based on Anonymous Questionnaires of Employees in _____

On _____, in _____, the employees were submitted the anonymous Questionnaire via _____ (the method in which the Questionnaire was submitted to the employees) and they were given the deadline by _____ to fill in the same and to submit them to the working group via _____ (the method of submitting of the filled in Questionnaires).

Out of the total of _____ employees, the questionnaire was filled in by _____.

In the part of the questionnaire that is related to the area of:

A) **Management of the institution**, the employees made the assessment as follows:

_____ % of the employees assessed that the biggest risk is in the legislative framework

_____ of the employees assessed that the biggest risk is in the personnel framework

_____ of the employees assessed that the biggest risk is in the processes in practice

B) **Management of finances**, the employees made the assessment as follows:

_____ of the employees assessed that the biggest risk is in the legislative framework

_____ of the employees assessed that the biggest risk is in the personnel framework

_____ of the employees assessed that the biggest risk is in the processes in practice

C) **Management of documentation**, the employees made the assessment as follows:

_____ of the employees assessed that the biggest risk is in the legislative framework

_____ of the employees assessed that the biggest risk is in the personnel framework

_____ of the employees assessed that the biggest risk is in the processes in practice

D) **Public procurements**, the employees made the assessment as follows:

_____ of the employees assessed that the biggest risk is in the legislative framework

_____ of the employees assessed that the biggest risk is in the personnel framework

_____ of the employees assessed that the biggest risk is in the processes in practice

E) **Management of personnel**, the employees made the assessment as follows:

_____ of the employees assessed that the biggest risk is in the legislative framework

_____ of the employees assessed that the biggest risk is in the personnel framework

_____ of the employees assessed that the biggest risk is in the processes in practice

F) **Security**, the employees made the assessment as follows:

_____ of the employees assessed that the biggest risk is in the legislative framework

_____ of the employees assessed that the biggest risk is in the personnel framework

_____ of the employees assessed that the biggest risk is in the processes in practice.

Proceed by analysing all the assessed areas in the same way.

3. After the process of assessment of the current state in the institution obtained based on the Questionnaire for Employees, it is necessary to take those results into account during the phase of appraisal and assessment – assessment of risk, which is to be made, in the process of development of the integrity plan, by the working group.

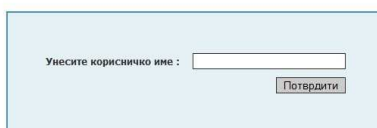
Annex No. 8 - Instructions for Technical Access to the Integrity Plan Development

Draft integrity plans can be found on the link integritet.acas.rs or on the Web site of the Agency www.acas.rs in the section - Integrity Plan -> *Draft Integrity Plan*.

Step 1:

Enter the User name in lower-case Latin letters and/or numbers your institution has received by E-mail and confirm it.

If the system does not let you proceed, check as to whether you entered it in lower-case letters.

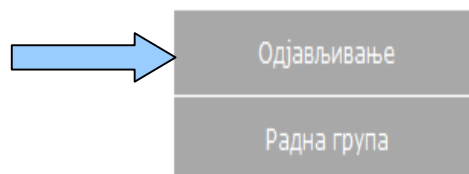


Унесите корисничко име :

Potvrditi

Step 2:

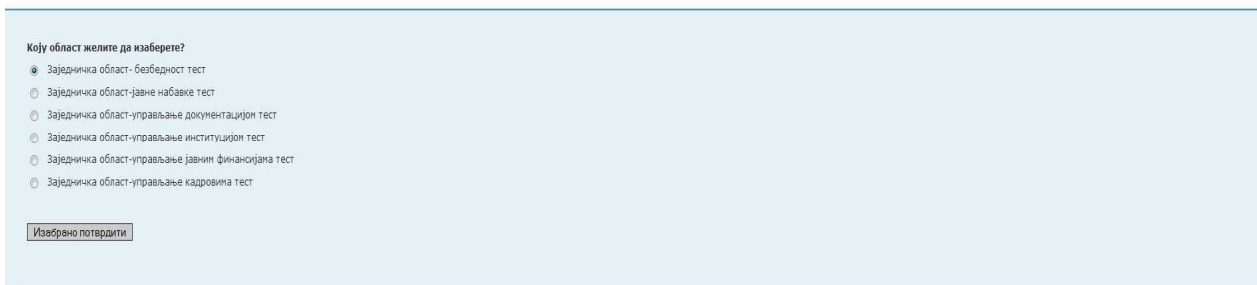
If you have properly entered the assigned user name, the program will take you to the next page. In the right upper corner, click on the designation „Working Group“, as shown by the arrow.



ИНСТИТУЦИЈА:

Одјављивање
Радна група

ПЛАН ИНТЕГРИТЕТА



Коју област желите да изаберете?

- Заједничка област - безбедност тест
- Заједничка област - јавне набавке тест
- Заједничка област - управљање документацијом тест
- Заједничка област - управљање институцијом тест
- Заједничка област - управљање јавним финансијана тест
- Заједничка област - управљање кадровима тест

Изабрано потврдити

Step 3:

The page showing the name of your institution and the user name that you have already previously entered will open up for you.

Enter the assigned password in lower-case Latin letters and/or numbers, which your institution received via E-mail or otherwise.

If the system does not let you proceed, check whether you entered it in lower-case letters.

Step 4:

Click on the button “Confirm” and the program will take you to the home page.



ИНСТИТУЦИЈА: testdva

Институција : testdva
Корисничко име : testdva
Унесите лозинку :

Step 5:

If you have mistakenly entered a wrong password, the program will inform you about it in red letters “Wrong password”.



ИНСТИТУЦИЈА:

Погрешна лозинка!

Step 6:

After you have properly entered the password, the program will take you to the home page for the development of the integrity plan. Start working by clicking on the first offered area and confirm the selected.

ПЛАН ИНТЕГРИТЕТА

Коју област желите да изаберете?

- Заједничка област- безбедност тест
- Заједничка област-јавне набавке тест
- Заједничка област-управљање документацијом тест
- Заједничка област-управљање институцијом тест
- Заједничка област-управљање јавним финансијама тест
- Заједничка област-управљање кадровима тест

Изабрано потврдити

Step 7:

Start filling in the integrity plan by opening individual fields (drop-down menu) and select an adequate one out of the offered options.

You need to fill in all the offered fields in order to be able to proceed to the next page – improvement measures.

Once you start with the appraisal/filling in for each area you are appraising, the processes required for functioning of that area are specified.

You will assess every process through legislation, personnel, and processes in practice.

In the first part, in which it says: legislative framework, processes are specified underneath the title, and risks on the right-hand side as shown by the arrow. (For example, Processes: Preparation of the annual plan of public procurements, preparation of bidding documents, and forming of the committee...).

How Do You Appraise Risks in Relation to a Specific Process?

Example:

Area: Public procurements

Process: Preparation of bidding documents and forming of the committee

Risk: Legislation for the functioning of this process does not exist

Underneath the risks, in the same column, it says: law, statute, internal bylaw and, in the drop-down menu – «I agree», «I disagree» and so on.

In view of the fact that the specified process is regulated by the law, your answer to this risk, in the column saying: law, will be – «I disagree». You will thus make assessments for statute and internal bylaw one by one. If, for the process you are assessing, adoption of a statute is planned, and that bylaw has not been adopted – your answer will be – «I agree».

In the majority of the specified areas it will be the case that they are regulated by the law, but there will be situations, in assessing of certain processes, where the necessary statutes and/or internal bylaws have not been adopted. Then your answer in the drop-down menu will be - «I agree».

If, for some processes you are appraising, adoption of statutes and/or internal bylaws is not planned, then you also must answer to the question put, in view of the fact that the program will not let you proceed if you fail to answer. In such a case, click on – «I disagree».

In case, in the first risk, you marked that the legislation for functioning of that process does not exist, then the answers to other risks will be - «there is no such risk» or «I totally disagree» (you still have to answer to all the risks, because the program will not let you proceed to the next page).

Once you have finished with the assessment of risks for all the processes in the specified area in relation to the LEGISLATIVE FRAMEWORK, proceed with the appraisal of risks for all the processes in relation to the PERSONNEL FRAMEWORK.

When assessing risks related to personnel, you will assess as to whether the employees in your institution, who are involved in the specified process, have the knowledge, experience, integrity – by expressing your agreement or disagreement with the offered standpoints.

For the PROCESSES IN PRACTICE, risks are specified that, in addition to the risks that are specified in the legislative and personnel frameworks, may occur or are occurring in practice.

РЕПУБЛИКА СРБИЈА
АГЕНЦИЈА ЗА БОРБУ
ПРОТИВ КОРУПЦИЈЕ

ИНСТИТУЦИЈА: МИНИСТАРСТВО ПРАВДЕ СИСТЕМ: РАДНА ГРУПА:

ПЛАН ИНТЕГРИТЕТА

ЗАЈЕДНИЧКЕ ОБЛАСТИ

ЈАВНЕ НАБАВКЕ

НОРМАТИВНИ ОКВИР

РИЗИК ПРОЦЕС	Регулатива за извршење овог процеса не постоји	Регулатива за извршење овог процеса постоји, али је:	Регулатива за извршење овог процеса омогућава неконтролисано дискреционо одлучивање	Регулатива садржи последње или к...
Припрема годишњег плана набавки	Закон: Одаберите: Слажем се Не слажем се Интерни акт: Одаберите:	Закон: Одаберите: Подзаконски акт: Одаберите: Интерни акт: Одаберите:	Одаберите:	Одаб...
Припрема конкурсне документације и образовање комисије	Закон: Одаберите: Подзаконски акт: Одаберите: Интерни акт:	Закон: Одаберите: Подзаконски акт: Одаберите: Интерни акт:	Одаберите:	Одаб...

РЕПУБЛИКА СРБИЈА
АГЕНЦИЈА ЗА БОРБУ
ПРОТИВ КОРУПЦИЈЕ

ИНСТИТУЦИЈА: МИНИСТАРСТВО ПРАВДЕ СИСТЕМ: РАДНА ГРУПА:

ПЛАН ИНТЕГРИТЕТА

ЗАЈЕДНИЧКЕ ОБЛАСТИ

ЈАВНЕ НАБАВКЕ

НОРМАТИВНИ ОКВИР

РИЗИК ПРОЦЕС	Регулатива за извршење овог процеса не постоји	Регулатива за извршење овог процеса постоји, али је:	Регулатива за извршење овог процеса омогућава неконтролисано дискреционо одлучивање	Регулатива садржи последње или к...
Припрема годишњег плана набавки	Закон: Одаберите: Подзаконски акт: Одаберите: Интерни акт: Одаберите:	Закон: Одаберите: Подзаконски акт: Одаберите: Интерни акт: Одаберите:	Одаберите:	Одаб...
Припрема конкурсне документације и образовање комисије	Закон: Одаберите: Подзаконски акт: Одаберите: Интерни акт:	Закон: Одаберите: Подзаконски акт: Одаберите: Интерни акт:	Одаберите: Веома се слажем Слажем се Делимично се слажем Делимично се не слажем Не слажем се Никако се не слажем	Одаб...

Step 8:

If the program does not let you go to the next page, have a look in the left upper corner, where you have the number of fields you have filled in relative to the total number of fields that need to be filled in. The fields that you have filled in are automatically saved, so that you need to fill in only those fields that have not been filled out.

Подаци су сачувани (14 / 20)



ИНСТИТУЦИЈА:	Ustanova za rešavanje anket	СИСТЕМ:	
		РАДНА ГРУПА:	

ПЛАН ИНТЕГРИТЕТА

СПЕЦИФИЧНЕ НАДЛЕЖНОСТИ (ОБЛАСТИ)

СУФИНАНСИРАЊЕ ПРОЈЕКТА/ДОТАЦИЈЕ/ДОДЕЛА СРЕДСТАВА

НОРМАТИВНИ ОКВИР

РИЗИК ПРОЦЕС	Регулатива за извршење овог процеса не постоји	Регулатива за извршење овог процеса постоји, али је:	Регулатива за извршење овог процеса омогућава неконтролисано дискреционо одлучивање	Регулатива садржи посебне одредбе
Поступак суфинансирања пројеката/дотација/доделе средстава	Закон: Не слажем се Подзаконоски акт: Не слажем се Интерни акт: Слажем се	Закон: Не постоји такав ризик Подзаконоски акт: Не постоји такав ризик Интерни акт: Застарепа	Делимично се слажем	Одабери

КАДАР

РИЗИК ПРОЦЕС	Запослени који извршавају овај процес немају довољно знања за његово обављање	Запослени који извршавају овај процес немају довољно искуства за његово обављање	Запослени који извршавају овај процес имају низак ниво интегритета (професионалност, поштост, интегритет)	Запослени, који извршавају овај процес, немају довољно високу квалификацију
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Step 9:

Once you have filled out all the fields, click on the button “Print” if you wish to have printed out what you have done. When your print window opens, set the Landscape form for printing.

ПРОЦЕСИ У ПРАКСИ					
РИЗИК ПРОЦЕС	Финансијски план се не припрема на основу детаљне анализе потреба институције	Критеријуми на основу којих се планирају текући и остали издаци и расходи, као и расподела средстава нису јасно дефинисани			
Припрема финансијског плана	Одаберите:		Одаберите:		
ПРОЦЕСИ У ПРАКСИ					
РИЗИК ПРОЦЕС	План буџета се не припрема на основу стварних потреба институције	Нема рачуноводствене документације за све трансакције и послове везане за рад институције	Трошење буџетских средстава се не прати	Провера законитости и наменског трошења средстава се не врши	Умањене вредности, по основу амортизације, непокретности, опреме и осталих основних средстава се не идентификују у пословним изјављивањима
Планирање и извршење буџета	Одаберите:	Одаберите:	Одаберите:	Одаберите:	Одаберите:
ПРОЦЕСИ У ПРАКСИ					
РИЗИК ПРОЦЕС	Куповина материјалних средстава се не врши у складу са стварним потребама институције		Систем контроле употребе службених возила и других материјалних средстава је неадекватан и нефиксан		
Употреба и куповина материјалних и основних средстава	Одаберите:		Одаберите:		

МЕРЕ ПОБОЉШАЊА >>> ШТАМПАЈ

Step 10:

If you do not wish to print, click on the button “Improvement measures” and the program will take you to the next page.

ПРОЦЕСИ У ПРАКСИ					
РИЗИК → ПРОЦЕС ↓	Финансијски план се не припрема на основу детаљне анализе потреба институције		Критеријуми на основу којих се планирају текући и остали издаци и расходи, као и расподела средстава нису јасно дефинисани		
Припрема финансијског плана	Одаберите: ▼		Одаберите: ▼		
ПРОЦЕСИ У ПРАКСИ					
РИЗИК → ПРОЦЕС ↓	План буџета се не припрема на основу стварних потреба институције	Нема рачуноводствене документације за све трансакције и послове везане за рад институције	Трошњење буџетских средстава се не прати	Провера законитости и наменског трошњења средстава се не врши	Умањене вредности, по основу амортизације, непокретности, опреме и осталих основних средстава се не видентира у пословним њима
Планирање и извршење буџета	Одаберите: ▼	Одаберите: ▼	Одаберите: ▼	Одаберите: ▼	Одаберите: ▼
ПРОЦЕСИ У ПРАКСИ					
РИЗИК → ПРОЦЕС ↓	Куповина материјалних средстава се не врши у складу са стварним потребама институције		Систем контроле употребе службених возила и других материјалних средстава је неадекватан и неефикасан		
Употреба и куповина материјалних и основних средстава	Одаберите: ▼		Одаберите: ▼		

МЕРЕ ПОВОЉАЊА >>> ШТАМПАЈ

Step 11:

The page with improvement measures will open up for you. By a click, select those measures – activities out of the offered ones for which you believe that are the most adequate ones for resolution of the assessed risk. You may even select a number of the offered activities.

If none of the offered improvement measures/activities suits you, click on the option “Other” and write down your measure – activity.

Once you have filled out all the fields, click on the option “List of planned measures”; on the next page you will have the summary listing of everything you have filled out.

Подаци су сачувани (45 / 45)

		ИНСТИТУЦИЈА: <input type="text" value="Ministarstvo spoljnih poslova"/>	СИСТЕМ: <input type="text"/>				
		РАДНА ГРУПА: <input type="text"/>					
ПЛАН ИНТЕГРИТЕТА ЗАЈЕДНИЧКЕ ОБЛАСТИ УПРАВЉАЊЕ ЈАВНИМ ФИНАНСИЈАМА							
НОРМАТИВНИ ОКВИР							
РИЗИК → ПРОЦЕС ↓	Приоритет мере	Ниво	Регулисати (донети пропис за) извршење овог процеса	Ускладити постојећу регулативу за извршење овог процеса	Резултатом оградити дискреционо одлучивање дефинисањем јасних критеријума и процедура за доношење одлука	Проверити одређене в одговорности и последицама за оне који не примењују или крише прописе којима се регулише овај процес	Успоставити систем контроле за доследну и потпуно примену регулативе за извршење овог процеса
Припрема финансијског плана	Хитно потребне мере	Институционални	Закон: <input type="checkbox"/> Предлагаче доношења прописа <input type="checkbox"/> Доношење прописа Подзаконски акт: <input type="checkbox"/> Предлагаче <input type="checkbox"/> Доношење одговарајућих аката Интерни акт: <input type="checkbox"/> Предлагаче доношења прописа <input type="checkbox"/> Доношење прописа	Закон: <input type="checkbox"/> Предлагаче <input type="checkbox"/> Доношење одговарајућих аката Подзаконски акт: <input type="checkbox"/> Предлагаче <input type="checkbox"/> Доношење одговарајућих аката Интерни акт: <input type="checkbox"/> Предлагаче <input type="checkbox"/> Доношење одговарајућих аката	<input type="checkbox"/> Дефинисање јасних критеријума <input type="checkbox"/> Доношење процедура <input type="checkbox"/> Образлагање дискреционе одлуке <input type="text" value="Друго:"/>	<input type="checkbox"/> Предлагаче <input type="checkbox"/> Доношење одговарајућих аката <input type="text" value="Друго:"/>	<input type="checkbox"/> Одређивање контролора <input type="checkbox"/> Извршавање надзора <input type="checkbox"/> Санционисање за неизвршавање/кришење обавеза <input type="text" value="Друго:"/>
Планирање и извршење буџета	Хитно потребне мере	Институционални	Закон: <input type="checkbox"/> Предлагаче доношења прописа <input type="checkbox"/> Доношење прописа Подзаконски акт: <input type="checkbox"/> Предлагаче <input type="checkbox"/> Доношење одговарајућих аката Интерни акт: <input type="checkbox"/> Предлагаче доношења прописа <input type="checkbox"/> Доношење прописа	Закон: <input type="checkbox"/> Предлагаче <input type="checkbox"/> Доношење одговарајућих аката Подзаконски акт: <input type="checkbox"/> Предлагаче <input type="checkbox"/> Доношење одговарајућих аката Интерни акт: <input type="checkbox"/> Предлагаче <input type="checkbox"/> Доношење одговарајућих аката	<input type="checkbox"/> Дефинисање јасних критеријума <input type="checkbox"/> Доношење процедура <input type="checkbox"/> Образлагање дискреционе одлуке <input type="text" value="Друго:"/>	<input type="checkbox"/> Предлагаче <input type="checkbox"/> Доношење одговарајућих аката <input type="text" value="Друго:"/>	<input type="checkbox"/> Одређивање контролора <input type="checkbox"/> Извршавање надзора <input type="checkbox"/> Санционисање за неизвршавање/кришење обавеза <input type="text" value="Друго:"/>
Употреба и куповина материјалних и основних средстава	Хитно потребне мере	Институционални	Закон: <input type="checkbox"/> Предлагаче доношења прописа <input type="checkbox"/> Доношење прописа Подзаконски акт: <input type="checkbox"/> Предлагаче <input type="checkbox"/> Доношење одговарајућих аката Интерни акт: <input type="checkbox"/> Предлагаче доношења прописа <input type="checkbox"/> Доношење прописа	Закон: <input type="checkbox"/> Предлагаче <input type="checkbox"/> Доношење одговарајућих аката Подзаконски акт: <input type="checkbox"/> Предлагаче <input type="checkbox"/> Доношење одговарајућих аката Интерни акт: <input type="checkbox"/> Предлагаче <input type="checkbox"/> Доношење одговарајућих аката	<input type="checkbox"/> Дефинисање јасних критеријума <input type="checkbox"/> Доношење процедура <input type="checkbox"/> Образлагање дискреционе одлуке <input type="text" value="Друго:"/>	<input type="checkbox"/> Предлагаче <input type="checkbox"/> Доношење одговарајућих аката <input type="text" value="Друго:"/>	<input type="checkbox"/> Одређивање контролора <input type="checkbox"/> Извршавање надзора <input type="checkbox"/> Санционисање за неизвршавање/кришење обавеза <input type="text" value="Друго:"/>

Употреба и куповина материјалних и основних средстава	Нису потребне мере	Институционални	Друго: НОВО	Друго: НОВО	Нису потребне мере
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ПРОЦЕСИ У ПРАКСИ

РИЗИК – ПРОЦЕС	Приоритет мере	Ниво	Припремити финансијски план на основу детаљне анализе и предлога потреба, планираних пројеката од стране организационе јединице (сектора, служби, одељења, одсека, група)	Јасно дефинисати критеријуме на основу којих се планирају трошкови и остали издаци и расходи као и расподела средстава
Припрема финансијског плана	Хитно потребне мере	Институционални	<input checked="" type="checkbox"/> Спроводиње анализе потреба и припремање финансијског плана на основу добијених података <input checked="" type="checkbox"/> Друго: НОВО	<input checked="" type="checkbox"/> Дефинисање критеријума на основу којих се планирају издаци и расходи и врши расподела средстава <input checked="" type="checkbox"/> Друго: НОВО

ПРОЦЕСИ У ПРАКСИ

РИЗИК – ПРОЦЕС	Приоритет мере	Ниво	План буџета израдити на основу планираних активности институције за наредну годину	Обезбедити документовање свих трансакција и послова везаних за рад институције и вршити периодичну контролу њих активности	Успоставити или доследно примењивати систем праћења трошња буџетских елемената	Успоставити контролу провере законитости и наменског трошења резултата	Водити евиденцију непокретности, опреме и осталих основних средстава у пословним књигама према забавној вредности, умањеној за исправну вредности по основу амортизације
Планирање и извршење буџета	Хитно потребне мере	Институционални	<input checked="" type="checkbox"/> Израђивање плана буџета на основу плана рада за наредну годину <input checked="" type="checkbox"/> Друго: НОВО	<input checked="" type="checkbox"/> Одељивање контролора <input checked="" type="checkbox"/> Извештавање надређеног <input checked="" type="checkbox"/> Санкционисање <input checked="" type="checkbox"/> Друго: НОВО	<input checked="" type="checkbox"/> Одељивање контролора <input checked="" type="checkbox"/> Извештавање надређеног <input checked="" type="checkbox"/> Санкционисање <input checked="" type="checkbox"/> Друго: НОВО	<input checked="" type="checkbox"/> Одељивање контролора <input checked="" type="checkbox"/> Извештавање надређеног <input checked="" type="checkbox"/> Санкционисање <input checked="" type="checkbox"/> Друго: НОВО	<input checked="" type="checkbox"/> Евидентирање умњено вредности <input checked="" type="checkbox"/> Редовно инвентарисање са детаљним описом стања и нивоа амортизације <input checked="" type="checkbox"/> Друго: НОВО

ПРОЦЕСИ У ПРАКСИ

РИЗИК – ПРОЦЕС	Приоритет мере	Ниво	Урадити процену стварних потреба институције пре куповине материјалних средстава	Успоставити или доследно примењивати адекватан и ефикасан систем контроле
Употреба и куповина материјалних и основних средстава	Хитно потребне мере	Институционални	<input checked="" type="checkbox"/> Спроводиње процене стварних потреба институције и на основу добијених података набављати материјална средства <input checked="" type="checkbox"/> Друго: НОВО	Нису потребне мере

Step 12:

Once the “List of planned measures” opens up for you, in the field “Responsible person”, you need to write down the name(s) of the person(s) to be in charge of the implementation of improvement measures – activities and, in the field “Deadline”, enter the date up to which the institution will implement the measure.

Example:

Activity: Define procedures and criteria for evaluation and advancement

Responsible person: Head (manager) of the administrative services (you may appoint a number of persons who will be responsible for the implementation of a specific activity)

Deadline: By the end of 2013

You will finish with the appraisal of the selected area by saving the assessed area by clicking on the option “Save and finish” and printing out the filled out “List of planned measures” by clicking on the option “Print”. Once your print window is opened, set Landscape form for printing.

Процесна финансијска линија	Едукација Одрживање запослених са потребним знањем за извршавање задатака Друго: НОВО	Едукација Одрживање запослених са потребним искуством за извршавање задатака Друго: НОВО	Едукација о етици, интегритету и сл. Друго: НОВО	ЈОВО ЈОВИЦ	1.2.2013
Планирање и извршавање буџета	Едукација Одрживање запослених са потребним знањем за извршавање задатака Друго: НОВО	Едукација Одрживање запослених са потребним искуством за извршавање задатака Друго: НОВО	Едукација о етици, интегритету и сл. Друго: НОВО	ЈОВО ЈОВИЦ	1.4.2013
Испорука и куповина материјалних и основних средстава	Нишу потребне мере	Нишу потребне мере	Нишу потребне мере	ЈОВО ЈОВИЦ	1.12.2013

ПРОЦЕСИ У ПРАКСИ

РИЗИК ... ПРОЦЕС :	Процесна финансијска линија на основу детаљне анализе и предлога потреба, планирање процена за статусе приликованости (капацитет, стручна, људска, друга)	Датум до-финансијског контролирања на основу којег се проверију, утврди и остави издати и распореди средства	Одрживост линије	Рок
Процесна финансијска линија	Спроводиће анализе потреба и припремаће финансијског плана на основу добијених података Друго: НОВО	Датум до-финансијског контролирања на основу којег се проверију, утврди и остави издати и распореди средства	ЈОВО ЈОВИЦ	30.12.2013

ПРОЦЕСИ У ПРАКСИ


РИЗИК ... ПРОЦЕС :	Плане буџета издати на основу постојећег статуса и интегритета за наредну годину	Обавиће документационе, сам контролне и послове везане за рад институције и издати периодичну контролу или извештаје	Успоставиће систем документационе, контролне и послове везане за рад институције и издати периодичну контролу или извештаје	Успоставиће контролу процена запослених и финансијског статуса	Водити и извршавати контролне, контроле и послове везане за рад институције и издати периодичну контролу или извештаје	Одрживост линије	Рок
Планирање и извршавање буџета	Израђиваће плане буџета на основу плана рада за наредну годину Друго: НОВО	Одрживаће контроле Извештавање надлежних Самодисциплина Друго: НОВО	Одрживаће контроле Извештавање надлежних Самодисциплина Друго: НОВО	Одрживаће контроле Извештавање надлежних Самодисциплина Друго: НОВО	Контроле и послове везане за рад институције и издати периодичну контролу или извештаје	ЈОВО ЈОВИЦ	1.6.2013

ПРОЦЕСИ У ПРАКСИ

РИЗИК ... ПРОЦЕС :	Тржиште процене стањених потреба институције при куповини материјалних средстава	Успоставиће систем документационе, контролне и послове везане за рад институције и издати периодичну контролу или извештаје	Одрживост линије	Рок	
Испорука и куповина материјалних и основних средстава	Спроводиће процене стањених потреба институције и на основу добијених података набављати материјална средства Друго: НОВО	Успоставиће систем документационе, контролне и послове везане за рад институције и издати периодичну контролу или извештаје	Нишу потребне мере	ЈОВО ЈОВИЦ	1.1.2014

Step 13:

Once you are done with the work, the program will again take you to the page where you need to select the next area.



ИНСТИТУЦИЈА: testiva

Одрживање
Радна група

ПЛАН ИНТЕГРИТЕТА

Коју област желите да изаберете?

- Заједничка област - безбедност тест
- Заједничка област - јавне набавке тест
- Заједничка област - управљање документационим тест
- Заједничка област - управљање институционим тест
- Заједничка област - управљање јавним финансијима тест
- Заједничка област - управљање кадровима тест

Step 14:

If you wish to go back to the area you have already assessed, if you wish to correct something, it has been saved – you only need to click in front of that area, confirm the selected by clicking on the option „Confirm the selected“ and it will open up for you and, after opening it, save it again, so that you can proceed with the assessment of the areas that follow.

The integrity plan on the Web application will be completely finished once you have assessed all the areas offered for your institution.

Step 15:

You will exit the program by clicking, in the right upper corner, on the option »Logoff«.



ИНСТИТУЦИЈА:

ПЛАН ИНТЕГРИТЕТА - РАДНА ГРУПА



Одјављивање

Одјављивање

Step 16:

Once you have assessed all the necessary areas, keep the printed out “Lists of planned measures”, in view of the fact that they are to be submitted to the Anti-corruption Agency.

Annex No. 9 Model of Making the Assessment of Risk in the Form of Excel Table

СИСТЕМ ДРЖАВНЕ УПРАВЕ И ЛОКАЛНЕ САМОУПРАВЕ								
ИНСТИТУЦИЈА: ЛОКАЛНА САМОУПРАВА								
СПЕЦИФИЧНЕ НАДЛЕЖНОСТИ (ОБЛАСТИ)								
Надлежност (област) III/2 ИНСПЕКЦИЈСКИ ПОСЛОВИ								
ФАЗА ПРОЦЕНЕ И ОЦЕНЕ ПОСТОЈЕЋЕГ СТАЊА ИНТЕГРИТЕТА У ИНСТИТУЦИЈИ – ОЦЕНА ИЗЛОЖЕНОСТИ								
Процес	РИЗИК	НОРМАТИВНИ ОКВИР	Слажем се	Не слажем се				
III/2/1 Инспекцијски надзор	1	Регулатива за извршење овог процеса не постоји а) закон б) подзаконски акт ц) интерни акт		x				
	2	Регулатива за извршење овог процеса постоји, али је: а) закон б) подзаконски акт ц) интерни акт	непрецизан	контрадикторан	застарео	неусклађен		
	3	Регулатива за извршење овог процеса омогућава неконтролисано дискреционо одлучивање	Веома се слажем (1)	Слажем се (2)	Делимично се слажем (3)	Делимично се не слажем (4)	Не слажем се (5)	Никако се не слажем (6)
	4	Регулатива за извршење овог процеса не садржи одредбе о одговорности и последицама за оне који је не примењују и/или крше	x					
	5	Регулатива за извршење овог процеса се недоследно и/или непотпуно примењује						
	МЕРА ПОБОЉШАЊА	НОРМАТИВНИ ОКВИР	Активности	Приоритет спровођења мере	Одговорно лице	Рок за извршење		
	1	Регулисати (донети прописе за) извршење овог процеса	а) Предлагање доношења прописа б) Доношење прописа					
	2	Ускладити постојећу регулативу за извршење овог процеса	а) Предлагање доношења прописа б) Доношење одговарајућих аката					
	3	Регулативом ограничити дискреционо одлучивање дефинисањем јасних критеријума и процедура за доношење одлука	а) Дефинисање јасних критеријума б) Доношење процедура ц) Образлагање дискреционе одлуке					
	4	Прописати одредбе о одговорности и последицама за оне који не примењују и/или крше прописе којима се регулише овај процес	а) Предлагање доношења прописа б) Доношење одговарајућих аката					
	5	Успоставити систем контроле за доследну и потпуну примену регулативе за извршење овог процеса	а) Одређивање контролора б) Извештавање надређеног ц) Санкционисање за неизвршење/кршење обавезе					
	РИЗИК	КАДАР	Веома се слажем (1)	Слажем се (2)	Делимично се слажем (3)	Делимично се не слажем (4)	Не слажем се (5)	Никако се не слажем (6)
	1	Запослени који извршавају овај процес немају довољно знања за његово обављање						
	2	Запослени који извршавају овај процес немају довољно искуства за његово обављање						
	3	Запослени, који извршавају овај процес су недовољно мотивисани						
	4	Запослени који извршавају овај процес имају низак ниво интегритета (професионалност, етичност, непристрасност)						
	5	Нема довољно запослених за квалитетно извршење овог процеса						
	МЕРА ПОБОЉШАЊА	КАДАР	Активности	Приоритет спровођења мере	Одговорно лице	Рок за извршење		
	1	Едуковати и/или одредити запослене са знањем за извршење овог процеса	а) Едукација б) Одређивање запослених са знањем за извршење овог процеса					
	2	Едуковати и/или одредити запослене са искуством (потребним вештинама) за извршење овог процеса	а) Едукација б) Одређивање запослених са искуством (потребним вештинама) за извршење овог процеса					
	3	Успоставити и/или доследно примењивати систем мотивисања запослених	а) Напредовање б) Стручно усавршавање ц) Награђивање и сл.					
	4	Јачати интегритет запослених који извршавају овај процес	а) Едукација о етици, интегритету и сл.					
	5	Запослити и/или адекватно прераспоредити постојећи кадар за извршење овог процеса	а) Прераспоређивање постојећег кадра б) Реорганизовање посла ц) Запошљавање					

	РИЗИК	ПРОЦЕСИ У ПРАКСИ	Веома се слажем (1)	Слажем се (2)	Делимично се слажем (3)	Делимично се не слажем (4)	Не слажем се (5)	Никако се не слажем (6)
	1	Неблаговремено се доносе решења (решење о обавизи странке се не доноси у року)						
	2	Систем контроле рада инспектора није ефикасан (јављају се неправилности у раду: инспектори не предузимају мере за које су овлашћени, не поступа се по пријавама грађана, селективно се врши надзор..)						
	3	Механизам за праћење и оцену квалитета и квантитета обављања инспекцијског рада не постоји.						
	4	Поступање инспектора по усменом налогу од стране руководиоца						

	МЕРА ПОБОЉШАЊА	ПРОЦЕСИ У ПРАКСИ	Активности	Приоритет спровођења мере	Одговорно лице	Рок за извршење
	1	Успоставити и доследно примењивати систем за доношење решења у унапред одређеном року	а) Успостављање и/или доследно примењивање система за доношење решења у року, нпр. Систем 48			
	2	Успоставити систем ефикасне контроле над радом инспектора	а) Одређивање контролора б) Извештавање надређеног ц) Санкционисање за неизвршење/кршење обавезе д) Ротирање терена е) Увођење варијабилног дела			
	3	Успоставити и/или доследно примењивати механизам праћења и оцене квалитета и квантитета обављеног инспекцијског рада/надзора	а) Вођење евиденције обављеног посла б) Самовредновање једног годишње кроз истраживање јавног мњења ц) Анкете корисника услуга и сл.			
	4	Утврдити јасну процедуру која установљава обавезу руководиоца да изда писмени налог инспектору за вршење инспекцијског надзора	а) Утврђивање јасне процедуре која установљава обавезу руководиоца да изда писмени налог инспектору за вршење инспекцијског надзора			

Оцену ризика вршите тако што од понуђених опција одаберете одговарајућу стављајући "X" код одабране опције								
Пример: Ризик: Регулатива за извршење овог процеса омогућава неконтролисано одлучивање								
Оцена: ако се "делимично слажете" само ставите "X" испод одабране опције								
Код мера побољшања потребно је у рубрици -активности- навести активност/и потребне за извршење мере								
Ако оценили ризик/став са Веома се слажем и Слажем се, тада ће спровођење мере побољшања бити - Хитно потребно								
Ако оценили ризик/став са Делимично се слажем или Делимично се не слажем, тада ће спровођење мере побољшања бити - Потребно								
Ако оценили ризик/став са Не слажем се или Никако се не слажем, тада ће спровођење мере побољшања бити - Није потребно								
У рубрику - Приоритет спровођења мере - уписати да ли је спровођење - Хитно потребно - Потребно - Није потребно								

Annex No. 10 - Final Report of the Working Group for Development of the Integrity Plan

(The name of the institution) _____ has developed the integrity plan _____ in compliance with the Guidelines for Development and Implementation of the Integrity Plan (IP) (the *Official Gazette of the RoS*, Nos. 97/2008 and 53/2010) and with the draft integrity plan, and submitted the developed IP to the Anti-corruption Agency on _____ (date), as well as took the decision on appointment of the person responsible for the implementation of the integrity plan.

(Proceed by briefly specifying how the IP was developed by phases, how many times the working group met, whether the working group kept the minutes of every meeting held, whether the working group, while developing the IP, included other employees, apart from those who are members of the working group, whether the working group, when assessing the risks, also had in mind the results of the questionnaire filled out by the employees, whether, in the second phase of the development, in specific powers – the members recognised and assessed some additional risks apart from those offered in the draft IP...)

Coordinator of the Working Group

Annex No. 11 - Model of the Decision on Appointment of the Person Responsible for the Monitoring of the Implementation of the Integrity Plan

Name of the institution _____

Ref. No.: _____

Date: _____

Belgrade

By virtue of Article 59 of the Law on the Anti-corruption Agency (the *Official Gazette of the RoS*, Nos. 97/2008 and 53/2010), of Articles 17 and 18 of the Guidelines for Development and Implementation of the Integrity Plan (the *Official Gazette of the RoS*, No. 80/2010), and _____, the head of the institution is taking the:

Decision

1. The developed integrity plan is adopted and the appointed Working Group for development of the integrity plan is dissolved.

2. The person responsible for the implementation of the integrity plan is hereby appointed:

- _____ (name and surname) _____, _____ (work post) _____

2. This decision shall come into force on the date of its adoption.

Explication

By virtue of Article 59 of the Law on the Anti-corruption Agency (the *Official Gazette of the RoS*, Nos. 97/2008 and 53/2010), the obligation is prescribed that government authorities and organisations, the authorities of territorial autonomy and local self-government, public services, and public enterprises shall adopt their respective integrity plans. The provisions of Articles 17 and 18 of the Guidelines for Development and Implementation of the Integrity Plan (the *Official Gazette of the RoS*, No. 80/10) prescribe that the head of the institution shall take the decision on adoption of the developed integrity plan, dissolve the working group, and appoint the person responsible for the implementation of the integrity plan.

The person responsible for the implementation of the integrity plan shall monitor whether the measures from the plan of improvement of integrity of the institution are implemented, prepare indicators for appraisal of efficiency and assessment of results of the proposed measures for integrity improvement.

(The head of the institution)

To be submitted to:

- Members of the working group
- Appointed person
- Anti-corruption Agency
- Archive