

INTEGRITY PLAN
OF THE ACCREDITATION BODY OF MONTENEGRO
(for the two-year period 2025–2026)

Podgorica, September 2024

INTRODUCTION:

NAME OF THE INSTITUTION: Accreditation Body of Montenegro (ATCG)

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NAME AND TITLE OF THE PERSON RESPONSIBLE FOR THE PREPARATION AND IMPLEMENTATION OF THE INTEGRITY PLAN (INTEGRITY MANAGER):

Dušan Vukotić, Head of the Department for Development and International Cooperation

DATE AND REFERENCE NUMBER OF THE DECISION APPOINTING THE INTEGRITY MANAGER:

ATCG No. 15-732 of 1 August 2024

DATE AND REFERENCE NUMBER OF THE DECISION APPOINTING THE MEMBERS OF THE WORKING GROUP FOR THE PREPARATION OF THE INTEGRITY PLAN:

ATCG No. 15-732/1 of 1 August 2024

MEMBERS OF THE WORKING GROUP:

Dušan Vukotić, Head of the Working Group

Nataša Mićunović, Member of the Working Group

Ana Radović, Member of the Working Group

DATE OF COMMENCEMENT OF PREPARATION: 2 August 2024

DATE OF COMPLETION OF PREPARATION: 4 September 2024

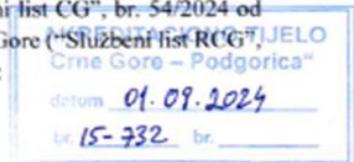
DATE OF ADOPTION OF THE INTEGRITY PLAN: 6 September 2024

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1. DECISION ON THE APPOINTMENT OF THE PERSON RESPONSIBLE FOR THE PREPARATION AND IMPLEMENTATION OF THE INTEGRITY PLAN (INTEGRITY MANAGER)

Na osnovu čl. 78 stav 1 Zakona o sprečavanju korupcije ("Službeni list CG", br. 54/2024 od 11.06.2024.), čl.12 Odluke o osnivanju Akreditacionog tijela Crne Gore ("Službeni list RCG", br. 21/07) i čl.14 Statuta Akreditacionog tijela Crne Gore, donosim:



RJEŠENJE

o imenovanju menadžera integriteta Akreditacionog tijela Crne Gore

I

Dipl. inž. Dušan Vukotić, raspoređen na radno mjesto Rukovodile Službe za razvoj i međunarodnu saradnju, imenuje se za lice koje je odgovorno za pripremu i praćenje realizacije Plana integriteta – menadžera integriteta.

II

Menadžer integriteta obavljaće naročito poslove koji se odnose na:

- rukovođenje radnom grupom za pripremu i izradu Plana integriteta;
- koordinaciju i učešće u pripremi programa izrade Plana integriteta;
- koordinaciju i učešće u sakupljanju i analizi relevantne dokumentacije koja se odnosi na organizovanje i rad Akreditacionog tijela Crne Gore, a koja predstavlja osnovu za procjenu rizika i izradu Plana integriteta;
- nadzor nad realizacijom mjera za jačanje integriteta Akreditacionog tijela Crne Gore;
- u saradnji sa svim organizacionim jedinicama, sačinjavanje izvještaja o sprovođenju Plana integriteta.

III

Imenovanom pripada naknada za rad na poslovima menadžera integriteta, a čija će visina biti utvrđena posebnom odlukom.

IV

Ovo rješenje stupa na snagu danom donošenja.

V

Donošenjem ovog rješenja stavlja se van snage i prestaje da važi Rješenje br.13-145 od 17.03.2022. godine.

Obrazloženje

Zakonom o sprečavanju korupcije ("Službeni list CG", br. 54/2024 od 11.06.2024.) utvrđena je obaveza donošenja Plana integriteta za sve organe vlasti. Plan integriteta sadrži mjere kojima se sprečavaju i otklanjaju mogućnosti za nastanak i razvoj korupcije i obezbjeđuje povjerenje građana u njihov rad. Plan integriteta donosi se u skladu sa pravilima za izradu i sprovođenje

plana integriteta koja donosi Agencija za sprečavanje korupcije. S tim u vezi, a shodno čl. 78 istog Zakona, propisano je da starješina, odnosno odgovorno lice u organu vlasti rješenjem određuje menadžera integriteta koji je odgovoran za izradu i praćenje realizacije Plana integriteta.

Rješenjem br.13-145 od 17.03.2022. godine, direktorica Akreditacionog tijela Crne Gore je imenovala Dušana Vukotića, rukovodioca Službe za razvoj i međunarodnu saradnju, za menadžera integriteta Akreditacionog tijela Crne Gore.

Imajući u vidu donošenje novog Zakona o sprečavanju korupcije (stupio na snagu dana 11.06.2024. godine), nastala je potreba za izmjenom preambule u predhodno navedenom Rješenju kako bi se obezbijedilo pravilno referenciranje na odnosne članove novog Zakona o sprečavanju korupcije. Imenovani menadžer integriteta, opis poslova i ostale odredbe iz predhodnog rješenja su ostali nepromijenjeni.

Menadžeru integriteta pripada naknada za rad, shodno preporuci Agencije za sprečavanje korupcije br.00-53/5-22 od 18.02.2022. godine.

Na osnovu izloženog riješeno je kao u dispozitivu ovog rješenja.

PRAVNA POUKA: Protiv ovog rješenja može se iz izjaviti žalba Agenciji za mirno rješavanje radnih sporova ili Centru za alternativno rješavanje sporova u roku od 15 dana od dana prijema istog, odnosno nadležnom sudu u roku od 15 dana od dana obustave postupka pred navedenim organima.

Direktorica Akreditacionog tijela Crne Gore

Anita Krulanović

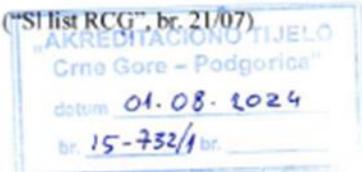


Dostavljeno:

- Imenovanom
- Agenciji za sprečavanje korupcije
- Arhivi

2. DECISION ON THE ESTABLISHMENT OF THE WORKING GROUP FOR THE PREPARATION AND DRAFTING OF THE INTEGRITY PLAN

Na osnovu čl.12 Odluke o osnivanju Akreditacionog tijela Crne Gore ("Sl list RCG", br. 21/07) i čl.14 Statuta Akreditacionog tijela Crne Gore, donosim:



RJEŠENJE

o formiranju Radne grupe za pripremu i izradu
Plana integriteta Akreditacionog tijela Crne Gore
za dvogodišnji period 2025-2026. godine

I

Obrazuje se Radna grupa za pripremu i izradu Plana integriteta Akreditacionog tijela Crne Gore za dvogodišnji period 2025-2026. godine (u daljem tekstu: Plan integriteta), u sljedećem sastavu:

- Dušan Vukotić, menadžer integriteta – rukovodilac Radne grupe
- Nataša Mićunović, član Radne grupe
- Ana Radović, član Radne grupe.

II

Zadatak Radne grupe je da utvrdi Program izrade Plana integriteta, prikupi i analizira relevantnu dokumentaciju koja se odnosi na funkcionisanje i rad Akreditacionog tijela Crne Gore, analizira postojeće stanje koje predstavlja osnov za procjenu rezidualnog rizika, upozna zaposlene sa potrebom donošenja Plana integriteta, sačini i najkasnije do 10.09.2024. godine dostavi direktorici ATCG konačan predlog Plana integriteta Akreditacionog tijela Crne Gore za period 2025-2026. godine radi njegovog usvajanja.

III

Članovi Radne grupe imaju pravo na naknadu. Visina naknade za članove Radne grupe biće utvrđena posebnom odlukom.

IV

Ovo rješenje stupa na snagu danom donošenja.

Obrazloženje

Plan integriteta je interni antikorupcijski dokument Akreditacionog tijela Crne Gore u kome je sadržan skup mjera pravne i praktične prirode kojima se sprječavaju i otklanjaju mogućnosti za nastanak i razvoj različitih oblika koruptivnog i neetičkog ponašanja u okviru institucije kao cjeline, pojedinih organizacionih jedinica i pojedinačnih radnih mjesta, a koji nastaje kao rezultat samoprocjene izloženosti rizicima za nastanak i razvoj korupcije, nezakonitog lobiranja i sukoba interesa, kao i izloženosti etički i profesionalno neprihvatljivim postupcima.

Direktorica Akreditacionog tijela Crne Gore je Rješenjem br. 15-732 od 01.08.2024. godine imenovala Menadžera integriteta Akreditacionog tijela Crne Gore, sa zadatkom koordinacije i sprovođenja aktivnosti u vezi sa pripremom, izradom i praćenjem realizacije Planova integriteta Akreditacionog tijela Crne Gore.

Ovim Rješenjem imenuje se Radna grupa sa zadatkom sprovođenja aktivnosti na pripremi i izradi Plana integriteta Akreditacionog tijela Crne Gore za period 2025-2026. godine

Radnoj grupi pripada naknada za rad, shodno preporuci Agencije za sprječavanje korupcije br.00-53/5-22 od 18.02.2022. godine.

Na osnovu izloženog riješeno je kao u dispozitivu ovog rješenja.

PRAVNA POUKA: Protiv ovog rješenja može se iz izjaviti žalba Agenciji za mirno rješavanje radnih sporova ili Centru za alternativno rješavanje sporova u roku od 15 dana od dana prijema istog, odnosno nadležnom sudu u roku od 15 dana od dana obustave postupka pred navedenim organima.

Direktorica Akreditacionog tijela Crne Gore

Anita Krfulanović



Dostavljeno:

- Imenovanim članovima i rukvodiocu Radne grupe
- Arhivi

3. PROGRAMME FOR THE PREPARATION OF THE INTEGRITY PLAN

U skladu sa čl.2 Rješenja o formiranju Radne grupe za pripremu i izradu Plana integriteta Akreditacionog tijela Crne Gore za period 2025-2026. godine (ATCG br. 15-732/I od 01.08.2024.), Radna grupa je sačinila:

PROGRAM IZRADE PLANA INTEGRITETA AKREDITACIONOG TIJELA CRNE GORE ZA PERIOD 2025-2026. GODINE

INSTITUCIJA: AKREDITACIONO TIJELO CRNE GORE

ODGOVORNO LICE: Dušan Vukotić, menadžer integriteta

ČLANOVI RADNE GRUPE: Dušan Vukotić, Nataša Mićunović, Ana Radović

DATUM DONOŠENJA RJEŠENJA: 01.08.2024.

DATUM POČETKA IZRADE: 02.08.2024.

I. FAZA

OSNIVANJE RADNE GRUPE I PRIKUPLJANJE INFORMACIJA

Datum: od 01.08.2024. do 09.08.2024. godine

1. Pripremna faza

Direktorica Akreditacionog tijela Crne Gore donosi Rješenje o imenovanju Radne grupe za pripremu i izradu Plana integriteta Akreditacionog tijela Crne Gore za period 2025-2026. godine (odgovornost: Direktorica)

Datum: 01.08.2024.

2. Radna grupa sakuplja potrebnu dokumentaciju i informacije od zaposlenih i priprema Program izrade Plana integriteta (odgovornost: Radna grupa). Direktorica Akreditacionog tijela Crne Gore odobrava Program izrade Plana integriteta Akreditacionog tijela Crne Gore za period 2025-2026. Godine (odgovornost: Direktorica)

Najkasnije do: 07.08.2024. godine

3. Upoznavanje zaposlenih sa potrebom donošenja Plana integriteta (odgovornost: Radna grupa)

Najkasnije do: 09.08.2024. godine



II. FAZA

UTVRĐIVANJE POSTOJEĆIH MJERA (odgovornost: Radna grupa)

Datum: od 12.08.2024. do 16.08.2024. godine

PROCJENA POSTOJEĆEG STANJA I UTVRĐIVANJE INICIJALNIH FAKTORA RIZIKA (odgovornost: Radna grupa)

1. Intervjui sa zaposlenima
2. Popunjavanje upitnika putem interneta (Radna grupa)
3. Ocjena izloženosti rizicima i razgovor sa zaposlenima (Radna grupa)

Najkasnije do: 23.08.2024. godine

III. FAZA

PLAN MJERA ZA PODIZANJE NIVOVA INTEGRITETA

Datum: od 26.08.2024. do 10.09.2024. godine

1. Upoznavanje zaposlenih sa rizicima narušavanja integriteta, ocjenom izloženosti i planom mjera za poboljšanje integriteta (odgovornost: Radna grupa)
2. Popunjavanje obrasca Plana integriteta i priprema konačnog izvještaja (odgovornost: menadžer integriteta)
3. Usvajanje novoizrađenog Plana integriteta zajedno sa mjerama poboljšanja (odgovornost: Direktorica)
4. Završena izrada novog Plana integriteta Akreditacionog tijela Crne Gore najkasnije do: 10.09.2024. godine (odgovornost: Direktorica i menadžer integriteta)

Program izradila Radna grupa:

Dušan Vukotić, rukovodilac Radne grupe

Nataša Mićunović, član Radne grupe

Ana Radović, član Radne grupe

Program odobrila:

Anita Krulanović
Direktorica ATCG

U Podgorici, dana: 06.08.2024.

REPORT OF THE WORKING GROUP ON THE IMPLEMENTATION OF THE PROGRAMME FOR THE PREPARATION OF THE INTEGRITY PLAN

I. PHASE – ESTABLISHMENT OF THE WORKING GROUP AND COLLECTION OF INFORMATION

By Decision ATCG No. 15-732/1 of 1 August 2024, the Director of the Accreditation Body of Montenegro established a Working Group for the preparation and drafting of the Integrity Plan of the Accreditation Body of Montenegro for the period 2025–2026 (**hereinafter:** the Working Group), with clearly defined tasks and responsibilities (see Section 2 of this document).

Following consultations with the permanently employed staff of the Accreditation Body of Montenegro (**hereinafter:** ATCG), the Working Group, on 5 August 2024, determined the draft Programme for the Preparation of the Integrity Plan, which was approved by the Director of ATCG on 6 August 2024 (ATCG No. 15-744 of 6 August 2024) (see Section 3 of this document).

On 9 August 2024, at a meeting of the ATCG Collegium, the Working Group informed employees of the need to adopt the ATCG Integrity Plan for the period 2025–2026. The primary objective of the preparation of the ATCG Integrity Plan was defined as risk management and the establishment of conditions for the prevention and sanctioning of corruption or other forms of integrity violations at all levels within the institution.

It was also emphasized that the Integrity Plan would be based on the following principles:

- rule of law;
- respect for fundamental human rights and freedoms;
- development of personal and institutional integrity and accountability;
- compliance with national and international standards in this field;
- cooperation with interested parties and relevant institutions;
- transparency of ATCG's work;
- objectivity, independence and impartiality;
- prevention and education;
- accountability for the implementation of the Integrity Plan.

At the above-mentioned meeting, the Working Group also presented to the employees the content of the Programme for the Preparation of the ATCG Integrity Plan for the period 2025–2026 (programme phases, activities and deadlines).

During the aforementioned consultations with permanently employed staff, the relevant documentation to be further considered in the process of risk analysis and the drafting of the Integrity Plan was also reviewed and identified.

The following key legal acts governing the work of the Accreditation Body of Montenegro have been identified:

- Law on Accreditation (“Official Gazette of Montenegro”, Nos. 54/09 and 43/2015) – This Law regulates the establishment and activities of ATCG, prescribes the prohibition of performing certain activities in order to avoid conflicts of interest, defines the bodies of ATCG, regulates the accreditation procedure, defines the manner of financing of ATCG, and provides for supervision over its work.
- Decision on the Establishment of the Accreditation Body of Montenegro (“Official Gazette of the Republic of Montenegro”, No. 21/07) – This Decision further regulates the legal status, name and activities, organization and mode of operation, financing, and supervision of ATCG.
- Labour Law (“Official Gazette of Montenegro”, Nos. 74/2019, 8/2021, 59/2021, 68/2021 and 145/2021) – This Law regulates the rights and obligations of employees arising from employment, prohibition of discrimination, professional training and development, protection of employees’ rights, liability for breaches of work obligations, financial liability, collective agreements, etc.
- Law on Prohibition of Discrimination (“Official Gazette of Montenegro”, Nos. 046/10, 040/11, 018/14, 042/17) – This Law prescribes the prohibition of and protection against discrimination, as well as the promotion of equality.
- Law on Prohibition of Workplace Harassment (“Official Gazette of Montenegro”, Nos. 030/12 and 054/16) – This Law regulates the rights, obligations and responsibilities of employers and employees regarding the prevention of harassment at work and in connection with work (mobbing).
- Law on Prevention of Corruption (“Official Gazette of Montenegro”, No. 54/2024) – This Law prescribes measures for the prevention of conflicts between public and private interests, regulates restrictions in the exercise of public functions, reporting of income and assets of public officials, protection of persons reporting threats to the public interest indicating corruption, and other matters relevant to the prevention of corruption.
- Law on Prohibition of Discrimination of Persons with Disabilities (“Official Gazette of Montenegro”, Nos. 035/15 and 044/15) – This Law regulates the prohibition of and protection against discrimination of persons with disabilities, as well as the promotion of their equality with others.
- Law on Data Secrecy (“Official Gazette of Montenegro”, Nos. 014/08, 076/09, 041/10, 040/11, 038/12, 044/12, 014/13, 018/14, 048/15 and 074/20) – This Law establishes a unified system for classification of data secrecy, access to classified information, storage, use, record-keeping and protection of classified information.
- Law on Free Access to Information (“Official Gazette of Montenegro”, Nos. 044/12 and 030/17) – This Law regulates the right of access to information and the re-use of information held by public authorities.
- Law on Personal Data Protection (“Official Gazette of Montenegro”, Nos. 79/08, 70/09, 44/12 and 22/17) – This Law regulates the rules governing the processing and protection of personal data.
- Law on Salaries of Employees in the Public Sector (“Official Gazette of Montenegro”, Nos. 16/2016, 83/2016, 21/2017, 42/2017, 12/2018, 39/2018 – Constitutional Court Decision, 42/2018, 34/2019, 130/2021 – Constitutional Court Decision of Montenegro, 146/2021, 92/2022, 152/2022, 152/2022-I, 113/2023 –

- Constitutional Court Decision of Montenegro, and 48/2024) – This Law regulates the manner of determining and exercising the right to salary, salary compensation and other benefits of employees in the public sector, the method of securing funds, and other issues relevant to the exercise of these rights.
- Annual State Budget Law – This Law allocates funds to beneficiaries of the State Budget on an annual basis.
 - Public Procurement Law (“Official Gazette of Montenegro”, Nos. 74/2019, 3/2023 and 11/2023 – corrigendum) – This Law regulates public procurement procedures for concluding contracts or framework agreements for the procurement of goods, works or services, protection of rights in public procurement procedures, and other matters relevant to public procurement.
 - Law on Management and Internal Controls in the Public Sector (“Official Gazette of Montenegro”, No. 75/2018) – This Law regulates management and internal controls in the public sector and other issues relevant to the establishment, implementation and development of internal controls.
 - Law on Lobbying (“Official Gazette of Montenegro”, No. 54/2024) – This Law regulates the conditions and manner of conducting lobbying activities, lobbying rules, and other matters relevant to lobbying.
 - Other relevant legislation.

The following key general and internal acts governing the organization and operation of ATCG have been identified:

- Statute of the Accreditation Body of Montenegro (December 2017)
- Rulebook on Internal Organization and Systematization of Job Positions of the Accreditation Body of Montenegro (March 2024)
- Decision on the Amount of Accreditation Fees (December 2007)
- QM.00-2 Quality Manual (including the Quality Policy)
- Management System Procedures (13 documented procedures, e.g. *PR.01-2 Assessment of Conformity Assessment Bodies*, *PR.02-1 Control of Documents and Records*, *PR.03 Control of Nonconformities*, *Corrective Actions and Improvements*, *PR.04 Internal Audits*, *PR.05 Management Review*, *PR.07-1 Risk Management Procedure*, *PR.08 Procedure for Handling Complaints and Appeals*, etc.)
- Accreditation Rules (6 documented rules, e.g. *PA.01 Accreditation Rules*, *PA.02-1 Rules for the Use of the ATCG Logo*, *Accreditation Symbol and Reference to Accreditation*, *PA.03 Rules for Cross-Border Accreditation*, etc.)
- Annual Work Programmes of ATCG
- Annual Activity Reports of ATCG
- Internal acts regulating the organization and operation of the governing, expert and advisory bodies of ATCG
- Code of Ethics
- Other general/internal acts adopted by ATCG

In addition to the above, and in accordance with the assumed European and international obligations in the field of accreditation, ATCG is required to continuously comply with the requirements of the national (European/international) standard *MEST EN ISO/IEC 17011:2018 – Conformity Assessment – Requirements for Accreditation Bodies Accrediting*

Conformity Assessment Bodies, as well as with normative documents adopted by the European and international accreditation organizations (EA, ILAC, IAF).

II. a) PHASE – ASSESSMENT OF THE CURRENT SITUATION AND IDENTIFICATION OF INITIAL RISK FACTORS

Based on interviews conducted with employees, taking into account normative and internal acts, previous experience and practice, feedback on stakeholder satisfaction, and other relevant sources, the Working Group identified initial risk factors and carried out an assessment of the current situation. In assessing the current situation, the Working Group also considered the annual reports of the Accreditation Body of Montenegro on the implementation of the Integrity Plan for the period 2023–2024, as well as the responses to the Questionnaire for Assessing the Efficiency and Effectiveness of the Integrity Plan (ATCG No. 15-802 of 23 August 2024).

The Working Group identified six key risk areas:

- **Leadership and Management**
- **Human Resources Policy, Ethical and Professional Conduct of Employees**
- **Financial Planning and Management**
- **Safekeeping and Security of Documents and Data**
- **Impartiality**
- **Anti-Corruption**

A detailed analysis of each of these risk areas is provided below:

1. Risk Area: Leadership and Management

1.1 Identification of Basic Risks Related to the Process “Leadership and Management”

With regard to the process of “Leadership and Management”, the Working Group identified the following key risks:

- Inadequate strategic planning of the institution’s activities;
- Deviations in the implementation of the institution’s development strategy;
- Undermining of principles and policies of operation, including inconsistent involvement of interested parties;
- Non-compliance with regulations and standards;
- Adoption of unlawful decisions;
- Inadequate supervision and control of work;
- Insufficient transparency.

1.2 Analysis of the Current Situation

The process of “**Leadership and Management**” generally consists of **planning, organizing, directing and controlling activities** in order to achieve the defined objectives of the organization. Responsibility for the implementation of this process lies with the top management of ATCG.

Planning:

ATCG does not have a formally adopted strategic document, i.e. a medium-term or long-term institutional development strategy. However, it has clearly defined elements of strategic development (mission, vision and general/strategic objectives), while short-term strategic planning of the institution’s activities is carried out through the preparation of annual Work Programmes.

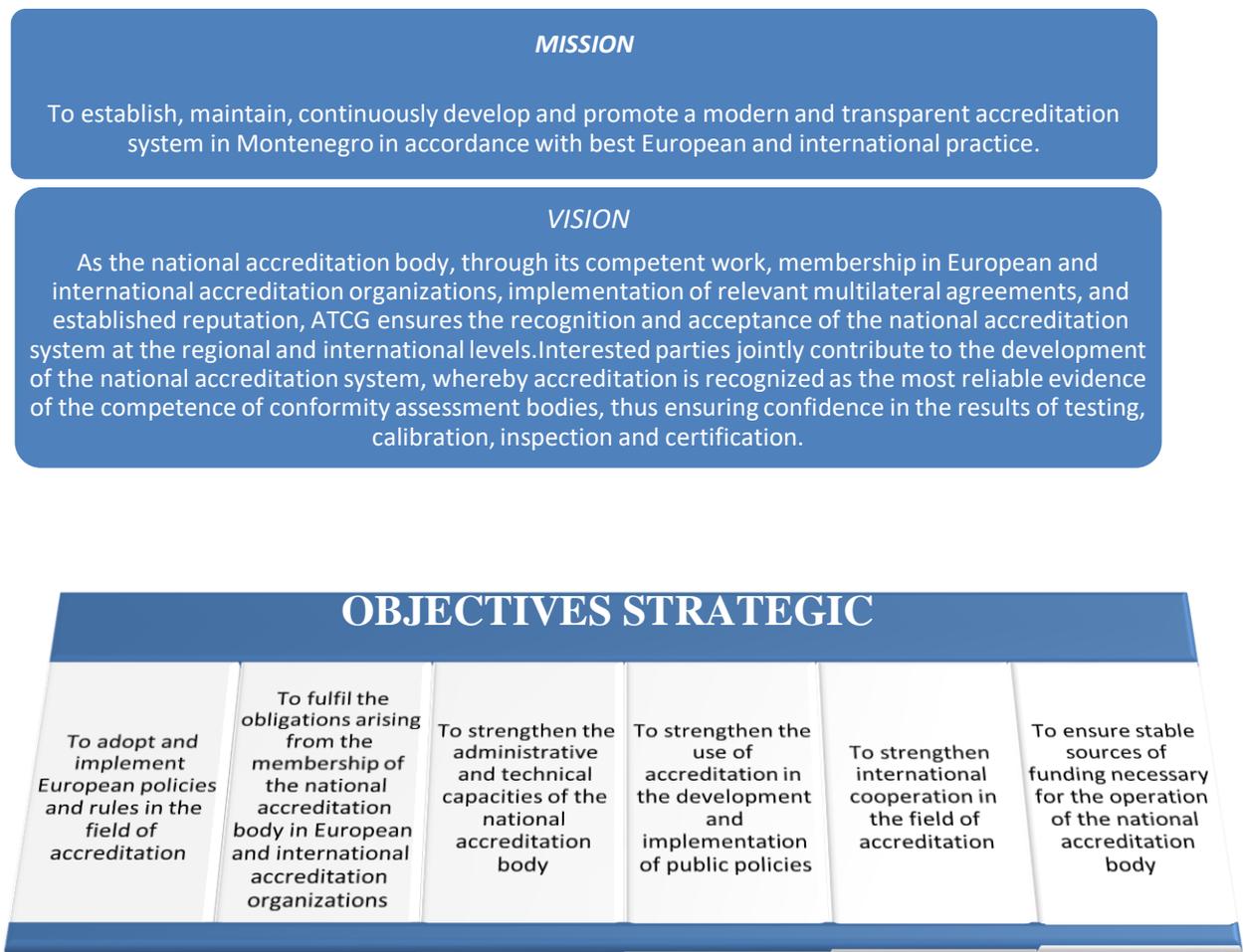


Figure 1 – Mission, Vision and General/Strategic Objectives of ATCG

In accordance with the Decision on Establishment, the Management Board, upon proposal of the Director and with the consent of the Government of Montenegro, adopts the annual Work Programmes of ATCG. The annual Work Programmes are publicly available on the ATCG website. The Working Group noted that in the previous period, the annual Work Programmes were largely adequate, development-oriented and adopted in a timely manner.

Attention should be paid to the following when preparing the annual Work Programme:

- *to take into account the financial resources approved by the State Budget Law for the respective financial year;*
- *to consult the heads of organizational units and, where necessary, other permanently employed staff;*
- *to ensure that measurable objectives (and indicators for measuring their achievement) are clearly defined and aligned with the general/strategic objectives;*
- *to ensure that the Annual Work Programme is adopted in a timely manner;*
- *to organize management meetings dedicated to monitoring the implementation of activities set out in the Work Programme.*

Organization

The bodies of ATCG are the Management Board, the Director and the Supervisory Board. The composition of these bodies, their responsibilities and powers, as well as their scope of work and methods of operation, are prescribed by the founding and internal acts of ATCG.

The internal organization of ATCG, in accordance with the Rulebook on Internal Organization and Systematization of Job Positions (March 2024), consists of two organizational units: the Accreditation Department and the Department for Development and International Cooperation.

The Accreditation Department comprises three divisions:

- Department for Accreditation of Laboratories;
- Department for Accreditation of Inspection Bodies;
- Department for Accreditation of Certification Bodies.

The Rulebook clearly prescribes qualification criteria and conditions for recruitment to specific job positions, as well as job descriptions and responsibilities of employees. Through individual Employment Contracts, employees are assigned to the respective job positions, thereby being informed of their duties and responsibilities. Internal ATCG documents (accreditation rules and management system procedures) further define the tasks and activities of permanently employed staff in relation to the accreditation process.

Within ATCG, advisory and expert bodies operate, such as: Accreditation Committee; Committee for Selection and Monitoring of Assessors; Technical Committees (for laboratories, inspection bodies and certification bodies); Complaints Committee; Appeals Committee. The composition of these bodies, their responsibilities and powers, as well as

their scope of work and methods of operation, are regulated in detail by ATCG internal acts (e.g. the Rulebook on the Establishment and Work of the Accreditation Committee). The Council for Accreditation is an advisory body of ATCG whose members include representatives of interested parties and which, inter alia, addresses issues relating to the preservation of the independence and impartiality of ATCG's work.

Attention should be paid to the following:

Considering that the views and opinions of interested parties are highly important for the work of ATCG, and given that the Council for Accreditation has been recently established, greater attention and support should be devoted to its work in the forthcoming period.

Assessors and technical experts (mostly externally engaged associates) provide ATCG with the technical basis and competence necessary for the assessment of conformity assessment bodies. ATCG assessors must meet the competence criteria prescribed by ATCG internal acts and adhere to the principles of independence, impartiality and objectivity. For each individual engagement of external assessors/experts, an appropriate Contract for Engagement in Assessment Activities is concluded.

Management (Directing)

ATCG is required to comply with the relevant laws and by-laws, the requirements of the international standard ISO/IEC 17011, as well as documents of mandatory application issued by European and international accreditation organizations. ATCG is obliged to continuously align its operations with any amendments to the aforementioned normative acts and the reference standard. The Rulebook on Internal Organization and Systematization of Job Positions of the Accreditation Body of Montenegro (March 2024) assigns responsibilities for monitoring changes in the above-mentioned documents.

Attention should be paid to the following:

Following any changes in normative documents and standards relating to the organization and operation of ATCG or to the implementation of the accreditation process, it is essential that such changes be timely incorporated into the general and internal acts of ATCG and that interested parties be informed of the changes, where relevant.

ATCG has established and documented a management system in accordance with the international standard MEST EN ISO/IEC 17011:2018 (ISO/IEC 17011:2017, identical adoption) and applies it in practice. Document PQ.00-2 – Quality Manual is the overarching document of the management system and makes reference to the accompanying management system procedures (currently 13 established procedures) and accreditation rules (currently 6 established accreditation rules). In this way, procedures for performing work processes within ATCG have been defined, with a clearly established system of responsibilities and process control.

Attention should be paid to the following:

In order to ensure the proper implementation of laws and by-laws relevant to ATCG's work, as well as ATCG's general and internal acts and management system documents, continuous training of ATCG personnel (permanently employed staff and externally engaged members of

ATCG bodies and committees) is necessary. Training is particularly important for newly engaged personnel.

The Director of ATCG has appointed a Management Representative for Quality responsible for establishing, developing and implementing the ATCG management system, as well as for reporting to top management on these matters.

For the purpose of safeguarding integrity, the Director of ATCG has appointed an Integrity Manager responsible for coordinating activities related to the preparation and implementation of the ATCG Integrity Plan, as well as for reporting to top management on this matter.

Monitoring

ATCG has established several mechanisms and levels of control and monitoring of its work. The work of permanently employed staff in performing regular duties is continuously monitored by their immediate supervisors. To date, no delays or irregularities have been identified in the performance of work tasks, and therefore no corrective measures have been required.

The scope of work and responsibilities of the Director of ATCG are defined by general and internal acts, as well as by internal management system procedures.

Attention should be paid to the following:

In every decision-making process, the Impartiality Policy adopted by the top management of ATCG should be taken into account. Whenever justified, appropriate mechanisms for limiting discretionary decision-making should be applied (e.g. establishment of committees for decision-making, etc.).

In accordance with the established management system and pursuant to procedure PR.04 Internal Audits, at least once a year an internal audit of the implementation of the management system is conducted by a team of qualified internal auditors. This audit primarily relates to compliance with the requirements of the international standard ISO/IEC 17011:2017 and other normative documents issued by European and international accreditation organizations (EA, ILAC, IAF).

In accordance with the established management system and pursuant to procedure PR.05 Management Review, at least once a year the top management of ATCG conducts a review of the implementation of the management system.

Pursuant to the Decision on Establishment, upon completion of each calendar year, the Management Board of ATCG (with the consent of the Government of Montenegro) adopts the Annual Activity Report of ATCG for the previous financial year, including the financial report.

Pursuant to the Decision on Establishment, upon completion of each calendar year, the Supervisory Board of ATCG supervises the legality of the work of ATCG bodies and reviews the business and financial reports for the previous financial year, and informs the Government of Montenegro accordingly.

Attention should be paid to the following:

Ensure compliance with the prescribed schedule for conducting internal audits of the management system, management reviews, and preparation of annual activity reports.

For the purpose of identifying potential irregularities and improving performance, ATCG continuously collects and reviews feedback through surveys completed by users of its services and other interested parties. The survey form (anonymous) is publicly available on the ATCG website. In addition, ATCG has established and applies a documented management system procedure, *PR.08 Procedure for Handling Complaints and Appeals*, in the event of complaints regarding its work or appeals against accreditation decisions. The complaint/appeal submission form is publicly available. The Working Group noted that feedback received through the survey has been positive and that there have been no complaints or appeals regarding the work of ATCG.

Attention should be paid to the following:

In the event of receiving complaints or appeals concerning ATCG's work, the prescribed procedure for their resolution should be applied within the defined timeframe and, where necessary, appropriate measures should be taken.

On the ATCG website (www.akreditacija.me), documents and information relating to the establishment and operation of ATCG, accreditation rules and procedures, accredited conformity assessment bodies with their scopes of accreditation, and other information of relevance to interested parties are publicly available.

Attention should be paid to the following:

Ensure regular updating of the ATCG website with current information regarding the organization and operation of ATCG and activities related to the accreditation of conformity assessment bodies. Information concerning ATCG's organization and activities should also be presented and promoted through round tables and other similar promotional activities.

2. Risk Area: Human Resources Policy, Ethical and Professional Conduct of Employees

2.1 Identification of Basic Risks Related to the Process “Human Resources Policy, Ethical and Professional Conduct of Employees”

With regard to human resources policy and the ethical and professional conduct of employees, the Working Group identified the following key risks:

- Inefficient and irrational human resources policy;
- Unlawful planning and implementation of recruitment procedures;
- Incompetent and unprofessional performance of duties;
- Unethical and unprofessional conduct of employees.

2.2 Analysis of the Current Situation

The process of human resources management generally **consists of analysing staffing capacities, planning and implementing recruitment, providing training, ensuring the**

professional and ethical conduct of employees during the work process, as well as monitoring and supervising employee performance.

Analysis of Staffing Capacities: Members of the Management Board (5 members) and the Supervisory Board (3 members) of ATCG are appointed by the Government of Montenegro in its capacity as Founder. The Management Board and the Supervisory Board are currently operating at full capacity.

The Director of ATCG is elected by the Management Board through a publicly announced competition, subject to the consent of the Government of Montenegro as Founder. The Director of ATCG is Ms. Anita Krulanović, who was appointed to this position on 11 October 2021.

The currently valid Rulebook on Internal Organization and Systematization of ATCG (March 2024) provides for a total of 17 job positions. ATCG currently employs 12 permanently employed staff members who perform exclusively professional and administrative tasks related to accreditation. It should be noted that other support services (e.g. accounting and bookkeeping services, IT maintenance, cleaning services, etc.) are outsourced. Appropriate contracts are concluded with external individuals/companies for the provision of such support services.

In relation to the scope of work and the number of accredited conformity assessment bodies, it can generally be stated that ATCG had a sufficient number of competent permanently employed staff in the previous period. However, in certain periods, employees were significantly overburdened with work tasks. Due to the increasing workload, there is a realistic need for future recruitment within ATCG.

Based on the analysis of existing staffing capacities, it has been concluded that at least three new employees should be recruited into permanent employment within the next two-year period. Activities in this regard should be undertaken as soon as possible (e.g. through planning of budgetary funds for these purposes, timely initiation and implementation of recruitment procedures, planning of training for newly recruited staff, etc.).

Attention should be paid to the following:

Taking into account the expected increase in workload in the forthcoming period, vacant positions should be filled in a timely manner to ensure a sufficient number of permanently employed staff and enable the smooth implementation of ATCG's business processes. Where necessary, when assigning employees to additional tasks, care should be taken to ensure an equitable distribution of work and responsibilities.

Within the organizational structure of ATCG, several expert and advisory bodies operate (e.g. the Council for Accreditation, Accreditation Committee, Complaints Committee, Appeals Committee, Committee for Selection and Monitoring of Assessors, Technical Committees). Their establishment, scope of work and operating procedures are clearly defined by the Statute of ATCG and the relevant rulebooks governing their establishment and work. Some members of these bodies are external associates of ATCG.

For the purpose of accrediting conformity assessment bodies, ATCG engages external assessors and technical experts with proven competence in the relevant field of accreditation. The Register of Assessors currently includes more than 100 registered assessors and technical experts who are engaged, as needed, in ATCG assessment teams. For each individual engagement, assessors/technical experts conclude a separate Contract for Engagement in Assessment Activities with ATCG. The Committee for Selection and Monitoring of Assessors is responsible for maintaining and updating the Register of Assessors.

Planning and Implementation of Recruitment: Since the beginning of 2023, four new employees have been recruited into permanent employment, to the following positions: Business Secretary, Adviser in the Department for Accreditation of Inspection Bodies, Adviser in the Department for Accreditation of Certification Bodies, and Administrative Assistant/Courier. Upon reviewing the planning and implementation of recruitment procedures in these cases, the Working Group concluded that the planning was adequate, i.e. that there was a genuine need for the respective engagements, that vacant positions existed in accordance with the valid Rulebook on Internal Organization and Systematization of Job Positions, and that the necessary financial resources had been secured in advance for these purposes. Public vacancy announcements were published for each of the aforementioned positions (with the participation of the Employment Agency of Montenegro in the process). The criteria for recruitment were clearly defined, and multiple candidates applied in each individual procedure. For each case, the Director of ATCG established a Selection Committee (all members of which had previously signed the Code of Ethics and a Declaration of Impartiality). The Committee evaluated the applications, conducted individual interviews with all candidates, and selected a candidate for further professional engagement. All other applicants were notified in writing of the outcome of the procedure, and no appeals were lodged following the selection. An Employment Contract was concluded with each selected candidate, specifying the position to which the employee was assigned and the job description of the respective systematized post.

Attention should be paid to the following:

For recruitment purposes, appropriate financial resources must be secured in a timely manner. Recruitment procedures should be conducted in accordance with the provisions of the Labour Law, in an impartial, objective and transparent manner.

Training : Given that the work of every national accreditation body is based on the competence of its personnel (both internal staff and externally engaged associates), ATCG places significant emphasis on their continuous professional development. Most permanently employed staff members have, during their previous ten-year engagement within ATCG, individually attended more than 50 training sessions related to the work of a national accreditation body and the accreditation of conformity assessment bodies. Some of these trainings were organized through EU-funded technical assistance projects.

At the end of each financial year, ATCG prepares a Training Plan for the following year (using a formalized template). The annual training plans are proposed by the Management Representative for Quality (following prior communication with the heads of organizational units) and approved by the Director of ATCG.

The Management Representative for Quality maintains and updates records of completed trainings, including information on participants, dates, organizers, type of training (internal/external), and records this information in the Training Plan template. A report on planned and completed trainings is presented by the Management Representative for Quality at the management review meeting conducted in accordance with procedure *PR.05 – Management Review*.

Upon review of training records for 2023 and the first half of 2024, it was established that more than 80% of the planned trainings were implemented. In addition to employees, members of ATCG bodies and committees, as well as external assessors/technical experts engaged by ATCG for the assessment of conformity assessment bodies, participated in these trainings.

To ensure the successful implementation of planned training activities, attention is drawn to the need for timely planning of financial resources for these purposes, taking into account that part of these funds may potentially be secured through EU pre-accession assistance funds or other sources (e.g. bilateral agreements on technical cooperation, regional projects, etc.). Furthermore, when planning future training activities, the needs and expectations of permanently employed ATCG staff, and where possible other interested parties, should always be taken into consideration.

Attention should be paid to the following:

For training and professional development purposes, adequate financial resources must be secured in a timely manner. Training should be planned systematically, taking into account the needs of permanently employed staff and externally engaged associates of ATCG.

Following implementation, the effectiveness of the training should be evaluated.

Ensuring Professional and Ethical Conduct of Employees: The provisions of the Labour Law apply to permanently employed ATCG staff, including, inter alia, provisions relating to employer obligations, rights and obligations of employees, employee liability, professional development, and prohibition of discrimination.

The prohibition of discrimination is regulated by the Law on Prohibition of Discrimination, which prescribes the prohibition of and protection against discrimination and promotes equality. The Working Group noted that, to date, there have been no reports or proceedings related to discrimination.

The Law on Prohibition of Workplace Harassment further regulates the rights, obligations and responsibilities of employers and employees regarding the prevention of workplace harassment and other issues relevant to protection against mobbing. The Working Group noted that ATCG has not appointed a mediator for cases of workplace harassment due to the fact that fewer than 30 employees are employed under employment contracts. It was also noted that there have been no reported cases of mobbing to date.

Pursuant to Article 49 of the Law on Prevention of Corruption, the Director of ATCG has appointed a person (from among permanently employed staff) responsible for receiving and handling whistleblower reports. The Working Group noted that there have been no whistleblower reports to date.

The top management of ATCG has adopted a Code of Ethics which is binding on all ATCG personnel (permanently employed staff and externally engaged associates). The Code of Ethics includes clauses relating to compliance with legal regulations, internal acts and ATCG documents, safeguarding the integrity of ATCG, and respecting impartiality, objectivity, competence, confidentiality and professional conduct. The Code of Ethics (ZPQ.00.03 – Declaration on Confidentiality of Data and Information and Compliance with the Code of Ethics) has been signed by all members of ATCG bodies and committees, all employees and externally engaged associates. ATCG maintains and regularly updates personnel files of all permanently employed staff, members of bodies and committees, and externally engaged associates, including decisions on their appointment (or engagement contracts), evidence of competence, and signed declarations on professional and ethical conduct, impartiality, independence and objectivity.

Attention should be paid to the following:

Ensure on a continuous basis that all newly employed and newly engaged external associates (members of governing, advisory and expert bodies) are informed of and sign the Declaration on Compliance with the Code of Ethics. For awareness-raising purposes, at least one annual training session should be planned and conducted for permanently employed and externally engaged ATCG associates on topics related to ethics, integrity and anti-corruption.

Externally engaged assessors/experts are required, for each individual engagement by ATCG, to sign a Contract for Engagement in Assessment Activities, which contains clauses on ethical and professional conduct, independence, impartiality and objectivity. By the relevant contractual provisions, the assessor declares that he/she is not a shareholder, investor or founder of the conformity assessment body being assessed and has had no business arrangement with it.

Monitoring and Supervision of Employee Performance: Given the relatively small number of employees, monitoring and control of employee performance in the execution of regular business activities is carried out continuously by competent managers and by the Director of ATCG. Periodic verification is also conducted regarding the possession of certificates and other evidence of competence necessary for the performance of duties defined in job descriptions. The Working Group noted that, to date, there has been no need to initiate disciplinary proceedings for breaches of work obligations.

Management system *procedure PR.10-1 – Procedure for Selection, Performance Monitoring and Maintenance of Competence of Assessors and Technical Experts* – inter alia, prescribes the method for monitoring the competence of externally engaged assessors/experts who perform assessment activities for the purpose of granting or maintaining accreditation.

Attention should be paid to the following: *It is of utmost importance to consistently and continuously adhere to procedure PR.10-1 when training candidates and selecting them for the status of ATCG assessors and technical experts. Following appointment, their competence must also be continuously monitored in accordance with the provisions of the procedure.*

ATCG maintains and regularly updates personnel files of permanently employed staff and externally engaged persons (members of ATCG bodies and committees, assessors and experts), containing documented evidence of their engagement and competence for the performance of assigned duties.

Attention should be paid to the following: Personnel files should be regularly and timely updated with new documents and information. Particular attention should be paid to feedback regarding the competence and professional and ethical conduct of permanently employed staff and externally engaged assessors/technical experts received from users of ATCG services.

3. Risk Area: Financial Planning and Management

3.1 Identification of Basic Risks Related to the Process “Financial Planning and Management”

With regard to financial planning and management, the Working Group identified the following potential key risks:

- Inadequate planning and execution of the budget;
- Non-compliance with the rules and procedures established by the Public Procurement Law;
- Untimely and inadequate reporting and auditing.

3.2 Analysis of the Current Situation

The process of financial planning and management generally consists of budget planning, planning, implementation and monitoring of public procurement, reporting on budget execution, and auditing.

Budget Planning: In accordance with the Law on Accreditation and the Decision on Establishment, ATCG is an independent non-profit organization that secures funds for its operation from the State Budget of Montenegro, accreditation fees, and other sources.

Funds allocated from the State Budget of Montenegro are intended for the regular operation of ATCG and the implementation of activities prescribed by the annual Work Programme (including the payment of membership fees and participation of ATCG representatives in the work of European/international accreditation organizations).

The costs of the accreditation procedure for conformity assessment bodies are charged in accordance with the Decision on the Amount of Accreditation Fees, adopted by the Management Board of ATCG (with prior consent of the Government of Montenegro). This Decision is publicly available on the ATCG website. Funds from other sources may include grants or donations; however, in order to avoid conflicts of interest, ATCG may not accept gifts or donations from users of its services (conformity assessment bodies).

In principle, during the third quarter of each financial year, and upon request of the competent ministry (Ministry of Economic Development), the Director of ATCG (following

prior consultation with management staff and communication with the Management Board) prepares and submits to the competent ministry a draft budget proposal for the following year, accompanied by explanatory notes. In doing so, consideration is given to the funds allocated for the current year as well as to the activities planned for implementation in the upcoming financial year. The Working Group noted that, in the previous period, ATCG submitted the draft budget proposal for the following year to the competent ministry in a timely manner, including explanations of specific budget items.

Attention should be paid to the following:

Continue the practice of involving heads of departments and, where necessary, divisions in the planning and preparation of the annual budget. In doing so, take into account the budgetary funds allocated for the previous year as well as all activities planned for the relevant financial year (including public procurement).

The Rulebook on Salaries and Other Employee Benefits in ATCG (ATCG No. 01-560 of 31 July 2018), adopted by the Management Board of ATCG (with prior positive opinion of the ministry responsible for finance), further regulates the method of determining and exercising the right to salary, salary compensation and other benefits of ATCG employees, in accordance with the Labour Law, the General Collective Agreement and the Law on Salaries of Employees in the Public Sector.

Planning, Implementation and Monitoring of Public Procurement: ATCG conducts public procurement activities in compliance with the provisions of the Public Procurement Law.

For the implementation of public procurement activities, ATCG engages a competent external person in the capacity of Public Procurement Officer. The engaged external person holds a Level VII-1 qualification under the national qualifications framework and a certificate of passing the professional examination for public procurement activities. An appropriate Contract for Engagement was concluded with the Public Procurement Officer, followed by a formal Decision on Appointment.

In order to safeguard impartiality within the scope of his/her work, the Public Procurement Officer signed a Declaration of Impartiality (form ZPQ.00.05). ATCG timely informed the ministry responsible for finance about the appointed Public Procurement Officer.

Attention should be paid to the following: *Given that accounting and bookkeeping services, as well as public procurement officer duties, are externally outsourced, in the forthcoming period consideration should be given to the possibility of systematizing a position and employing a permanently engaged staff member to perform these tasks.*

In the previous period, upon proposal of the Director of ATCG, the Management Board adopted the Public Procurement Plan for the current year in a timely manner, which was subsequently published within the prescribed deadline on the CeJN portal (e.g. the Public Procurement Plan for 2024 was published on 30 January 2024 under reference number 19188).

For procurement of goods and services up to EUR 4,000.00, in accordance with the Rulebook on the Implementation of Simple Procurements, purchases were made based on an invoice or a concluded contract. For procurement of goods and services from EUR 4,000.00 to EUR 8,000.00, procurement was carried out based on a concluded contract.

Simple procurements exceeding EUR 8,000.00 were conducted by publishing the procedure in the CEJN system, in accordance with the Rulebook on the Implementation of Simple Procurements, thereby ensuring full transparency of these procedures.

On the CeJN website, information (under the menu “Exemptions from the Application of the Law”) relating to simple procurements below EUR 8,000.00 for goods and services was regularly updated, including the reference number of the invoice, type of subject matter, contracted value, description of the procurement, value with and without VAT, supplier, and date of execution.

In the previous period, in accordance with the Public Procurement Law, ATCG submitted to the Ministry of Finance, within the prescribed deadlines, the Methodology for Risk Analysis in the Performance of Control in Public Procurement Procedures, as well as the Records on Conflict of Interest and Violations of Anti-Corruption Rules. ATCG also prepared and submitted to the Ministry of Finance, in a timely manner, reports on conducted procurements and concluded contracts/invoices for simple procurements, as well as semi-annual and annual public procurement reports within the deadlines prescribed by law.

Attention should be paid to the following: Continue with the consistent application of the Public Procurement Law in the planning, implementation and reporting of public procurement procedures.

Reporting on Budget Execution : No later than the end of March of the current year, the Director of ATCG, pursuant to Article 15 of the Statute, submits to the Management Board a report on the implementation of the Work Programme and on the financial operations of ATCG for the previous financial year. In accordance with Article 10 of the Decision on Establishment, after consideration and adoption of the report, the Management Board submits (through the competent ministry) to the Government of Montenegro, for approval, the Annual Activity Report of ATCG together with the accompanying financial statements (balance sheet, income statement, statistical annex and closing sheet).

The Annual Activity Reports of ATCG (without financial statements) are publicly available on the ATCG website, while the accompanying financial statements are publicly available on the portal of the Revenue and Customs Administration of Montenegro (TAXIS portal).

Attention should be paid to the following: Continue with timely and transparent reporting on budget execution.

Audit: Based on funds approved by the State Budget of Montenegro for the current financial year, as well as projected revenues from accreditation fees, the Management Board of ATCG (upon proposal of the Director) adopts the annual Work Programme of ATCG and submits it to the Government of Montenegro for approval. Annual Work Programmes are publicly

available on the ATCG website. Pursuant to Article 12 of the Statute, the Director of ATCG decides on the allocation and use of ATCG funds in accordance with the law.

Given that, pursuant to Article 14 of the Decision on Establishment, the Supervisory Board performs oversight of the legality of the work of ATCG bodies and reviews business and financial reports, it may be considered that this body performs internal audit functions. At the session held on 21 December 2023, the Government of Montenegro adopted the Report of the Supervisory Board on the Work of the Accreditation Body of Montenegro for 2022 and took note of the accompanying recommendations of the Supervisory Board.

Through a contractual arrangement, ATCG subcontracts bookkeeping and accounting services to a competent legal entity. The subcontractor is obliged to comply with the Accounting Law, sign and adhere to the ATCG Code of Ethics (form ZPQ.00.03), and sign a Declaration on Confidentiality and Data Protection (form ZPQ.00.06).

For the purpose of identifying, analysing and managing risks related to its operations and the implementation of accreditation procedures, ATCG has established and applies procedure PR.07-1 Risk Management. Risks related to ATCG's financial stability are also included in the Risk Register (form ZPR.07.01-1) and are regularly monitored and managed.

For the purpose of internal control, ATCG has established and applies internal audit mechanisms (procedure PR.04 – Internal Audit) and management review mechanisms (procedure PR.05 – Management Review). Internal audits and management reviews are conducted at least once a year. Although internal control measures and mechanisms are implemented in a clearly prescribed and adequate manner, the Working Group identified a shortcoming in that ATCG failed to submit to the competent ministry the annual report on activities related to the implementation and improvement of management and internal controls (in accordance with Article 18 of the Law on Management and Internal Controls in the Public Sector).

Attention should be paid to the following: Regularly maintain and update the Risk Register (form ZPR.07.01-1), including risks related to ATCG's financial stability. Apply other internal control mechanisms (e.g. internal audits, management reviews, etc.). Submit annual reports on activities related to the implementation and improvement of management and internal controls to the competent ministry within the legally prescribed deadlines.

4. Risk Area: Safekeeping and Security of Documents and Data

4.1 Identification of Basic Risks Related to the Process “Safekeeping and Security of Documents and Data”

With regard to the safekeeping and security of documents, information and data, the Working Group identified the following potential key risks:

- Inadequate formal and practical data protection mechanisms;
- Negligent handling of documentation;
- Misuse of confidential official data and information concerning service users;
- Untimely handling of requests for free access to information.

4.2 Analysis of the Current Situation

The process of protecting documents and data generally **consists of planning measures, implementing measures, and monitoring the effectiveness of undertaken measures** to ensure the safekeeping and security of documents, information and data.

Planning of Activities for the Safekeeping and Security of Documents, Information and Data : Within regular collegium meetings attended by ATCG management, initiatives may be launched to undertake additional specific measures aimed at improving the protection and security of documents and data. If such an initiative is considered justified, it is subsequently discussed in detail at a dedicated management meeting, where necessary activities are analysed and defined, required resources are assessed and planned, responsibilities are assigned, and deadlines for implementation are established.

Implementation of Measures for the Safekeeping and Security of Documents and Data: ATCG has implemented several measures and established mechanisms to ensure the protection of documents and data.

The Working Group noted that all members of ATCG bodies, expert and advisory committees, as well as permanently employed staff, have signed the Declaration on Confidentiality of Data and Information (form ZPQ.00.03). All other externally engaged associates of ATCG (e.g. representatives of IT service providers, accounting service providers, cleaning service providers) have signed an individual Declaration on Confidentiality and Data Protection (form ZPQ.00.06).

***Attention should be paid to the following:** Upon recruitment of new employees or engagement of new external associates, they must be informed of and required to sign the Declaration on Confidentiality and Data Protection. The same applies to external service providers engaged under service contracts. During collegium meetings and meetings of governing, expert and advisory bodies, members should be reminded of the importance of and obligation to safeguard confidential data and information.*

Furthermore, externally engaged assessors and technical experts, for each individual engagement by ATCG, sign a Contract for Engagement in Assessment Activities, which, inter alia, contains clauses concerning the obligation to maintain confidentiality of data and information obtained during assessments.

***Attention should be paid to the following:** Continue with this practice when engaging assessors/technical experts.*

In the overarching management system document PQ.00-2 Quality Manual, it is prescribed that ATCG shall not disclose confidential information and data obtained during the accreditation process of conformity assessment bodies to third parties without prior written consent of the conformity assessment body, except where disclosure is required by law. In accordance with document PA.01 – Accreditation Rules and procedure PR.01-2 – Assessment of Conformity Assessment Bodies, before initiating the accreditation procedure, ATCG is required to conclude a legally binding arrangement (Accreditation Agreement) with the conformity assessment body, defining mutual rights and obligations in the accreditation

process. Certain clauses of this Agreement relate to the obligation to safeguard data and information obtained during the accreditation process.

Attention should be paid to the following: *Continue with this practice when concluding Accreditation Agreements with clients.*

Management system document *PR.02-1 – Control of Documents and Records* prescribes the procedure for drafting and approving documents, defines document structure, regulates document revision, distribution and withdrawal of obsolete versions, document identification and marking, etc. This procedure also includes control mechanisms necessary for identification, storage, protection, retrieval, retention time and distribution of management system records.

Attention should be paid to the following: *Continue with the consistent application of procedure PR.02-1 governing document and record control. A gradual transition to an electronic document management system is recommended; therefore, activities should be initiated to establish and implement an appropriate software solution for document and record management.*

All incoming and outgoing official correspondence is registered in a unified manner through the archive by the designated archivist, after which internal distribution is carried out. Paper-based official correspondence is stored partly in the ATCG archive (for the last two years) and partly in the premises of a specialized company providing archiving, storage and document retention services, with which ATCG has concluded an appropriate contract. An electronic version of the aforementioned documentation is available to employees through a dedicated application.

ATCG has implemented appropriate security measures to prevent unauthorized access to its internal computer network. Access to individual computers used by ATCG employees is protected by personal login credentials (username and password). Electronic data held by ATCG are regularly backed up. Antivirus software is installed on all computers.

Attention should be paid to the following: *Established measures for the protection of electronic data should be continuously applied and upgraded. Employees should also receive regular training on handling electronic data and applying appropriate data protection measures.*

In accordance with its founding acts, the work of ATCG is public. Transparency is ensured through the publication of general acts, work programmes, activity reports and other information of relevance to interested parties on the website (www.akreditacija.me), through publications and media presentations, depending on their significance.

On the other hand, Article 28 of the Statute stipulates that business secrets include documents and data relevant to the operations of ATCG, the disclosure of which could result in harmful consequences for ATCG's operations and reputation, as well as for participants in the accreditation process.

In accordance with the Law on Data Secrecy and the Law on Free Access to Information, ATCG has adopted and publicly published the Guide to Access to Information Held by the Accreditation Body of Montenegro, which further defines the data considered to be business secrets, as well as the manner of their storage and disclosure.

***Attention should be paid to the following:** The Guide to Access to Information Held by the Accreditation Body of Montenegro should be regularly reviewed and revised where necessary. In the event of receiving a request for access to information, attention should be paid to the legally prescribed deadlines for responding to such requests.*

The Working Group noted that the processing of personal data is carried out in accordance with the Law on Personal Data Protection (e.g. contracts concluded with individuals during the 2023 election campaign were publicly published on the ATCG website, with the personal identification numbers redacted in order to protect personal data).

***Attention should be paid to the following:** Continue the consistent application of the provisions of the Law on Personal Data Protection.*

Monitoring the Effectiveness of Measures Related to the Safekeeping and Security of Documents and Data: The effectiveness of implemented measures is regularly monitored. If, during regular operations, any issue that could potentially jeopardize the security of documents and data is identified, employees are obliged to report it immediately. Furthermore, users of accreditation services (conformity assessment bodies) and other interested parties may submit complaints regarding the work of ATCG, which ATCG is obliged to handle in accordance with management system procedure PR.08 – Handling of Complaints and Appeals. Issues related to potential data leaks may also be indicated through anonymous surveys, which are permanently available on the ATCG website.

The Working Group noted that in the previous period there were no recorded cases of document loss or information leakage.

5. Risk Area: Impartiality

5.1 Identification of Basic Risks Related to the Process “Safeguarding Impartiality”

With regard to safeguarding impartiality, the Working Group identified the following potential key risk:

- Biased conduct and conflict of interest.

5.2 Analysis of the Current Situation

In accordance with its founding acts, ATCG is an independent non-profit organization established by the Government of Montenegro. Its activities are defined by Article 5 of the Law on Accreditation, Article 5 of the Decision on Establishment and Article 7 of the Statute, and differ from the activities of other state authorities and institutions. The core activity of ATCG relates to determining the competence of bodies performing conformity assessment activities.

Pursuant to Article 6 of the Law on Accreditation, and in order to safeguard impartiality and avoid conflicts of interest, ATCG may not provide other services to conformity assessment bodies, including consultancy services; may not have ownership or management rights or other financial interests in conformity assessment bodies; and may not act in competition with conformity assessment bodies. ATCG does not state or imply that accreditation would be simpler, easier, faster or less expensive if any particular person or consultancy service is used.

ATCG policies and procedures ensure that conformity assessment bodies are treated in a non-discriminatory manner. Accreditation is not conditioned on the type of conformity assessment body (public or private), its size, or its membership in any association or group. Accreditation is also not conditioned on the number of already accredited conformity assessment bodies.

ATCG has made its services (ZPQ.00.01 Catalogue of Services) available to all interested parties and applicants for accreditation under equal conditions. Accreditation criteria (ZPR.01.27-1 List of Documents Containing Requirements to be Fulfilled by the Applicant for Accreditation and the Accredited CAB) are transparent and publicly available on the ATCG website. The Decision on the Amount of Accreditation Fees is also publicly available.

Top management has documented and demonstrated its commitment to the principle of impartiality through the Impartiality Policy (*ZPQ.00.04 Statement of Impartiality*).

All ATCG personnel (permanently employed staff, members of governing and expert bodies, and assessors) who may influence accreditation activities and accreditation decisions act objectively and are free from any commercial, financial or other pressures that could compromise their impartiality. Permanently employed and externally engaged personnel (members of governing and expert bodies) have signed the Declaration of Impartiality (*ZPQ.00.05 Individual Declaration of Impartiality*), committing themselves to act impartially in any phase of the accreditation process and to avoid any potential conflict of interest.

Externally engaged assessors/technical experts are required, for each individual engagement, to sign a Contract for Engagement in Assessment Activities containing a clause on impartiality and objectivity. Among other provisions, the assessor declares independence from the activity being assessed and freedom from influence and conflicts of interest, and commits to performing the contracted work without bias or prejudice.

When selecting an assessment team, ATCG ensures that the conformity assessment body under assessment may request replacement of a team member in order to avoid a potential conflict of interest and ensure the impartiality of the assessment team. After each on-site assessment, the conformity assessment body completes a survey evaluating the performance of the ATCG assessment team.

Attention should be paid to the following: Upon recruitment of new employees or engagement of new external associates, they must be informed of ATCG's policy on impartiality and required to sign the Declaration of Impartiality. The same applies when concluding contracts with externally engaged assessors/technical experts. Permanently

employed staff and externally engaged associates should be regularly reminded of the obligation to avoid conflicts of interest and safeguard impartiality.

ATCG has ensured that the activities of related bodies do not compromise the confidentiality, objectivity and impartiality of its accreditation activities. With the participation of interested parties, ATCG identifies, analyses and documents relationships with such bodies and determines potential conflicts of interest, whether arising within the accreditation body or in the activities of related bodies. When a conflict of interest is identified, appropriate measures are taken. The analysis of ATCG's relationships with related bodies is regularly updated and publicly available on the ATCG website.

In accordance with management system procedure PR.07-1 Risk Management, ATCG continuously conducts activities related to the identification, analysis and evaluation of risks to impartiality and other aspects of its work, and, where necessary, undertakes appropriate measures to eliminate or reduce them to an acceptable level. The Risk Register (ZPR.07.01), which currently includes more than 10 risks related to impartiality among other risks, is analysed with the participation of interested parties and is subject to management review. If an unacceptable risk to impartiality is identified that cannot be reduced to an acceptable level, ATCG will not provide accreditation services.

Attention should be paid to the following: *In order to monitor potential conflicts of interest and threats to impartiality, regularly analyse ATCG's relationships with related bodies and conduct identification, analysis and management of risks related to the impartiality of ATCG's work and the implementation of accreditation procedures.*

ATCG has established and publicly published procedure PR.08 – Procedure for Handling Complaints and Appeals, together with the relevant forms (ZPR.08.01 Complaint Submission Form and ZPR.08.03 Appeal Submission Form). Conformity assessment bodies may at any time submit an appeal to ATCG against any unfavourable decision taken during the accreditation process, while any interested party may submit a complaint regarding ATCG's operations and activities. Complaints and appeals may, inter alia, relate to impartiality and conflicts of interest during the accreditation process or decision-making. The Working Group noted that, to date, ATCG has not received complaints or appeals related to the objectivity and impartiality of assessment teams or accreditation decision-making bodies (Accreditation Committee).

Attention should be paid to the following: *Upon receipt of a complaint or appeal, promptly initiate its resolution in accordance with procedure PR.08 and inform the submitter of the outcome.*

ATCG has published on its website a customer satisfaction survey form regarding the services provided, and feedback is regularly analysed and reviewed for the purpose of improving ATCG's operations.

The Council for Accreditation is an advisory body composed of representatives of interested parties. Among other responsibilities, it provides opinions on potential conflicts of interest or threats to the independence and impartiality of ATCG.

Attention should be paid to the following: Issues related to potential conflicts of interest, independence and impartiality of ATCG (including impartiality in the implementation of accreditation procedures) should be referred to the Council for Accreditation for consideration, consultation and obtaining the opinion of interested parties.

6. Risk Area: Anti-Corruption

6.1 Identification of Basic Risks Related to the Process “Prevention of Corruption”

With regard to corruption prevention, the Working Group identified the following potential key risks:

- Failure to report corruption and other unlawful activities;
- Failure to submit reports on the income and assets of public officials;
- Acceptance of prohibited gifts or other undue benefits;
- Failure to report data on sponsorships and donations.

6.2 Analysis of the Current Situation

Corruption is any abuse of official, business or social position or influence for the purpose of obtaining personal gain or gain for another person.

In accordance with the founding acts, members of the Management Board and the Supervisory Board of ATCG are appointed and dismissed by the Government of Montenegro as the Founder. The Director of ATCG is appointed by the Management Board through a public competition, subject to the consent of the Government of Montenegro. These persons are considered public officials and are subject to the relevant provisions of the Law on Prevention of Corruption.

The Working Group noted that the Director of ATCG and members of the Management Board and Supervisory Board have submitted asset and income reports to the Agency for the Prevention of Corruption (hereinafter: the Agency) within the legally prescribed deadlines. To date, the Agency has not initiated any proceedings for violations of the Law in this regard.

Attention should be paid to the following: Continue the timely submission of asset and income reports of public officials.

In accordance with Article 22 of the Law on Prevention of Corruption, ATCG regularly submits to the Agency, by the end of March of the current year for the previous year, a Report on Received Sponsorships and Donations. The Working Group noted that in the previous period ATCG did not receive any gifts, sponsorships or donations.

Attention should be paid to the following: Continue the timely submission of reports on received gifts, sponsorships and donations.

Following notification by the Agency regarding the implementation of the Law on Financing of Political Entities and Election Campaigns, ATCG has regularly published and submitted

relevant information to the Agency to ensure transparency in the use of public resources during election campaigns.

Attention should be paid to the following: *During election campaigns, ensure timely submission and publication of relevant information in order to guarantee transparency in the use of public resources.*

ATCG has appointed a person responsible for handling corruption reports and whistleblower protection (ATCG No. 13-542 of 02 September 2022). In the event of a corruption report, this person is required to act in accordance with the Rulebook on the Detailed Procedure for Handling Whistleblower Reports on Threats to the Public Interest Indicating the Existence of Corruption. In the previous period, there were no whistleblower reports within ATCG.

Attention should be paid to the following: *Introduce the practice of regularly addressing corruption prevention as a topic at collegium meetings and meetings of ATCG bodies and committees. Upon receipt of a whistleblower report, act in accordance with the Rulebook on the Detailed Procedure for Handling Whistleblower Reports.*

For the purpose of corruption prevention, and in accordance with the Law on Prevention of Corruption, ATCG adopts Integrity Plans within the prescribed deadlines, which are publicly available on the ATCG website. The Integrity Plan is also submitted to the Agency in accordance with the prescribed procedure. No later than 15 April of the current year, ATCG submits to the Agency an annual report on the implementation of the Integrity Plan for the previous year. These reports are submitted to the Agency in a timely manner and are publicly available on the ATCG website.

The Working Group noted that the Director of ATCG appointed an Integrity Manager (ATCG No. 15-732 of 01 August 2024), whose responsibilities include coordinating and participating in the preparation of the Integrity Plan, implementing and monitoring prescribed measures, and reporting on the implementation of the Integrity Plan.

II. b) PHASE – ASSESSMENT OF EXPOSURE TO RISKS

Following the analysis of the current situation (including existing measures), the identification of key risk areas and specific risks related to those areas, the Working Group, in communication with employees, carried out the identification, analysis and evaluation of residual risks related to potential impairment of ATCG's integrity. When evaluating residual risks, the methodology described in Section 4 of this document was applied.

The Working Group prepared a proposal of measures aimed at eliminating or reducing to the lowest possible level the identified residual risks.

III PHASE – ACTION PLAN FOR ENHANCING THE LEVEL OF INTEGRITY

At the ATCG collegium meeting held on 27 August 2024, the Working Group's proposal of measures for eliminating/reducing residual risks to the lowest possible level was reviewed. In addition to the proposed measures, responsibilities and deadlines for their implementation were determined.

After collecting all relevant information, the Integrity Manager initiated the completion of the Integrity Plan form on 29 August 2024 via the electronic platform of the Agency for the Prevention of Corruption. The form was completed on 04 September 2024.

The newly developed Integrity Plan, together with improvement measures (see Section 5 of this document), was adopted on 06 September 2024 by the Director of ATCG (ATCG No. 15-853 of 06 September 2024), and was subsequently submitted electronically to the Agency for the Prevention of Corruption via its electronic platform.

4. METHODOLOGY FOR ASSESSING RISK INTENSITY

For identified risks to integrity, the Accreditation Body of Montenegro has adopted the following methodology for assessing and monitoring risk intensity:

Risk Intensity Assessment

Risk intensity is determined by multiplying the likelihood and the consequence, using the risk matrix “Likelihood (1–10) × Consequence (1–10)” shown in the figure below.

CONSEQUENCE	major	10									
		9									
		8									
	moderate	7									
		6									
		5									
	minor	4									
		3									
		2									
		1	2	3	4	5	6	7	8	9	10
Risk Intensity		low			medium			high			
(Consequence × Likelihood)		LIKELIHOOD									

Risk intensity may range from 1 to 100. Scores from 1–15 represent the *lowest likelihood* of corruption or other forms of integrity breaches occurring, with a *very minor* consequence (**low-intensity risk**). Scores from 16–48 represent a *medium likelihood* of corruption or other forms of integrity breaches occurring, with a *moderate* consequence (medium-intensity risk). Scores from 49–100 indicate an *almost certain likelihood* of corruption or other forms of integrity breaches occurring, with a *very severe* consequence (**high-intensity risk**).

Legend:

Risk Assessment:	low	medium	high
	1-15	16-48	49-100

- **/L Low-Intensity Risk** – There is a low likelihood that corruption or other forms of integrity breaches will occur in this process, due to existing control measures.
- **/M Medium-Intensity Risk** – The occurrence of corruption or other forms of integrity breaches in this process is possible; however, the risk is managed through control measures.
- **/H High-Intensity Risk** – Corruption or other forms of integrity breaches are already present in this process or are very likely to occur.

Risk Monitoring

For all identified risks related to corruption or other forms of integrity breaches—particularly those classified as medium- and high-intensity risks—appropriate actions (measures) are undertaken to eliminate them or reduce them to the lowest possible level.

Risks are monitored on a regular basis. Changes in risk status compared to the previous assessment are indicated as follows: ↔ No change ; ↑ Increased risk; ↓ Decreased risk.

Legend:

Progress since the Previous Assessment	No Change	Increased Risk	Decreased Risk
	↔	↑	↓

Date of Review:

Review Conducted by:

5. INTEGRITY PLAN TEMPLATE

The Integrity Plan of the Accreditation Body of Montenegro for the period 2025–2026 is attached to this document, using the template prescribed by the Agency for the Prevention of Corruption.

6. DECISION ON THE ADOPTION AND ENTRY INTO FORCE OF THE INTEGRITY PLAN

Na osnovu čl. 75 stav 1 Zakona o sprječavanju korupcije ("Službeni list Crne Gore", br. 54/2024 od 11.06.2024), čl. 12 Odluke o osnivanju Akreditacionog tijela Crne Gore ("Službeni list RCG", br. 21/07) i člana 14 Statuta Akreditacionog tijela Crne Gore, donosim:

ODLUKU
o usvajanju Plana integriteta Akreditacionog tijela Crne Gore za dvogodišnji period 2025-2026. godine

AKREDITACIONO TIJELO
Crne Gore – Podgorica
06. 09. 2024
br. 15-853 br.

1. Usvaja se Plan integriteta Akreditacionog tijela Crne Gore za period 2025-2026. godine.
2. Zadužuje se Menadžer integriteta da, u skladu sa čl. 81 Zakona o sprječavanju korupcije, najkasnije do 01. aprila tekuće godine sačini i podnese direktoru ATCG pisani izvještaj o realizaciji mjera iz Plana integriteta za predhodnu godinu.
3. Zadužuju se svi zaposleni u Akreditacionom tijelu Crne Gore da na zahtjev Menadžera integriteta dostave sve potrebne informacije i dokumenta neophodna za efikasno sprovođenje Plana integriteta.

Obrazloženje

Članom 75 Zakona o sprječavanju korupcije ("Službeni list Crne Gore", br. 54/2024 od 11.06.2024) propisano je da organ vlasti donosi Plan integriteta koji sadrži mjere kojima se sprečavaju i otklanjaju mogućnosti za nastanak i razvoj korupcije i obezbjeđuje povjerenje građana u njihov rad.

Plan integriteta donosi se u skladu sa pravilima za izradu i sprovođenje Plana integriteta koja donosi Agencija za sprječavanje korupcije.

S tim u vezi, Rješenjem ATCG br. 15-732 od 01.08.2024. godine određeno je odgovorno lice za izradu i sprovođenje Plana integriteta (Menadžer integriteta), dok je Rješenjem ATCG br. 15-732/1 od 01.08.2024. godine formirana Radna grupa za pripremu nacrtu Plana integriteta Akreditacionog tijela Crne Gore za period 2025-2026.

Radna grupa je pripremila i dana 05.09.2024. godine direktorici Akreditacionog tijela dostavila na odobravanje i usvajanje konačni prijedlog Plana integriteta za period 2025-2026. godine, a koji je u cjelosti prihvaćen.

Na osnovu izloženog riješeno je kao u dispozitivu ove odluke.

Odluka stupa na snagu danom donošenja.

PRAVNA POUKA: Protiv ove odluke može se izjaviti žalba nadležnoj Komisiji za žalbe u roku od 8 dana od dana objave iste.

Direktorica Akreditacionog tijela Crne Gore

Anita Krulanić



Dostaviti:

- na oglasnoj tabli
- Agenciji za sprječavanje korupcije
- Arhivi

Plan integriteta

Akreditaciono tijelo Crne Gore

REGISTAR RIZIKA			PROCJENE I MJERENJE RIZIKA				REAGOVANJE NA RIZIK			PREGLED I IZVJEŠTAVANJE O RIZICIMA		
Oblasti rizika	Radna mjesta	Osnovni rizici	Postojeće mjere kontrole	Preostali rizici (rezidualni)	Vj er.	Poslj ed ice	Pr ocj ena	Predložene mjere za smanjenje/otklanjanje rizika	Ogovorna osoba	Rok	St.	Kratak opis i ocjena realizacije mjere
1.1 Rukovođenje i upravljanje	upravni odbor direktor rukovodilac službe	Neadekvatno strateško planiranje rada institucije	zakoni i podzakonska akta interna akta institucije misija, vizija i opšti ciljevi institucije godišnji programi rada institucije	Za sprovođenje godišnjeg Programa rada nijesu obezbijedena adekvatna finansijska sredstva. Godišnji program rada odstupa od utvrđene misije, vizije i strateških ciljeva. Godišnji program rada ne sadrži jasno definisane mjerljive ciljeve. Neblagovremeno donošenje godišnjeg Programa rada.	3	8	24	Prilikom izrade i donošenja godišnjeg Programa rada ATCG uzeti u obzir finansijska sredstva opredijeljena Zakonom o budžetu za predmetnu poslovnu godinu	upravni odbor direktor	kontinuirano, za svaku poslovnu godinu	↔	
								Prilikom izrade godišnjeg Programa rada ATCG konsultovati rukovodioce organizacionih jedinica (službi), a po potrebi i drugo stalno zaposleno osoblje	direktor	kontinuirano, za svaku poslovnu godinu		
								Obezbijediti da su mjerljivi ciljevi (i indikatori na osnovu kojih će se mjeriti ispunjenost ovih ciljeva) jasno definisani i usklađeni sa opštim/strateškim ciljevima	direktor rukovodilac službe	kontinuirano, za svaku poslovnu godinu		
							Izradu i donošenje godišnjeg Programa rada ATCG sprovesti odmah po stupanju na snagu Zakona o budžetu za predmetnu	upravni odbor direktor	31. januar tekuće godine			

						poslovnu godinu		31. januar tekuće godine		
1.2 Rukovođenje i upravljanje	upravni odbor direktor rukovodilac službe	Odstupanje u sprovođenju strategije razvoja institucije	zakoni i podzakonska akta interna akta institucije godišnji programi rada institucije	Neadekvatno praćenje realizacije godišnjeg Programa rada	3 8 24	Najmanje jednom kvartalno organizovati sastanke kolegijuma ATCG, a najmanje jednom polugodišnje sastanke Upravnog odbora ATCG sa temom realizacije aktivnosti iz Programa rada ATCG za tekuću godinu	upravni odbor direktor rukovodilac službe rukovodilac odjeljenja	kontinuirano	↔	
1.3 Rukovođenje i upravljanje	upravni odbor direktor eksterno angažovani članovi upravljačkih, savjetodavnih i stručnih tijela ATCG svi zaposleni	Narušavanje načela i politike rada, nedosljedno uključivanje zainteresovanih strana	zakoni i podzakonska akta interna akta institucije interna pravila i procedure Sistem menadžmenta uspostavljen prema međunarodnom standardu ISO/IEC 17011:2017	Nepoznavanje ili neadekvatna primjena opštih i internih akata, kao i dokumenata sistema menadžmenta ATCG (Politika kvaliteta, Poslovnik o kvalitetu, prateće procedure i uputstva) Nedovoljno uključivanje zainteresovanih strana u rad ATCG	3 8 24	Sprovesti edukaciju osoblja ATCG (stalno zaposlenih i eksterno angažovanih članova organa i tijela ATCG) u vezi sa važećim opštim i internim aktima, zahtjevima međunarodnog standarda ISO/IEC 17011, kao i internim pravilima i procedurama sistema menadžmenta ATCG. Edukaciju naročito realizovati kod novoangažovanog osoblja ATCG. Dosljedna primjena opštih i inernih akata i dokumenata sistema menadžmenta od strane organa ATCG i stalno zaposlog osoblja Redovno organizovati sastanke Savjeta za akreditaciju (savjetodavnog tijela	direktor rukovodilac službe Predstavnik rukovodstva za kvalitet direktor eksterno angažovani članovi upravljačkih, savjetodavnih i stručnih tijela ATCG svi zaposleni upravni odbor direktor	kontinuirano, a najmanje jednom godišnje kontinuirano kontinuirano, a najmanje dva puta godišnje	↔	

						ATCG čiji su članovi predstavnici zainteresovanih strana)	predsjednik i članovi Savjeta za akreditaciju	kontinuirano, a najmanje dva puta godišnje				
1.4 Rukovođenje i upravljanje	direktor sekretar rukovodilac službe Predstavnik rukovodstva za kvalitet	Usklađenost i kontrola propisa i standarda	zakoni i podzakonska akta Interna akta institucije interna pravila i procedure međunarodna dokumenta i standardi	Neusklađenost internih akata, pravila i procedura sa važećim zakonskim aktima, drugim normativnim dokumentima i standardima	3	9	27	Kada god je primjenjivo, u skladu sa procedurom PR.02-1 - Upravljanje dokumentima i zapisima, ažurirati interna akta, pravila i procedure ATCG kako bi se obezbijedila njihova usaglašenost sa izmijenjenim normativnim dokumentima i standardima Nakon izmjene u opštim i internim aktima ATCG, a koje su nastale kao posledica izmjena u normativnim dokumentima i standardima koji tangiraju rad ATCG, realizovati adekvatnu obuku osoblja (stalno zaposlenih, eksterno angažovanih članova upravljačkih, savjetodavnih i stručnih tilela ATCG i ocjenjivača) u cilju njihovog upoznavanja sa novonastalim promjenama. Kada je primjenjivo, sa promjenama takođe upoznati i druge zainteresovane strane.	direktor sekretar rukovodilac službe Predstavnik rukovodstva za kvalitet direktor sekretar rukovodilac službe Predstavnik rukovodstva za kvalitet	kontinuirano, nakon svake izmjene u mandatornim dokumentima kontinuirano, nakon svake izmjene u dokumentima	↔	
1.5 Rukovođenje i upravljanje	upravni odbor direktor	Donošenje nezakonitih odluka	zakoni i podzakonska akta interna akta institucije interna pravila i procedure	Donošenje odluka pod eksternim uticajem. Zloupotreba diskrecionih ovlašćenja.	2	9	18	Prilikom donošenja odluka dosljedno primjenivati Politiku nepristrasnosti i osigurati punu transparentnost u procedurama odlučivanja	upravni odbor direktor	kontinuirano	↔	

			Podnošenje izvještaja Vladi Crne Gore				Primjeniti pogodne mehanizame za ograničavanje diskrecionog odlučivanja (npr. formiranje komisija za donošenje odluka i sl.)	upravni odbor direktor	kontinuirano			
1.6 Rukovođenje i upravljanje	nadzorni odbor upravni odbor direktor rukovodilac službe rukovodilac odjeljenja Predstavnik rukovodstva za kvalitet	Nedovoljna kontrola rada	zakoni i podzakonska akta Interna pravila i procedure Interna kontrola Izveštaj o radu Podnošenje izvještaja Vladi Crne Gore	Neblagovremena realizacija uspostavljenih mjera za kontrolu rada. Neadekvatan nadzor nad radom zaposlenih.	2	9	18	Poštovati propisanu dinamiku za realizaciju internih provjera sistema menadžmenta, preispitivanja od strane rukovodstva, sačinjavanja godišnjih izvještaja o radu. Po prijemu prigovora i žalbi na rad ATCG u propisanom roku primijeniti postupak za njihovo rješavanje i po potrebi preduzimanje adekvatnih mjera. Vršiti nadzor na radom zaposlenih tokom obavljanja redovnih poslovnih zadataka	nadzorni odbor upravni odbor direktor rukovodilac službe Predstavnik rukovodstva za kvalitet direktor rukovodilac službe rukovodilac odjeljenja	kontinuirano kontinuirano	↔	
1.7 Rukovođenje i upravljanje	direktor rukovodilac službe Predstavnik rukovodstva za kvalitet	Narušavanje principa transparentnosti	zakoni i podzakonska akta interna akta institucije interna pravila i procedure Javno dostupne informacije	Neredovno ažuriranje web portala ATCG relevantnim informacijama koje su od značaja za zainteresovane strane. Nedovoljna informisanost javnosti o ulozi i značaju akreditacije, kao i djelatnosti i radu ATCG.	3	7	21	Na web poratu ATCG objavivati i ažurirati sve informacije od značaja za zainteresovane strane, a koje nemaju status povjerljive dokumentacije (npr. osnivačka akta, godišnji programi rada i izvještaji o radu, katalog usluga akreditacije koje pruža ATCG, cjenovnik usluga akreditacije, kriterijumi akreditacije, pravila akreditacije, regstar	direktor Predstavnik rukovodstva za kvalitet	kontinuirano	↔	

						akreditovanih organizacija sa dodijeljenim obimima akreditacije, postupak za podnošenje i rješavanje prigovora i žalbi, plan integriteta, vodič za pristup povjerljivim informacijama koje su u vlasništvu ATCG, druge informacije u vezi sa akreditacijom i radom ATCG)		kontinuirano		
						Organizovati okrugle stolove/promotivne skupove za zainteresovane strane na temu organizacije i rada ATCG, kao i sprovođenja postupka akreditacije tijela za ocjenjivanje usaglašenosti	direktor rukovodilac službe	kontinuirano, a najmanje dva puta godišnje		
2.1 Kadrovska politika, etično i profesionalno ponašanje zaposlenih	direktor rukovodilac službe rukovodilac odjeljenja	Neefikasna i neracionalna kadrovska politika	zakoni i podzakonska akta interna akta institucije interna pravila i procedure Ugovori o radu Ugovori o djelu Etički kodeks Godišnji plan obuke	Nedovoljan broj stalno zaposlenog osoblja. Neracionalno raspoređivanje poslova (preopterećenost osoblja).	3 8 24	Redovno vršiti analizu postojećih kadrovskih kapaciteta, kao i potreba i mogućnosti za angažovanjem novozaposlenih (npr. prilikom sastanaka kolegijuma, sastanaka posvećenih preispitivanju od strane rukovodstva, prilikom planiranja budžeta za narednu poslovnu godinu, prilikom izrade Programa rada za narednu poslovnu godinu i sl.) Dodjeljivati odgovornosti i zadatke zaposlenima shodno opisu poslova navedenim u Pravilniku o unutrašnjoj organizaciji i sistematizaciji radnih	direktor rukovodilac službe rukovodilac odjeljenja direktor rukovodilac službe rukovodilac odjeljenja	najmanje dva puta godišnje kontinuirano	↔	

						mjesta, kao i drugim internim pravilima i procedurama. Pri dodatnim angažmanima zaposlenih voditi računa o ravnomjernoj raspodjeli poslova i radnih zadataka na zaposlene.		kontinuirano		
2.2 Kadrovska politika, etično i profesionalno ponašanje zaposlenih	direktor rukovodilac službe poslovni sekretar	Nezakonit proces planiranja i sprovođenja procedure zapošljavanja	zakoni i podzakonska akta interna akta institucije	Nedostatak finansijskih resursa kao preduslova za pokretanje postupka zapošljavanja. Neadekvatno sprovođenje procedure zapošljavanja. Netransparentnost donošenja odluke o prijemu novozaposlenog.	3 9 27	Blagovremeno predvidjeti sredstva za angažovanje novozaposlenih shodno analizi kadrovskih kapaciteta i realno utvrđenim potrebama za popunjavanje upražnjenih radnih mjesta Pokretanje postupka zapošljavanja inicirati isključivo nakon obezbjeđivanja finansijskih sredstava za angažovanje novozaposlenih Proceduru zapošljavanja sprovoditi nepristrasno, objektivno i transparentno, u skladu sa odredbama Zakona o radu (npr. u skladu sa Pravilnikom o sistematizaciji utvrditi opis radnog mjesta i zahtijevane kriterijume, u postupku objavljivanja javnog poziva uključiti Zavod za zapošljavanje Crne Gore, formirati Komisiju za pregled i vrednovanje pristiglih prijavi i sprovođenje intervjua sa kandidatima, donijeti odluku izboru najboljeg	direktor rukovodilac službe direktor direktor poslovni sekretar	kontinuirano, prilikom izrade predlog budžeta za narednu poslovnu god. kontinuirano kontinuirano, prilikom svakog pokretanja procedure zapošljavanja	↔	

						<p>kandidata u skladu sa predlogom Komisije)</p> <p>Obavijestiti sve učesnike na javnom konkursu o konačnoj odluci u vezi sa izborom kandidata i o zakonskoj mogućnosti i roku za podnošenja žalbe na tu odluku.</p> <p>Sa novozaposlenim zaključiti Ugovor o radu u pisanoj formi</p>	<p>direktor poslovni sekretar</p> <p>direktor</p>	<p>kontinuirano, prilikom svakog pokretanja procedure zapošljavanja</p> <p>kontinuirano, nakon svakog sprovedenog postupka izbora kandidata</p> <p>kontinuirano, prije stupanja u radni odnos</p>		
2.3 Kadrovska politika, etično i profesionalno ponašanje zaposlenih	<p>direktor svi zaposleni eksterno angažovani članovi upravljačkih, savjetodavnih i stručnih tijela ATCG</p> <p>eksterno angažovani ocjenjivači/tehnički i eksperti</p>	Nestručan i neprofesionalan rad	<p>interna akta institucije</p> <p>Interna pravila i procedure</p>	<p>Nedostatak finansijskih sredstava za obučavanjem i profesionalnim usavršavanjem. Nedovoljna kompetentnost stalno zaposlenog osoblja i eksterno angažovanih saradnika (članovi upravljačkih, savjetodavnih i stručnih tijela ATCG i ocjenjivači/tehnički eksperti).</p>	<p>3 9 27</p>	<p>Blagovremeno obezbijediti sredstva za obuku stalno zaposlenog osoblja i eksterno angažovanih saradnika.</p> <p>Imajući u vidu sredstva opredijeljena budžetom i eventualne projekte tehničke pomoći, blagovremeno utvrditi Plan obuke za tekuću godinu, a zatim shodno Planu sprovođiti obuke stalno zaposlenog osoblja i eksterno angažovanih saradnika. Posebnu pažnju obratiti na obuku novozaposlenih i novoangažovanih eksternih saradnika (uključujući ocjenjivače).</p>	<p>direktor rukovodilac službe</p> <p>direktor rukovodilac službe Predstavnik rukovodstva za kvalitet</p>	<p>kontinuirano, prilikom izrade predloga budžeta za narednu poslovnu god</p> <p>kontinuirano, shodno Planu obuke</p>	↔	

						U zvanje ocjenjivača i tehničkih eksperata imenovati samo one kandidate koji su prošli proceduru izbora i imenovanja od strane ATCG shodno proceduri PR.10-1 - Procedura za izbor, praćenje performansi i održavanje kompetentnosti ocjenjivača i tehničkih eksperata. Nakon izbora u zvanje, potrebno je u kontinuitetu pratiti njihovu kompetentnost na način kako je to opisano predmetnom procedurom.	Komisija za izbor i praćenje ocjenjivača	kontinuirano		
						U cilju dobijanja dodatnih informacija o kompetentnosti, redovno prikupljati i analizirati povratne informacije od korisnika usluga (ankete, prigovori, žalbe i sl.) i generisane izvještaje o praćenju performansi ocjenjivača i tehničkih eksperata angažovanih u ocjenjivačkim timovima ATCG	direktor rukovodilac službe rukovodilac odjeljenja Komisija za izbor i praćenje ocjenjivača Predstavnik rukovodstva za kvalitet	kontinuirano		
						Voditi i redovno ažurirati personalne kartone zaposlenih i eksterno angažovanih saradnika (članova upravljačkih, savjetodavnih i stručnih tijela ATCG i ocjenjivača/tehničkih eksperata) sa dokumentovanim dokazima o njihovoj kopetentnosti	Predstavnik rukovodstva za kvalitet rukovodilac službe rukovodilac odjeljenja Komisija za izbor i praćenje ocjenjivača	kontinuirano		

2.4 Kadrovska politika, etično i profesionalno ponašanje zaposlenih	<p>direktor svi zaposleni eksterno angažovani članovi upravljačkih, savjetodavnih i stručnih tijela ATCG</p> <p>eksterno angažovani ocjenjivači/tehničari i eksperti</p>	Neetično i neprofesionalno ponašanje zaposlenih i eksterno angažovanih saradnika	zakoni i podzakonska akta Interna akta institucije Etički kodeks	Nepoznavanje i neadekvatna primjena odredaba Zakona o radu, Zakona o zabrani diskriminacije i Zakona o zabrani zlostavljanja na radu. Nepoštovanje Etičkog kodeksa.	<table border="1"> <tr> <td style="background-color: #90EE90;">2</td> <td style="background-color: #FF0000;">8</td> <td style="background-color: #FFA500;">16</td> </tr> </table>	2	8	16	<p>Planirati i realizovati obuke za stalno zaposleno osoblje u vezi sa Politikom kvaliteta, Etičkim kodeksom ponašanja i zakonskim aktima koji obavezuju na etično i profesionalno ponašanje zaposlenih i zabranu diskriminacije i zlostavljanja na radu</p> <p>Blagovremeno obezbjeđivati da su svi stalno zaposleni, eksterno angažovani članovi upravljačkih, savjetodavnih i stručnih tijela potpisali Izjavu o poštovanju Etičkog kodeksa (posebno obratiti pažnju na novozaposlene i novoangažovane eksterne saradnike).</p>	<p>direktor menadžer integriteta Predstavnik rukovodstva za kvalitet poslovni sekretar</p> <p>direktor Predstavnik rukovodstva za kvalitet</p>	kontinuirano, a najmanje jednom godišnje	↔	
2	8	16											
3.1 Planiranje i upravljanje finansijama	<p>direktor rukovodilac službe rukovodilac odjeljenja Predstavnik rukovodstva za kvalitet upravni odbor</p>	Neadekvatni finansijski resursi	zakoni i podzakonska akta interna akta institucije	Neblagovremeno i neadekvatno planiranje budžeta	<table border="1"> <tr> <td style="background-color: #90EE90;">3</td> <td style="background-color: #FF0000;">9</td> <td style="background-color: #FFA500;">27</td> </tr> </table>	3	9	27	<p>U proces planiranja godišnjih budžeta uključiti rukovodioce službi i odjeljenja</p> <p>Prilikom planiranja budžeta uzeti u obzir trenutno stanje, kao i aktivnosti koje je potrebno realizovati u narednoj poslovnoj godini</p>	<p>direktor</p> <p>direktor rukovodilac službe rukovodilac odjeljenja Predstavnik rukovodstva za kvalitet poslovni sekretar</p>	kontinuirano, prilikom pripreme budžeta za narednu godinu	↔	
3	9	27											

3.2 Planiranje i upravljanje finansijama	direktor službenik za javne nabavke upravni odbor	Neadekvatno sprovođenje postupaka javnih nabavki	zakoni i podzakonska akta interna akta institucije	Nepoštovanje pravila i postupaka utvrđenih Zakonom o javnim nabavkama	3 9 27	Sagledati mogućnosti sistematizovanja radnog mjesta i prijema u radni odnos stalno zaposlenog lica koje bi obavljalo računovodstvene i knjigovodstvene poslove i poslove službenika za javne nabavke Prilikom planiranja, sprovođenja i izvještavanja o sprovedenim postupcima javnih nabavki dosljedno se pridržavati odredaba Zakona o javnim nabavkama	direktor upravni odbor direktor službenik za javne nabavke	do kraja 2026. godine kontinuirano	↔	
3.3 Planiranje i upravljanje finansijama	direktor upravni odbor nadzorni odbor Predstavnik rukovodstva za kvalitet	Neadekvatna revizija i izvještavanje	zakoni i podzakonska akta interna akta institucije interna pravila i procedure	Neadekvatno sprovođenje upravljanja i unutrašnjih kontrola. Neblagovremeno i netransparentno izvještavanje o izvršavanju budžeta.	3 9 27	U skladu sa procedurom PR.07.-1 Upravljanje rizicima, voditi i redovno ažurirati Registar rizika (obrazac ZPR.07.01-1) uključujući i rizike koji se odnose na finansijsku stabilnost Osim upravljanja rizicima, primjenjivati i druge pogodne mehanizme interne kontrole (npr. interna provjera, preispitivanje od strane rukovodstva i sl.) U skladu sa osnivačkim aktima, blagovremeno pripremati, usvajati i dostavljati na saglasnost Vladi Crne	direktor Predstavnik rukovodstva za kvalitet direktor Predstavnik rukovodstva za kvalitet upravni odbor direktor Eksterno angažovano lice za finansijsko-	kontinuirano kontinuirano, a najmanje jednom godišnje zaključno sa 31.03. tekuće godine	↔	

						<p>Gore godišnje izvještaje o radu ATCG(sa finansijskim iskazima). Javno objavljivati godišnje izvještaje o radu na web portalu ATCG (finansijski iskazi se objavljuju na web portalu Uprave prihoda i carina Crne Gore)</p> <p>U skladu sa osnivačkim aktima, blagovremeno pripremati, usvajati i dostavljati Vladi Crne Gore godišnje izvještaje Nadzornog odbora ATCG o zakonitosti rada organa ATCG i pregledu izvještaja o poslovanju i finansijskih izvještaja ATCG, sa predlogom mjera</p> <p>u skladu sa čl.18 Zakona o upravljanju i unutrašnjim kontrolama u javnom sektoru podnositi nadležnom ministarstvu godišnje izvještaje o aktivnostima na sprovođenju i unapređenju upravljanja i kontrola za predhodnu godinu</p>	<p>računovodstvene poslove</p> <p>nadzorni odbor direktor</p> <p>direktor</p>	<p>zaključno sa 31.03. tekuće godine</p> <p>kontinuirano, a najmanje jednom godišnje</p> <p>do 15. februara tekuće godine</p>		
4.1 Čuvanje i bezbjednost podataka i dokumenata	direktor svi zaposleni	Neadekvatni mehanizmi formalne i faktičke zaštite podataka	Interna pravila i procedure	Gubitak informacija i podataka. Nedovoljna obučenost zaposlenih za čuvanje i elektronsku obradu podataka.	3 8 24	U saradnji sa eksterno angažovanim pružaocem IT usluga, u kontinuitetu raditi na jačanju sistema bezbjednosti i čuvanja elektronskih podataka. Redovno vršiti rezervno zapisivanje (beck up) podataka.	direktor svi zaposleni	kontinuirano	↔	

						Realizovati obuke zaposlenih za rukovanje podacima u elektronskoj formi i njihovoj zaštiti	direktor poslovni sekretar	kontinuirano		
4.2 Čuvanje i bezbjednost podataka i dokumenata	Predstavnik rukovodstva za kvalitet arhivar svi zaposleni	Nesavjesno postupanje sa dokumentacijom	interna pravila i procedure	Upotreba neodobrenih ili nevažećih izdanja dokumenata. Neadekvatno čuvanje i/ili gubitak dokumenata i zapisa.	2 10 20	Nastaviti sa dosljednom primjenom procedure PR.02-1 Upravljanje dokumentima i zapisima, koja propisuje postupak izrade i donošenja novih dokumenata, postupak izmjene postojećih dokumenata, povlačenje i arhiviranje nevažećih izdanja dokumenata, vođenje registra interne i eksterne dokumentacije, označavanje dokumenata, način i vrijeme čuvanja zapisa i sl. Realizovati aktivnosti na obezbjeđivanju sredstava, planiranju, modeliranju, izradi i implementaciji softverskog rješenja za elektronsko upravljanje dokumentima i zapisima	Predstavnik rukovodstva za kvalitet svi zaposleni direktor rukovodilac službe Predstavnik rukovodstva za kvalitet svi zaposleni	kontinuirano do kraja 2026. godine	↔	
4.3 Čuvanje i bezbjednost podataka i dokumenata	direktor eksterno angažovani članovi upravljačkih, savjetodavnih i stručnih tijela ATCG eksterno angažovani ocjenjivači/tehničari i eksperti	Zloupotreba povjerljivih službenih podataka i informacija o korisnicima usluga / strankama	Zakoni i podzakonska akta interna akta institucije interna pravila i procedure	Prenošenje povjerljivih podataka i informacija (uključujući podatke i informacije dobijene od korisnika usluga akreditacije) trećim licima, bez predhodnog formalnog odobrenja. Procesuiranje ličnih podataka suprotno zakonu	3 9 27	U svakom Ugovoru o akreditaciji (koji ATCG zaključuje sa klijentom) uključiti klauzule koje pravno obavezuju ATCG da čuva podatke i informacije do kojih dođe tokom sprovođenja postupka akreditacije	direktor	kontinuirano, prilikom zaključivanja svakog Ugovora o akreditaciji	↔	

	svi zaposleni					<p>Obezbijediti da svi novozaposleni, novoangažovani ekstrni članovi upravljačkih, savjetodavnih i stručnih tijela ATCG blagovremeno potpišu Izjavu o čuvanju tajnosti podataka i informacija (obrazac ZPQ.00.03). U okviru Ugovora o angažovanju sa eksternim pružiocima usluga uključiti klauzulu o njihovoj obavezi čuvanja povjerljivih podataka i informacija do kojih dođu tokom saradnje sa ATCG. U okviru Ugovora o angažovanju ocjenjivača i eksperata na poslovima ocjenjivanja uključiti klauzulu o njihovoj obavezi čuvanja povjerljivih podataka i informacija do kojih dođu tokom postupka akreditacije tijela za ocjenjivanje usaglašenosti.</p>	<p>direktor poslovni sekretar Predstavnik rukovodstva za kvalitet</p>	kontinuirano		
					<p>Na sastancima kolegijuma , kao i na drugim sastancima upravljačkih, savjetodavnih i stručnih tijela ATCG podsjećati na obavezu čuvanja tajnosti informacija i podataka. Prilikom ocjenjivanja tijela za ocjenu usaglašenosti od strane ocjenjivačkog tima ATCG, na uvodnom sastanku istaći obavezu ATCG i ocjenjivača/tehničkih eksperata u vezi sa čuvanjem tajnosti i podataka do kojih dođu tokom sprovođenja postupka ocjenjivanja.</p>	<p>direktor svi zaposleni vodja tima ocjenjivača</p>	kontinuirano			

						Sa ličnim podacima postupati isključivo u skladu sa Zakonom	direktor svi zaposleni	kontinuirano		
4.4 Cuvanje i bezbjednost podataka i dokumenata	direktor odgovorno lice za postupanje po zahtjevu za slobodan pristup informacijama	Neblagovremeno postupanje po zahtjevima za slobodan pristup informacijama	zakoni i podzakonska akta interna akta institucije interna pravila i procedure Vodič za slobodan pristup informacijama	Nepoštovanje postupka i rokova za reagovanje po podnijetim zahtjevima za slobodan pristup informacijama	2 8 16	Redovno vršiti preispitivanje i po potrebi ažuriranje Vodiča za slobodan pristup informacijama U slučaju dobijanja zahtjeva za slobodan pristup informacijama postupiti po istom u zakonski propisanom roku	direktor službenik za slobodan pristup informacijama direktor službenik za slobodan pristup informacijama	kontinuirano, a najmanje jednom godišnje kontinuirano, po prijemu zahtjeva za pristup informacijama	↔	
5.1 Nepriistrasnost	direktor eksterno angažovani članovi upravljačkih, savjetodavnih i stručnih tijela ATCG eksterno angažovani ocjenjivači/tehničari i eksperti svi zaposleni	Priistrasno ponašanje i sukob interesa	zakoni i podzakonska akta interna akta institucije interna pravila i procedure	Nepoštovanje uspostavljenih mehanizama za obezbjeđenje nepristrasnosti i izbjegavanje sukoba interesa Neadekvatno upravljanje rizicima po nepristrasnost	3 10 30	Obezbijediti da svi novozaposleni i novoangažovani ekstrni članovi upravljačkih, savjetodavnih i stručnih tijela ATCG budu blagovremeno upoznati i potpišu Pojedinačnu izjavu o nepristrasnosti (obrazac ZPQ.00.05). U okviru pojedinačnih Ugovore o angažovanju sa ocjenjivačima/tehničkim ekspertima na poslovima ocjenjivanja uključiti klauzule o njihovoj nepristrasnosti i objektivnosti. Redovno podsjećati stalno zaposleno osoblje i eksterno angažovane saradnike (članove upravljačkih, savjetodavnih i stručnih tijela ATCG i ocjenjivače/tehničkiek	direktor poslovni sekretar Predstavnik rukovodstva za kvalitet direktor rukovodilac službe Predstavnik rukovodstva za kvalitet	kontinuirano kontinuirano	↔	

					<p>sperate) o obavezi izbjegavanja sukoba interesa i očuvanja nepristrasnosti</p>	<p>poslovni sekretar</p>	<p>kontinuirano</p>
					<p>U cilju izbjegavanja sukoba interesa i obezbjeđenja nepristrasnosti, redovno vršiti analizu odnosa ATCG sa povezanim tijelima. U kontinuitetu, a u skladu sa procedurom PR.07-1 Upravljanje rizicima, vršiti identifikaciju, analizu i upravljanje rizicima po nepristrasnost rada ATCG i sprovođenja postupka akreditacije</p>	<p>direktor Predstavnik rukovodstva za kvalitet rukovodilac službe</p>	<p>kontinuirano, a najmanje dva puta godišnje</p>
					<p>Po prijemu prigovora na rad ATCG ili žalbe na odluke u vezi sa statusom akreditacije, a koji se takođe mogu odnositi na narušavanje nezavisnosti, nepristrasnosti i objektivnosti od strane ATCG, blagovremeno pokrenuti postupak propisan procedurom PR.08 - Procedura za rješavanje prigovora i žalbi</p>	<p>upravni odbor direktor Predstavnik rukovodstva za kvalitet</p>	<p>kontinuirano, po prijemu prigovora ili žalbe</p>
					<p>Obezbijediti da sva pitanja u vezi sa potencijalnim sukobom interesa, nezavisnošću i nepristrasnošću rada ATCG (uključujući i nepristrasnost sprovođenja postupka akreditacije) budu predmet razmatranja od strane Savjeta za akreditaciju, čiji su članovi predstavnici zainteresovanih strana</p>	<p>direktor Predstavnik rukovodstva za kvalitet Savjet za akreditaciju</p>	<p>kontinuirano</p>

6.1 Antikorupcija	direktor odgovorno lice za prijem i postupanje po prijavi zviždača svi zaposleni	Neprijavlivanje korupcije i drugih nezakonitih radnji	zakoni i podzakonska akta interna akta institucije	Neprijavlivanje ili neadekvatno postupanje sa prijavama korupcije	3 9 27	Obezbijediti da prevencija korupcije bude tema kolegijuma i drugih sastanaka organa i tijela ATCG. Po prijavi zviždača, postupiti u skladu sa Pravilnikom o bližem načinu postupanja po prijavi zviždača o ugrožavanju javnog interesa koje upućuje na postojanje korupcije.	direktor odgovorno lice za prijem i postupanje po prijavi zviždača	kontinuirano	↔	
6.2 Antikorupcija	direktor upravni odbor nadzorni odbor	Nepodnošenje izvještaja o prihodima i imovini javnih funkcionera	Zakoni i podzakonska akta	Neblagovremeno i nepotpuno dostavljanje izvještaja o imovini i prihodima javnih funkcionera	2 9 18	Redovno dostavljati izvještaje o imovini i prihodima javnih funkcionera	direktor upravni odbor nadzorni odbor	kontinuirano, u skladu sa rokovima definisanim zakonom	↔	
6.3 Antikorupcija	direktor poslovni sekretar	Neprijavlivanje poklona i odsustvo evidencije poklona	Zakoni i podzakonska akta	Primanje poklona suprotno odredbama Zakona o sprječavanju korupcije	2 8 16	Redovno evidentiranje primljenih poklona i dostavljanje ASK izvoda iz evidencije poklona na propisanom obrascu	direktor poslovni sekretar	kontinuirano, u skladu sa rokovima propisanim zakonom	↔	
6.4 Antikorupcija	direktor	Neprijavlivanje podataka o sponzorstvima i donacijama	zakoni i podzakonska akta	Nedostavljanje ASK informacija o upotrebi javnih resursa u toku izborne kampanje	3 8 24	Kada je primjenjivo, javno objavljivati i dostavljati ASK relevantne informacije u cilju obezbjeđenja transparentnosti upotrebe javnih resursa u toku izborne kampanje	direktor	kontinuirano, u toku trajanja izborne kampanje	↔	