

Crna Gora

Lokalni javni emiter „Radio Kotor” DOO

IZVJEŠTAJ O SPROVOĐENJU

PLANA INTEGRITETA

Izvještajni period

(januar-decembar 2022. godine)

UVOD

Plan integriteta **Lokalnog javnog emitera Radio Kotor DOO** (u daljem tekstu **Radio Kotor DOO**) usvojen je **27.09. 2022. godine**, a zasniva se na identifikaciji mogućih rizičnih oblasti i rizičnih radnih mjesta kao i utvrđivanju vrste rizika koji mogu narušti integritet **Radio Kotor DOO** kako bi se pregledom i analizom mjera koje već postoje kao i predlaganjem novih mjera koje bi te rizike trebalo da umanje ili otklone, stvorili uslovi da se rizici na vrijeme prepoznaju i eliminišu adekvatnim aktivnostima, odnosno da se njihov efekat, ukoliko se ipak pojave, otkloni na način da ne proizvode štetu po ugled i poslovanje same institucije.

Plan integriteta  **Radio Kotor DOO** se sastoji od **šest oblasti**, odnosno od mjera koje se odnose na  **Radio Kotor DOO**. Struktura plana sastoji se od sljedećeg: Oblasti rada koje su prepoznate kao podložne riziku; prepoznavanja radnih mjesta koja mogu biti podložna riziku u okviru pomenutih rizičnih oblasti; definisanja vrste rizika u odnosu na određenu oblast i radna mjesta; postojećih mjera kontrole; konkretizovanje preostalog rizika (rezidualnog) ili opis rizika koji nije pokriven postojećim mjerama kontrole, ocjene intenziteta rezidualnog rizika, predloženih ili preduzetih mjera za smanjenje ili eliminisanje rizika; određenja odgovorne osobe za praćenje sprovođenja predloženih mjera, kao i utvrđivanja napretka u odnosu na primjenu predloženih mjera i status rizika.

Prvi izvještaj o ostvarivanju plana integriteta  **Radio Kotor DOO** odnosi se na period januar-decembar 2022. godine. U skladu sa rješenjem o određivanju službenika koji je odgovoran za pripremu i sprovođenje plana intgriteta (menadžerka integriteta-Irena Stanovčić) **br. 33 od 04. 02. 2020. godine** te Odlukom o stupanju na snagu Plana integriteta, **br. 01-297/22 od 27. 09. 2022. godine**, praćenje sprovođenja predloženih mjera i njihovog učinka vrši odgovorna osoba, menadžer integriteta, putem podnošenja izvještaja o ostvarivanju plana integriteta starješini organa vlasti.

Menadžer integriteta je odgovoran starješini, odnosno odgovornom licu u organu vlasti, za stalno praćenje i periodične kontrole rizika i ažuriranje mjera plana integriteta, aktivnosti koje se odnose na sprovođenje pravila etičkih kodeksa, podsticanje integriteta i sprječavanja korupcije, sukoba interesa i drugih oblika pristrasnog postupanja zaposlenih na određenim poslovima. Svi zaposleni su dužni obavijestiti menadžera integriteta o situaciji, pojavi ili radnji za koju su na osnovu razumnog uvjerenja procijenili da predstavlja mogućnost za nastanak ili razvoj korupcije, sukoba interesa, drugih oblika nezakonitog ili neetičnog postupanja. Menadžer integriteta je dužan da razmotri obavještenja o kojima je obaviješten i da postupi u skladu sa njegovim dužnostima kod sprovođenja plana integriteta.

Zaposleni u organu vlasti dužni su da menadžeru integriteta, na njegov zahtjev, dostave sve potrebne podatke i informacije od značaja za sprovođenje plana integriteta.

Izvještavanje o sprovođenju predloženih mjera vrši se najmanje jednom godišnje, a po potrebi se može podnositi i u kraćim vremenskim intervalima.

U tom smislu primjena principa integriteta treba da doprinese daljem razvoju profesionalnosti i nepristrasnosti u organu vlasti kao i povećanju transparentnosti rada  **Radio Kotor DOO** kao i odgovornosti svakog zaposlenog.

Plan integriteta obuhvata monitoring rizičnih grupa poslovnih procesa unutar **Radio Kotor DOO** kao i sprovođenje konkretnih mjera karakterističnih za svaku oblast rizika.

Oblasti rizika: **Radio Kotor DOO**

1. Opšte oblasti
2. **Rukovođenje i upravljanje;**
3. **Kadrovska politika, etično i profesinalno ponašanje zaposlenih;**
4. **Planiranje i upravljanje finansijama;**
5. **Čuvanje i bezbjednost podataka i dokumenata.**
6. Posebne oblasti
7. **Slobodan pristup informacijama**
8. **Odnosi sa javnošću**

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**TABELARNI I STATISTIČKI PRIKAZ STEPENA REALIZACIJE MJERA U PLANU INTEGRITETA I STATUSA RIZIKA**

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| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **NAZIV ORGANA VLASTI: „Radio Kotor“ DOO** | | | | | | | | |
| **Broj i naziv oblasti rizika** | **Broj rezidualnih rizika** | **Broj mjera za smanjenje rizika** | **Broj i Stepen realizacije mjera** | | | **Broj i status rezidualnih rizika o čijim izmjenama je izvještavano** | | |
| **↑**  **povećan rizik** | **=**  **nepromijenjen**  **rizik** | ↓  **smanjen rizik** |
| **R** | **DR** | **NR** |
| **1. Rukovođenje i upravljanje** | 5 | 11 | 6 | 1 | 4 |  | 2 | 3 |
| **2. Kadrovska politika** | 11 | 13 | 11 | 1 | 1 |  | 2 | 9 |
| **3. Planiranje i upravljanje finansijama** | 4 | 7 | 5 |  | 2 |  | 2 | 2 |
| **4. Čuvanje i bezbjednost podataka i dokumenata** | 4 | 5 | 5 |  |  |  |  | 4 |
| **5. Slobodan pristup informacijama** | 2 | 3 | 2 |  | 1 |  | 1 | 1 |
| **6. Odnosi sa javnošću** | 2 | 3 | 3 |  |  |  |  | 1 |
|  |  |  |  |  |  |  |  |  |
| **Ukupno:** | 30 | 42 | 32 | 2 | 8 |  | 7 | 20 |

PRINCIP INTEGRITETA

Princip integriteta, konkretizovan kroz plan, za cilj ima dalji razvoj profesionalne, nepristrasne i etične javne uprave. Njegovo sprovođenje za rezultat ima ponašanje institucija i službenika koji obavljaju povjerene im poslove pošteno, nezavisno, nepristrasno, transparentno, i u skladu sa propisima i moralnim vrijednostima. Identifikacijom rizičnih oblasti odnosno rizičnih procesa i radnih mjesta, pregledom mjera koje već postoje kao i predlaganjem mjera koje te rizike treba da umanje ili otklone, stvaraju se uslovi da se rizici na vrijeme prepoznaju i otklone. Plan integriteta temelji se na identifikaciji mogućih rizičnih oblasti, radnih mjesta i utvrđivanju preostalih rizika koji nijesu pokriveni postojećim mjerama kontrole, te predlogom mjera za njihovo eliminisanje.

TABELARNI PRIKAZ AKTIVNOSTI NA SPROVOĐENJU PLANA INTEGRITETA

REGISTAR RIZIKA

LEGENDA TERMINA I SIMBOLA

Ukupna procjena rizika

•/V Visok rizik – Rizik narušavanja integriteta je već prisutan u ovom procesu ili je vrlo vjerovatno da će se pojaviti

•/S Srednji rizik – Rizik narušavanja integriteta u ovom procesu je moguć, ali se mjerama kontrole upravlja tim rizikom

•/N Nizak rizik – Mala je vjerovatnoća da će se aktivirati rizik narušavanja integriteta u ovom procesu, zbog postojećih mjera kontrole

Ocjena rizika:

Ocjene su od 1 do 100, tako da ocjene od 1-15 predstavljaju „najmanju vjerovatnoću“ pojave narušavanja integriteta sa „veoma malim“ uticajem (rizik niskog intenziteta), ocjene od 16-48 predstavljaju „srednju vjerovatnoću“ pojave narušavanja integriteta sa „umjerenim“ uticajem (rizik srednjeg intenziteta) dok ocjene od 49-100 znači „skoro izvjesnu“ pojavu narušavanja integriteta sa „veoma velikim“ uticajem (rizik visokog intenziteta).

Napredak stanja od prethodne provjere ↔ Bez promjena; ↑ Povećan rizik; ↓ Smanjen rizik;

Datum provjere: 11.04.2023.

Provjeru izvršila:

Irena Stanovčić

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|  | Izvještaj o sprovođenju plana integriteta za 2022. godinu | | | | | | | | | | | | |  |
|  | Radio Kotor DOO | | | | | | | | | | | | |  |
|  | REGISTAR RIZIKA | | | PROCJENE I MJERENJE RIZIKA | | | | | REAGOVANJE NA RIZIK | | | PREGLED I IZVJEŠTAVANJE O RIZICIMA | |  |
|  | Oblasti rizika | Radna mjesta | Osnovni rizici | Postojeće mjere kontrole | Preostali rizici(rezidualni) | Vjer. | Posljedice | Procjena | Predložene mjere za smanjenje/otklanjanje rizika | Ogovorna osoba | Rok | St. | Kratak opis i ocjena realizacije mjere |  |
|  | |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | | |  |  | | --- | --- | | 1.1 | Rukovođenje i upravljanje | | |  | | --- | | direktor | | |  | | --- | | Bezbjednost zaposlenih | | Diskriminacija, ograničenje i uskraćivanje prava zaposlenog kod otkrivanja i prijavljivanja sumnje na korupciju i druge povrede integriteta | | Donošenje nezakonitih odluka | | |  | | --- | | Edukacija | | Eksterna revizija | | Etički kodeks | | Godišnji plan rada | | Inspekcijska kontrola | | Interna akta institucije | | Evidentiranje primljenih poklona | | |  | | --- | | Rizici na nivou visokog, srednjeg i nižeg menadzmenta u procesu primjene i sprovođenja procedura odlučivanja, delegiranja ovlašćenja, korišćenje diskrecionih ovlašćenja, Primanje poklona (javnih funkcionera) suprotno odredbama Zakona o sprječavanju korupcije, nepoštovanje zakonske obaveze evidentiranja primljenih poklona i njihove vrijednosti i nedostavljanje Agenciji za sprječavanje korupcije izvoda iz evidencije poklona. | | |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | |  | | --- | | 3 | | |  | | --- | | 4 | | |  | | --- | | 12 | | | | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Sprovođenje procedura odlučivanja, donošenja opštih i pojedinačnih akata Sprovođenje nadzornih i kontrolnih mehanizama. | direktor | kontinuirano | |  | | --- | | ↓ | | Realizovano  Redovno je u toku godine izvještavano o sprovođenju strateških dokumenata , planova i programa. | |  | |  |  | |  |  |  | |  |  |  |  | |  |  |  |  | |  |  |  |  | | Puna transparentnost u procedurama odlučivanja u oblastima iz nadležnosti institucije. | direktor | kontinuirano | Realizovano  Obezbijeđena je transparentnost u oblasti odlučivanja na način što je na sjednicama Savjeta u zakonskim rokovima usvajana propisana dokumentacija koja je blagovremeno objavljivana u biltenu na sajtu Radio Kotora. | |  | |  |  | |  |  |  | |  |  |  |  | |  |  |  |  | |  |  |  |  | | | | | | | | | | | | | | |  |
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|  | |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | | |  |  | | --- | --- | | 3.1 | Planiranje i upravljanje finansijama | | |  | | --- | | direktor | | rukovodilac službe ekonomsko finansijskih poslova | | |  | | --- | | Neadekvatno planiranje i izvršavanje budžeta | | |  | | --- | | Edukacija | | |  | | --- | | Neadekvatno planiranje budžeta | | |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | |  | | --- | | 3 | | |  | | --- | | 4 | | |  | | --- | | 12 | | | | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Osigurati učešće svih relevantnih subjekata i jedinica prilikom planiranja budžeta | rukovodilac službe ekonomsko finansijskih poslova | kontinuirano | |  | | --- | | ↓ | | Realizovano  Na radnim sastancima rukovodilac institucije i rukovodilac finansijske službe planiraju budžet Radio Kotora, uključujući i službenika za javne nabavke. | |  | |  |  | |  |  |  | |  |  |  |  | |  |  |  |  | |  |  |  |  | | Pohađati relevantne obuke i seminare na temu planiranja budžeta | rukovodilac finansijsko računovodstvenih poslova | kontinuirano | Realizovano  Rukovodilac finansijske službe pohađao je obuke i seminare. | |  | |  |  | |  |  |  | |  |  |  |  | |  |  |  |  | |  |  |  |  | | | | | | | | | | | | | | |  |
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|  | **PODNOSILAC IZVJEŠTAJA** |  | **STARJEŠINA/ODGOVORNO LICE U ORGANU VLASTI** | |  |
|  | **Menadžer integriteta** |  |  |  |  |
|  | **\_\_Irena Stanovčić\_\_\_\_\_** |  |  | **\_\_\_\_Vjera Banićević\_\_\_\_\_\_\_\_\_\_** |  |

OBRAZLOŽENJE

Polazeći od osnovnih zadataka Radio Kotor DOO definisanih Zakonom o medijima, Zakonom o elektronskim medijima, Kodeksom novinara Crne Gore, Statutom Lokalnog javnog emitera Radio Kotor DOO, Etičkim kodeksom Lokalnog javnog emitera „Radio Kotor“DOO, koji je usaglašen sa Kodeksom novinara Crne Gore, i posebno uzimajući u obzir Pravilnik o unutrašnjoj organizaciji i sistematizaciji, definisani su osnovni poslovni rizici unutar Radio Kotor DOO, te izrađen detaljan Plan integriteta Radio Kotora, koji sadrži visoke standarde integriteta koji su izraženi kroz konkretne mjere za otklanjanje prepoznatih i mogućih rizika koji se mogu pojaviti tokom sprovođenja redovnih aktivnosti organa vlasti.

S tim u vezi, Radio Kotor DOO je sproveo neophodne aktivnosti od strane organizacionih jedinica u cilju konkretne implementacije mjera sadržanih u planu integriteta, čiji prvi izvještaj obuhvata izvještavanje o ključnim rizicima.

Na osnovu izloženog i pojedinačne procjene implementacije predloženih mjera za smanjenje rizika, predlažem direktorici Radio Kotora da prihvati i odobri navedeni izvještaj.

**PODNOSILAC IZVJEŠTAJA STARJEŠINA/ODGOVORNO LICE U ORGANU VLASTI**

**Menadžerka integriteta**

**Irena Stanovčić s.r. Vjera Banićević**

**Broj: 01-148/23**

**Kotor, 12.04. 2023. godine**