

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 |
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| **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 |  |
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| 1.1 | Rukovođenje i upravljanje |

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| Bezbjednost zaposlenih |
| Diskriminacija, ograničenje i uskraćivanje prava zaposlenog kod otkrivanja i prijavljivanja sumnje na korupciju i druge povrede integriteta |
| Donošenje nezakonitih odluka |

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| Edukacija |
| Eksterna revizija |
| Etički kodeks |
| Godišnji plan rada |
| Inspekcijska kontrola |
| Interna akta institucije |
| Evidentiranje primljenih poklona |

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| 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. |

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| Sprovođenje procedura odlučivanja, donošenja opštih i pojedinačnih akataSprovođenje nadzornih i kontrolnih mehanizama.  | direktor | kontinuirano |

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 | RealizovanoRedovno je u toku godine izvještavano o sprovođenju strateških dokumenata , planova i programa. |
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| Puna transparentnost u procedurama odlučivanja u oblastima iz nadležnosti institucije. | direktor | kontinuirano | RealizovanoObezbijeđena 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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| 1.2 | Rukovođenje i upravljanje |

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| Nepostojanje jasne strategije upravljanja, misije i vizije |

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| Plan unapređenja rada u odnosu na preporuke DRI |
| praćenje propisa; Donošenje opštih i pojedinačnih akata |

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| Neadekvatno kreiranje politike razvoja i upravljanja (utvrđivanje misije, vizije, strategija i planova) |

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| Osigurati učešće svih relevantnih subjekata i jedinica prilikom kreiranja politike razvoja i upravljanja. | direktor | kontinuirano |

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 | RealizovanoOsigurano je učešće svih relevantnih subjekata u kreiranju politike razvoja i upravljanja. |
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| Primjenjivati modele za procjenu učinkovitosti i uspješnosti organizacije | rukovodioci organizacionih jedinica | kontinuirano | Djelimično realizovanoUspješnost organizacije praćena je kroz kontrolu primjene zakonske regulative u svim segmentima. |
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| Redovno u toku godine izvještavati o sprovođenju strateških dokumenata, planova i programa | direktor | kontinuirano | RealizovanoProgramska dokumenta i akti: Godišnji izvještaji o realizaciji programskih sadržaja za 2022. godinu, Finansijski plan za 2023. godinu, Finansijski izvještaj za 2022. godinu, Program rada za 2023. godinu i programskre šeme. Navedena dokumenta, planovi i programi su objavljeni u biltenu na sajtu Radio Kotora. |
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| 1.2 | Rukovođenje i upravljanje |

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| Nepostojanje jasne strategije upravljanja, misije i vizije |

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| Plan unapređenja rada u odnosu na preporuke DRI |
| praćenje propisa; Donošenje opštih i pojedinačnih akata |

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| Neadekvatno kreiranje politike razvoja i upravljanja (utvrđivanje misije, vizije, strategija i planova) |

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| 1.3 | Rukovođenje i upravljanje |

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| neposredni rukovodioci |

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| Narušavanje integriteta institucije |
| Narušavanje principa transparentnosti |
| Povrede profesionalnih, etičkih pravila i pristrasno ponašanje |

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| Interna akta institucije |
| postojeći zakoni i podzakonska akta |

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| Negativna ocjena javnog mnjenja i gubitak povjerenja javnosti u rad institucije zbog nedovoljne transparentnosti i informisanja javnosti. |

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| Omogućiti dostupnost i preglednost relevantnih dokumenata na internet stranici | direktor | kontinuirano |

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 | RealizovanoRedovno ažurirana stranica bilten na sajtu Radio Kotora, objavljena i istaknuta sva relevantna dokumenta. |
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| Analiza rada svih u redakciji, posebno u smislu poštovanja profesionlanih standarda, programskih principa i Kodeksa novinara. | direktor | kontinuirano | RealizovanoPrimjena Pravilnika o programskim principima i profesionalnim standardima i mjesečno podnošenje Izvještaja - radnih lista. |
| neposredni rukovodioci |
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| 1.4 | Rukovođenje i upravljanje |

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| neispunjavanje obaveza koje su predviđene Zakonom o finansiranju političkih subjekata i izbornih kampanja  |

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| Zakon o finansiranju političkih subjekata i izbornih kampanja |

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| Nedovoljna transparentnost trošenja sredstava i zapošljavanja u toku izborne kampanje |

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| Redovno u toku izborne kampanje objavljivati i dostavljati Agenciji za sprječavanje korupcije sve dokumente shodno Zakonu o finansiranju političkih subjekata i izbornih kampanja (analitičke kartice, putne naloge i odluke o zapošljavanju sa pratećom dokumentacijom) | direktor |  |

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 | RealizovanoRedovno dostavljeni izvještaji Agenciji za sprečavanje korupcije (putni nalozi, analitičke kartice) i objavljivani. |
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| 1.5 | Rukovođenje i upravljanje |

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| direktor |
| neposredni rukovodioci |

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| nepoštovanje zakonske obaveze |

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| Zakon o finansiranju političkih subjekata i izbornih  |

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| Neblagovremeno objavljivanje cjenovnika usluga i oglašavanja političkih subjekata  |

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| Omogućiti dostupnost cjenovnika političkog marketinga, kao i relevantnih dokumenata  | direktor |  |

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 | Nije realizovanoU  |
| neposredni rukovodioci |
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| 1.5 | Rukovođenje i upravljanje |

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| direktor |
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| nepoštovanje zakonske obaveze |

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| kampanja |

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| tokom izborne kampanje; Nedostavljanje Agenciji za sprječavanje korupcije cjenovnika političkog marketinga Lokalnog javnog emitera „Radio Kotor“DOO |

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| na portalu Lokalnog javnog emitera „Radio Kotor“DOO |  |  |

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 | izvještajnom periodu nije bilo izbora, te ni političkog marketinga. |
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| Dostaviti Agenciji za sprječavanje korupcije i Agenciji za elektronske medije cjenovnik političkog marketinga Lokalnog javnog emitera „Radio Kotor“ DOO | direktor |  | Nije realizovanoU izvještajnom periodu nije bilo izbornih kampanja. |
| neposredni rukovodioci |
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| Redovno izvršavati propisane obaveze tokom trajanja izborne kampanje | direktor |  | Nije realizovanoU izvještajnom periodu nije bilo izbornih kampanja. |
| neposredni rukovodioci |
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| 2.1 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |
| svi zaposleni |

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| Narušavanje principa transparentnosti |
| Sukob interesa |

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| Zakon o sprječavanju korupcije |
| Etički kodeks |
| Zakoni i podzakonska akta |
| Obuke i seminari |
| Pojačan stručni nadzor |

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| Neblagovremeno i nepotpuno dostavljanje izvještaja o imovini i prihodima organa upravljanja (direktor i članovi Savjeta)Mogućnost nastanka sukoba interesa prilikom donošenja odluka i sprovođenja zakonskih procedura;Ne postoje jasni kriterijumi za objektivnu ocjenu rada i nagrađivanja službenika. |

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| Redovno dostavljati Izvještaje o imovini i prihodima javnih funkcionera | direktor |  |

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 | RealizovanoDostavljen je Izvještaj o prihodu i imovini direktorke, kao i predsjednice i članova/ca Savjeta, shodno propisanoj obavezi o prijavljivanju imovine državnih službenka i javnih funkcionera. |
| predsjednik i članovi Savjeta |
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| 2.1 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |
| svi zaposleni |

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| Narušavanje principa transparentnosti |
| Sukob interesa |

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| Zakon o sprječavanju korupcije |
| Etički kodeks |
| Zakoni i podzakonska akta |
| Obuke i seminari |
| Pojačan stručni nadzor |

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| Neblagovremeno i nepotpuno dostavljanje izvještaja o imovini i prihodima organa upravljanja (direktor i članovi Savjeta)Mogućnost nastanka sukoba interesa prilikom donošenja odluka i sprovođenja zakonskih procedura;Ne postoje jasni kriterijumi za objektivnu ocjenu rada i nagrađivanja službenika. |

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| Donijeti interno uputstvo za kontrolu i evidenciju postojanja sukoba interesa i periodična kontrola zahtjeva za izuzeće | direktor |  |

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 | RealizovanoPrimjenjivan je Zakon o sprječavanju korupcije i Etički kodeks. |
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| Povećanje transparentnosti prilikom ocjenjivanja i nagrađivanja službenika na način što će se rezultati ocjenjivanja i spisak nagrađenih službenika javno objavljivati na oglasnoj tabli | direktor | kontinuireno | RealizovanoOdluka o nagrađenim službenicima objavljena je na oglasnoj tabli. |
| neposredni rukovodioci |
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| 2.2 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| svi zaposleni |

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| Primanje nedozvoljenih poklona ili druge nedozvoljene koristi |

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| Zakoni i podzakonska akta |

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| Nedovoljna informisanost zaposlenih o obavezi prijavljivanja poklona |

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| Donijeti i objaviti obavještenje kojim će se svi službenici upoznati o obavezi prijavljivanja svih poklona a neposredni rukovodioci obavezati da ažurno vode evidenciju o primljenim poklonima i izvještavaju nadležnu službu | direktor | kontinuirano |

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 | RealizovanoU evidenciji Radio Kotora nije bilo prijavljenih poklona. |
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| Donijeti interno uputstvo o vođenju evidencije primljenih poklona zaposlenih | direktor |  | RealizovanoNije bilo prijavljenih poklona. |
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| 2.3 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |

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| Neprijavljivanje korupcije i drugih nezakonitih radnji |

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| Etički kodeks |
| Obuke i seminari |

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| Nedovoljno razvijen nivo svijesti zaposlenih za prijavljivanje korupcije i drugih nezakonitih radnji unutar institucije |

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

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 | RealizovanoSvi zaposleni su upoznati sa antikorupcijskim propisima. |
| neposredni rukovodioci |
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| 2.3 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| Neprijavljivanje korupcije i drugih nezakonitih radnji |

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| Etički kodeks |
| Obuke i seminari |

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| Nedovoljno razvijen nivo svijesti zaposlenih za prijavljivanje korupcije i drugih nezakonitih radnji unutar institucije |

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| Uvesti edukaciju prema ciljnim grupama, posebno prema službenicima koji pokrivaju rizične grupe poslova,najmanje 4 puta godišnje. Uvesti obavezu da se na svim kolegijumima raspravlja i o temi integriteta i prevencije korupcije kao jednoj od obaveznih tačaka dnevnog reda. | direktor | kontinuirano |

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 | Djelimično realizovanoU programskim sadržajima Radio Kotora aktualizovane su brojne teme koje tangiraju ovu oblast i proaktivno djeluju na suzbijanje korupcije. |
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| 2.4 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |
| odgovorno lice za prijem i postupanje po prijavi zviždača |

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| Neprijavljivanje korupcije i drugih nezakonitih radnji |
| ugrožavanje službenog lica kod otkrivanja i prijavljivanja sumnje na korupcju i druge povrede integriteta  |

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| Zakon o sprječavanju korupcije |
| Zakon o zaštiti tajnih podataka |
| Zakon o zaštiti diskriminacije na radnom mjestu |

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| Narušavanje zaštite identiteta i prava zviždača |

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| Postupati po preporukama Agencije za sprječavanje korupcije ( u slučajevima kad Agencija sprovodi postupak po prijavi) i izvještavati Agenciju o preduzetim radnjama | direktor | kontinuirano |

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 | Nije realizovanoNije bilo prijava o koruptivnim radnjama. |
| odgovorno lice za prijem i postupanje po prijavi zviždača |
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| 2.5 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |

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| Narušavanje integriteta institucije |
| Narušavanje principa transparentnosti |
| Nezakonit proces planiranja i sprovođenja procedure zapošljavanja |

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| Interna akta institucije |
| postojeći zakoni i podzakonska akta |
| Zakon o radu |

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| Nedovoljna transparentnost prilikom oglašavanja slobodnih radnih mjesta. |

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| Postupati po odredbama Zakona o radu i Pravilniku o unutrašnjoj organizaciji i sistematizaciji radnih mjesta,. | direktor | kontinuirano |

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 | RealizovanoRadna mjesta su popunjena prema Pravilniku o sistematizaciji radnih mjesta i kadrovskom politikom u postojećim okolnostima poslovanja. |
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| 2.6 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |
| rukovodioci organizacionih jedinica |

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| Nesavjestan rad |
| Neblagovremeno i neažurno obavljanje povjerenih poslova |
| Nestručan i neprofesionalan rad |

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| Interna akta institucije |
| Zakoni i podzakonska akta |

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| Nedostatak stručnog znanja i vještina kadra |

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| Obezbijediti sprovođenje plana i programa stručnog usavršavanja | direktor | kontinuirano |

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 | RealizovanoZaposleni su prisustvovali posebnim programima obuka, u zavisnosti od potreba  |
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| 2.6 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |
| rukovodioci organizacionih jedinica |

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| Nesavjestan rad |
| Neblagovremeno i neažurno obavljanje povjerenih poslova |
| Nestručan i neprofesionalan rad |

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| Interna akta institucije |
| Zakoni i podzakonska akta |

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| Nedostatak stručnog znanja i vještina kadra |

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| 2.7 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |
| rukovodioci organizacionih jedinica |

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| Neefikasna i neracionalna kadrovska politika |

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| Interna akta institucije |

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| Nedovoljni kadrovski kapaciteti u određenim organizacionim jedinicama |

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| Izvršiti procjenu potrebnog kadra za efikasno sprovođenje poslova iz nadležnosti institucije  | direktor | kontinuirano |

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 | RealizovanoProcjena je obuhvaćena Pravilnikom o organizaciji poslova i sistematizaciji radnih mjesta što je projektovano i Predlogom programskih obaveza za 2021 - 2023. godinu. |
| neposredni rukovodioci |
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| 2.8 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |
| rukovodioci organizacionih jedinica |
| ostali zaposleni  |

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| Sukob interesa |

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| Zakoni i podzakonska akta |
| Interna akta institucije |
| Podjela radnih zadataka |

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| Nedovoljno jasna podjela i razgraničenja sistema kontrole i vršenja ovlašćenja zbog velike koncetracije zadataka na samo jednoj osobi |

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| Adekvatno popunjavanje radnih mjesta u organizacionim jedinicama | direktor | kontinuirano |

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 | RealizovanoRadna mjesta su popunjena prema Pravilniku o sistematizaciji radnih mjesta i kadrovskoj politici u postojećim okolnostima poslovanja. |
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| 2.9 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |
| rukovodioci organizacionih jedinica |
| svi zaposleni |

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| Gubitak povjerenja građana u rad službenika i institucije |

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| Interna akta institucije |
| Zakoni i podzakonska akta |

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| Neadekvatno sprovođenje nadzora i kontrole nad radom organizacionih jedinica |

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| Redovno izvještavanje o sprovedenim kontrolamaPraćenje realizacije preporuka za unaprjeđenje rada  | direktor | kontinuirano |

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 | RealizovanoU godišnjim izvještajima evidentirane su kontrole i monitoring Agencije za elektronske medije, Agencije za komunikacije i poštansku  |
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| 2.9 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |
| rukovodioci organizacionih jedinica |
| svi zaposleni |

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| Gubitak povjerenja građana u rad službenika i institucije |

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| Neadekvatno sprovođenje nadzora i kontrole nad radom organizacionih jedinica |

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| 3.1 | Planiranje i upravljanje finansijama |

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| direktor |
| rukovodilac službe ekonomsko finansijskih poslova |

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| Neadekvatno planiranje i izvršavanje budžeta |

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| Edukacija |

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| Neadekvatno planiranje budžeta |

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| Osigurati učešće svih relevantnih subjekata i jedinica prilikom planiranja budžeta | rukovodilac službe ekonomsko finansijskih poslova | kontinuirano |

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 | RealizovanoNa radnim sastancima rukovodilac institucije i rukovodilac finansijske službe planiraju budžet Radio Kotora, uključujući i službenika za javne nabavke. |
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| Pohađati relevantne obuke i seminare na temu planiranja budžeta | rukovodilac finansijsko računovodstvenih poslova | kontinuirano | RealizovanoRukovodilac finansijske službe pohađao je obuke i seminare. |
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| 3.2 | Planiranje i upravljanje finansijama |

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| direktor |
| rukovodilac službe ekonomsko finansijskih poslova |

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| Neadekvatno planiranje i izvršavanje budžeta |

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| Zakoni i podzakonska akta |

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| Neadekvatno i nedovoljno transparentno trošenje budžetskih sredstava |

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| Redovno sprovođenje unutrašnjih finansijskih kontrola | direktor | kontinuirano |

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 | RealizovanoAngažovana je nezavisna revizorka, shodno Zakonu o elektronskim medijima. |
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| Angažovanje nezavisnog revizora |  | jednom godišnje | RealizovanoAngažovana je nezavsina revizorka, shodno Zakonu o  |
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| 3.2 | Planiranje i upravljanje finansijama |

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| direktor |
| rukovodilac službe ekonomsko finansijskih poslova |

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| Neadekvatno planiranje i izvršavanje budžeta |

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| Zakoni i podzakonska akta |

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| Neadekvatno i nedovoljno transparentno trošenje budžetskih sredstava |

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 | elektronskim medijima. |
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| 3.3 | Planiranje i upravljanje finansijama |

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| direktor |
| službenik za javne nabavke |

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| Neadekvatno sprovođenje postupaka javnih nabavki |
| Nedozvoljeno lobiranje ili drugi nejavni uticaj |
| Sukob interesa |
| drugi oblici kršenja principa transparentnosti |
| nezakonitost i narušavanje integriteta u postupcima javnih nabavki |

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| Zakoni i podzakonska akta |
| portal javnih nabavki |

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| Nedovoljna transparentnost javnih nabavki |

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| Objavljivati pozive za učešće u postupcima javnih nabavki i druge dokumente | direktor | kontinuirano |

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 | RealizovanoUsvojen je Izvještaj o javnim nabavkama, kao i Plan javnih nabavki za 2022. godinu (objavljeno na portalu javnih nabavki). Tokom 2022. godine nije bilo sprovedenih postupaka. |
| službenik za javne nabavke |
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| Unijeti antikorupcijsku klauzulu u sve ugovore o javnim nabavkama | službenik za javne nabavke | kontinuirano | Nije realizovanoNije bilo sprovedenih postupaka javnih nabavki tokom 2022. godine. |
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| 3.4 | Planiranje i upravljanje finansijama |

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| neposredni rukovodioci |
| službenik za javne nabavke |

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| Iskorišćavanje javne funkcije ili službenog položaja |

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| Etički kodeks |
| Inspekcijska kontrola |
| Zakoni i podzakonska akta |

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| Davanje prednosti određenoj firmi u procesu javne nabavke, na način da se tehnička specifikacija prilagođava za određenu firmu. |

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| Promjena sistema tako da više eksperata radi na tehničkoj specifikaciji koja ne smije sadržati diskriminatorske kriterijume. | neposredni rukovodioci | kontinuirano |

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 | Nije realizovanoNije bilo sprovedenih postupaka javnih nabavki tokom 2022. godine. |
| službenik za javne nabavke |
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| 4.1 | Čuvanje i bezbjednost podataka i dokumenata |

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| direktor |
| organizator administrativnih i  |

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| Curenje informacija |
| Ugrožavanje zaštite podataka |

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| Pojačan stručni nadzor |

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| Neadekvatno postupanje sa službenom dokumentacijom i  |

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| Izvršiti analizu da li su mjere fizičke i tehničke bezbjednosti efikasne i primljenjive | direktor | kontinuirano |

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 | RealizovanoPrimjenjene mjere zaštite  |
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| 4.1 | Čuvanje i bezbjednost podataka i dokumenata |

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| opštih poslova,  |

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| Curenje informacija |
| Ugrožavanje zaštite podataka |

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| Pojačan stručni nadzor |

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| informacijama zbog nedovoljnih mjera fizičke bezbjednosti i tehničke sigurnosti |

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 | informacija i podataka obezbjeđuju potreban nivo zaštite. |
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| Obezbijediti kontinuirani stručni nadzor nad podacima | direktor | kontinuirano | RealizovanoRedovno se kontrolišu uslovi koji obezbjeđuju zaštitu podataka. Stepen tajnosti podataka je usaglašen sa Pravilnikom o poslovnoj tajni Radio Kotora. |
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| 4.2 | Čuvanje i bezbjednost podataka i dokumenata |

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| rukovodioci organizacionih jedinica |

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| Curenje informacija |
| Ugrožavanje zaštite podataka |

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| Pojačan stručni nadzor |

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| Nedovoljna IT bezbjednost podataka |

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| Obučiti zaposlene o bezbjednom rukovanju podacima u elektronskoj formi | rukovodioci organizacionih jedinica | kontinuirano |

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 | RealizovanoRukovodilac IT službe redovno obavlja kontrolu i informiše zaposlene o rukovanju podacima u elektronskoj formi, a sve u cilju bezbjednosti i zaštite podataka. |
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| 4.3 | Čuvanje i bezbjednost podataka i dokumenata |

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| rukovodilac službe ekonomsko finansijskih poslova |
| organizator administrativnih i opštih poslova,  |

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| Ugrožavanje zaštite podataka |

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| Zakoni i podzakonska akta |

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| Nedovoljna zaštita povjerljivih podataka zbog neadekvatnih mjera administrativne zaštite tajnih podataka |

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| Donijeti odluke kojim će se označiti stepen tajnosti podataka koji su u posjedu institucije | direktor | kontinuirano |

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 | RealizovanoPravilnik o poslovnoj tajni na snazi je od 2020. godine. |
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| 4.3 | Čuvanje i bezbjednost podataka i dokumenata |

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| rukovodilac službe ekonomsko finansijskih poslova |
| organizator administrativnih i opštih poslova,  |

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| Ugrožavanje zaštite podataka |

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| Zakoni i podzakonska akta |

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| Nedovoljna zaštita povjerljivih podataka zbog neadekvatnih mjera administrativne zaštite tajnih podataka |

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| 4.4 | Čuvanje i bezbjednost podataka i dokumenata |

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| rukovodilac službe ekonomsko finansijskih poslova |
| organizator administrativnih i opštih poslova |

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| Curenje informacija |
| Nesavjestan rad |
| Nestručan i neprofesionalan rad |

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| Edukacija |
| Interna akta institucije |

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| Neadekvatan ili neefikasan sistem kontrole nad prijemom i razvrstavanjem dokumentacije |

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| Vršiti redovnu kontrolu nad prijemom i razvrstavanjem dokumentacije u cilju sprječavanja gubljenja, oštećenja ili neevidentiranja dokumentacije | direktor | kontinuirano |

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 | RealizovanoSva primljena i izdata dokumenta evidentiraju se kroz djelovodnik Radio Kotora i čuvaju se u arhivi. |
| rukovodilac službe ekonomsko finansijskih poslova |
| organizator administrativnih i opštih poslova |
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| 5.1 | slobodan pristup informacijama |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |
| drugi oblici kršenja principa transparentnosti |

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| Zakon o slobodnom pristupu informacijama |

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| Neobjavljivanje dokumenata shodno Zakonu o slobodnom pristupu informacijama, kao i ostalih informacija od značaja za građane |

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| Objaviti Vodič za slobodan pristup informacijama na internet stranici institucije | direktor | kontinuirano |

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 | RealizovanoVodič za slobodan pristup informacijama objavljen je na sajtu RadioKotora. |
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| Redovno objavljivati i ažurirati propise koji regulišu rad ustanove na internet stranici, u skladu sa članom 12 ZSPI | direktor | kontinuirano | RealizovanoRedovno su objavljivani i ažurirani propisi koji regulišu rad ustanove na internet stranici . |
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| 5.2 | slobodan pristup informacijama |

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| Donošenje nezakonitih odluka |
| Narušavanje integriteta institucije |

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| Zakon o slobodnom pristupu informacijama |
| Vodič za slobodan pristup informacijama |

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| Neosnovano uskraćivanje podnosiocu zahtjeva pristup informaciji, neobavještavanje podnosioca zahtjeva o rješavanju zahtjeva |

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| Izvještavati o broju podnijetih i riješenih zahtjeva | direktor | kontinuirano |

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 | Nije realizovanoNije bilo zahtjeva za slobodan pristup informacijama. |
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| 5.2 | slobodan pristup informacijama |

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| direktor |

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| Donošenje nezakonitih odluka |
| Narušavanje integriteta institucije |

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| Zakon o slobodnom pristupu informacijama |
| Vodič za slobodan pristup informacijama |

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| Neosnovano uskraćivanje podnosiocu zahtjeva pristup informaciji, neobavještavanje podnosioca zahtjeva o rješavanju zahtjeva |

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| 6.1 | odnosi s javnošću |

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

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| Zakoni i podzakonska akta |
| Princip četiri oka |

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| Nedovoljna informisanost javnosti o radu institucije.Nedovoljna i nekoordinisana saradnja između različitih organizacionih jedinica .  |

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| Povećati broj informacija o radu institucije  | direktor | kontinuirano |

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 | RealizovanoPutem programskih sadržaja i internet stranice Radio Kotora javnost je upoznata sa radom i planovima Lokalnog javnog emitera Radio Kotor DOO. |
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| Unaprijediti kvalitet i kvantitet informacija na web stranici institucije | direktor | kontinuirano | RealizovanoUnaprijeđen je kvalitet i kvantitet informacija na web stranici radiokotor.info. |
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| Sprovoditi ispitivanje javnog mnjenja o radu institucije | direktor | kontinuirano | RealizovanoObjavljene su ankete sa građanima o radu Radio Kotora. |
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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**