**LOKALNI JAVNI EMITER „RADIO KOTOR“ DOO**

**PLAN INTEGRITETA**

Kotor, 26.09.2024. godine

„RADIO KOTOR“DOO

ADRESA: Stari grad 320

85330 Kotor

TELEFON:032-325-842 i 325-843

E-MAIL: radiokotor@t-com.me

IME I ZVANJE ODGOVORNOG LICA ZA IZRADU I SPROVOĐENJE PLANA INTEGRITETA (MENADŽERA INTEGRITETA):

Irena Stanovčić, menadžerka nautičkog turizma i upravljanja marinama (Fakultet za mediteranske poslovne studije Tivat) raspoređena na radno mjesto rukovoditeljka službe ekonomsko-finansijskih poslova.

DATUM I BROJ RJEŠENJA O ODREĐIVANJU MENADŽERA INTEGRITETA:

33 od 04.02.2020. godine

DATUM I BROJ RJEŠENJA O ODREĐIVANJU ČLANOVA RADNE GRUPE ZA IZRADU PLANA INTEGRITETA:

01-183/24 od 05.08.2024. godine

ČLANOVI RADNE GRUPE:

Irena Stanovčić

Savo Popović

Tamara Vuković

DATUM POČETKA IZRADE: 15.08.2024. godine

DATUM ZAVRŠETKA IZRADE: 23.09.2024. godine

DATUM USVAJANJA PLANA INTEGRITETA: 26. 09. 2024. godine

SADRŽAJ:

1. RJEŠENJE O ODREĐIVANJU ODGOVORNOG LICA ZA ZA IZRADU I SPROVOĐENJE PLANA INTEGRITETA (MENADŽERA INTEGRITETA)

2. RJEŠENJE O ODREĐIVANJU ČLANOVA RADNE GRUPE ZA PRIPREMU I IZRADU PLANA INTEGRITETA

3. PROGRAM IZRADE I SPROVOĐENJA PLANA INTEGRITETA

4. METODOLOGIJA PROCJENE INTENZITETA RIZIKA

5. OBRAZAC PLANA INTEGRITETA

6. ODLUKA O USVAJANJU I STUPANJU NA SNAGU PLANA INTEGRITETA

1. RJEŠENJE O ODREĐIVANJU ODGOVORNOG LICA ZA IZRADU I SPROVOĐENJE PLANA INTEGRITETA

„RADIO KOTOR“ DOO

Djel.broj: 33

Kotor, 04.02.2020. godine

Na osnovu člana 74 stav 1 Zakona o sprječavanju korupcije ("Sl. list Crne Gore", br. 53/14), v.d. direktorice Radio Kotora Vjera Banićević, donosi

**RJEŠENJE**

**o određivanju odgovornog lica za izradu i sprovođenje plana integriteta**

1)Irena Stanovčić, menadžerka nautičkog turizma i upravljanja marinama (Fakultet za mediteranske poslovne studije Tivat) raspoređena na radno mjesto rukovoditeljka službe ekonomsko-finanijskih poslova, određuje se za lice odgovorno za izradu i sprovođenje plana integriteta (menadžerka integriteta).

2) Menadžer/ka integriteta obavljaće naročito poslove koji se odnose na:

* rukovođenje radnom grupom za izradu plana inegriteta;
* koordinaciju i učešće u pripremi programa izrade plana integriteta;
* koordinaciju i učešće u sakupljanju i analizi potrebne dokumentacije koja se odnosi na funkcionisanje organa vlasti, a koja predstavlja osnov za procjenu rizika i izradu plana integriteta;
* nadziranje sprovođenja mjera za poboljšanje integriteta;
* u saradnji sa svim orgaizacionim jedinicama sačinjavanje izvještaja o sprovođenju plana integriteta.

3) Prava i obaveze menadžera integriteta iz tačke 1 dispozitiva ovog rješenja počinju teći od 04.02.2020. godine, čime prestaje da važi Rješenje br.01-89/1 od 02.04.2018. godine.

**Obrazloženje**

Zakonom o sprječavanju korupcije ("Sl. list Crne Gore", br. 53/14) uvedena je obaveza donošenja planova integriteta za sve organe vlasti, u skladu sa Pravilima za izradu i sprovođenje plana integriteta. S tim u vezi, a shodno članu 74 stav 1 istog Zakona propisano je da starješina, odnosno odgovorno lice u organu vlasti rješenjem određuje menadžera integriteta koji je odgovoran za izradu i sprovođenje plana inegriteta.

Na osnovu izloženog riješeno je kao u dispozitivu ovog rješenja.

**PRAVNA POUKA**: Protiv ovog Rješenja može se izjaviti žalba nadležnoj Komisiji za žalbe u roku od 8 dana od dana prijema istog.

**VD Direktorica,**

**s.r. Vjera Banićević**

DOSTAVLJENO:

- Imenovanoj

- dosije

- a/a

2. RJEŠENJE O FORMIRANJU RADNE GRUPE ZA PRIPREMU I IZRADU PLANA INTEGRITETA

„RADIO KOTOR“ DOO

Broj: 01- 183/1/24

Kotor, 05.08.2024. godine

Na osnovu člana 74 Zakona o sprečavanju korupcije, („Sl. List CG.“ br. 53/14,42/17) v.d. direktorke „Radio Kotora“, donosi

**RJEŠENJE**

**o formiranju radne grupe za pripremu i izradu plana integriteta**

1. Obrazuje se radna grupa za pripremu i izradu plana integriteta, u sljedećem sastavu:

- Irena Stanovčić

- Savo Popović

- Tamara Vuković

***Obrazloženje***

Zadatak radne grupe je da pripremi program izrade plana integriteta, prikupi i analizira potrebnu dokumentaciju koja se odnosi na funkcionisanje organa vlasti, a koja predstavlja osnov za procjenu rizika i izradu plana integriteta, upozna zaposlene sa potrebom donošenja plana integriteta i dostavi izrađen prijedlog plana integriteta starješini/odgovornom licu u organu vlasti na usvajanje, zaključno sa 03.09.2024. godine.

Na osnovu izloženog, riješeno je kao u dispozitivu ovog rješenja.

**PRAVNA POUKA**: Protiv ovog Rješenja može se izjaviti žalba nadležnoj Komisiji za žalbe u roku od 8 dana od dana prijema istog.

**VD Direktorke,**

**s.r. Vjera Banićević**

DOSTAVLJENO:

- Imenovanim

- dosije

- a/a

3. PROGRAM IZRADE PLANA INTEGRITETA

ORGAN VLASTI: „RADIO KOTOR“ DOO  
  
ODGOVORNO LICE: VJERA BANIĆEVIĆ  
  
ČLANOVI RADNE GRUPE: IRENA STANOVČIĆ, SAVO POPOVIĆ, TAMARA VUKOVIĆ   
DATUM DONOŠENJA RJEŠENJA: 05.08.2024. godine  
  
DATUM POČETKA IZRADE: 15.08.2024. godine  
  
  
I. FAZA

OSNIVANJE RADNE GRUPE I PRIKUPLJANJE INFORMACIJA  
DATUM: 05.08.2024. godine  
  
1. PRIPREMNA FAZA  
Rukovodilac donosi odluku o imenovanju radne grupe (Rukovodilac)

Najkasnije do: 05.08.2024. godine

2. Radna grupa sakuplja potrebnu dokumentaciju, informacije od zaposlenih i priprema program izrade plana integriteta (Radna grupa)

Najkasnije do: 20.08.2024. godine

3. Upoznavanje zaposlenih sa potrebom donošenja plana integriteta (Radna grupa i Rukovodilac)

Najkasnije do: 20.08.2024. godine

II. FAZA   
UTVRĐIVANJE POSTOJEĆIH MJERA   
DATUM: 30.08.2024. godine

PROCJENA POSTOJEĆEG STANJA I UTVRĐIVANJE INICIJALNIH FAKTORA RIZIKA

1. Intervjui sa zaposlenima

2. Popunjavanje anonimnog upitnika putem interneta (Radna grupa)

3. Ocjena izloženosti rizicima i razgovor sa zaposlenima (Radna grupa)

Najkasnije do: 30.08.2024. godine  
  
  
III. FAZA   
PLAN MJERA ZA PODIZANJE NIVOA INTEGRITETA  
DATUM: 02.09.2024. godine  
  
1. Upoznavanje zaposlenih sa rizicima narušavanja integriteta, ocjenom izloženosti i planom mjera za poboljšanje integriteta (Rukovodilac)

2. Popunjavanje obrasca PI i priprema konačnog izveštaja (Radna grupa)

3. Usvajanje izrađenog plana integriteta zajedno sa mjerama poboljšanja (Rukovodilac)

4. Završena izrada plana integriteta institucije najkasnije do: 23.09.2024. godine

4. METODOLOGIJA PROCJENE INTENZITETA RIZIKA

LEGENDA TERMINA I SIMBOLA

Intenzitet rizika dobija se množenjem vjerovatnoće i posljedice, upotrebom matrice rizika „vjerovatnoća(1-10) x posljedica(1-10) ” koja je prikazana na slici ispod.

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **POSLJEDICA** | **Ozbiljna** | 10 |  |  |  |  |  |  |  |  |  |
| 9 |  |  |  |  |  |  |  |  |  |
| 8 |  |  |  |  |  |  |  |  |  |
| **umjerena** | 7 |  |  |  |  |  |  |  |  |  |
| 6 |  |  |  |  |  |  |  |  |  |
| 5 |  |  |  |  |  |  |  |  |  |
| 4 |  |  |  |  |  |  |  |  |  |
| **mala** | 3 |  |  |  |  |  |  |  |  |  |
| 2 |  |  |  |  |  |  |  |  |  |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |
| Intenzitet rizika  (posljedicaj **x** vjerovatnoća) | | **niska** | | | **srednja** | | | | **visoka** | | |
| **VJEROVATNOĆA** | | | | | | | | | |

Ukupna procjena rizika od korupcije i drugih oblika narušavanja integriteta

•/V Rizik visok intenziteta – Korupcija ili drugi oblici narušavanja integriteta su već prisutni u ovom procesu ili je vrlo vjerovatno da će se pojaviti

•/S Rizik srednjeg intenziteta – Pojava korupcije ili drugih oblika narušavanja integriteta u ovom procesu je moguća, ali se mjerama kontrole upravlja tim rizikom

•/N Rizik niskog intenziteta – Mala je vjerovatnoća da će se pojaviti korupcija ili drugi oblici 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 korupcije ili drugih oblika narušavanja integriteta sa »veoma malom« posljedicom (rizik niskog intenziteta), ocjene od 16-48 predstavljaju »srednju vjerovatnoću« pojave korupcije ili drugih oblika narušavanja integriteta sa »umjerenom« posljedicom (rizik srednjeg intenziteta) dok ocjene od 49-100 znači »skoro izvjesnu« pojavu korupcije ili drugih oblika narušavanja integriteta sa »veoma velikom« posljedicom (rizik visokog intenziteta).

Status rizika od prethodne provjere

↔ Bez promjena

↑ Povećan rizik

↓ Smanjen rizik

Datum provjere: 22.09.2024.

Provjeru izvršio: Irena Stanovčić

**\***Legenda: **\*\***Legenda:

|  |  |  |  |
| --- | --- | --- | --- |
| procjena rizika | nizak | Srednji | visok |
|  | 1-15 | 16-48 | 49-100 |

|  |  |  |  |
| --- | --- | --- | --- |
| Napredak stanja od prethodne provjere | bez promjena | povećan rizik | smanjen rizik |
| **↔** | **↑** | **↓** |

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Plan integriteta | | | | | | | | | | | | |
| 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 | | |  | | --- | | Diskriminacija, ograničenje i uskraćivanje prava zaposlenog kod otkrivanja i prijavljivanja sumnje na korupciju i druge povrede integriteta | | Donošenje nezakonitih odluka | | Široka diskreciona ovlašćenja u donošenju akata i odluka koje se odnose na rukovođenje i upravljanje institucijom | | |  | | --- | | 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. | | |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | |  | | --- | | 5 | | |  | | --- | | 5 | | |  | | --- | | 25 | | | | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Sprovođenje procedura odlučivanja, donošenja opštih i pojedinačnih akata Sprovođenje nadzornih i kontrolnih mehanizama. | direktor | kontinuirano | |  | | --- | | ↑ | |  | |  | |  |  | |  |  |  | |  |  |  |  | |  |  |  |  | |  |  |  |  | | Puna transparentnost u procedurama odlučivanja u oblastima iz nadležnosti institucije. | direktor | kontinuirano |  | |  | |  |  | |  |  |  | |  |  |  |  | |  |  |  |  | |  |  |  |  | | | | | | | | | | | | | | |
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6. ODLUKA O USVAJANJU I STUPANJU NA SNAGU PLANA INTEGRITETA

„ RADIO KOTOR“ DOO

Broj: 01- 251 /24

Kotor, 26.09.2024. godine

Na osnovu člana 71 stav 1 Zakona o sprječavanju korupcije ("Sl. list Crne Gore", br. 53/14,42/17), direktorica Lokalnog javnog emitera „Radio Kotor“ DOO, donosi

**ODLUKU**

1) Usvaja se i stupa na snagu Plan integriteta “RADIO KOTOR“DOO.

2) Zadužuje se menadžer integriteta da najmanje jednom godišnje podnese pisani izvještaj o realizaciji mjera iz plana integriteta.

3) Zadužuju se svi zaposleni u organu vlasti da na zahtjev menadžera integriteta dostave sve potrebne informacije i dokumenta, neophodna za efikasno sprovođenje plana integriteta.

**Obrazloženje**

Zakonom o sprječavanju korupcije ("Sl. list Crne Gore", br. 53/14,42/17) uvedena je obaveza donošenja planova integriteta, u skladu sa Pravilima za izradu i sprovođenje plana integriteta, koja donosi Agencija za sprječavanje korupcije. S tim u vezi, Rješenjem br. 01-183/1/24 od 05.08.2024. godine, formirana je radna grupa za pripremu i izradu plana integriteta, koja je u kontinuitetu radila od 15.08. 2024. god. do 23.09. 2024. god. i koja je pripremila i direktorici dostavila na odobravanje i usvajanje prijedlog Plana integriteta, koji je u cijelosti 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.

**VD Direktorke,**

**s.r. Vjera Banićević**

DOSTAVLJENO:

- na oglasnoj tabli

- a/a