

Predlagatelj sprememb ZJA
Ministrstvo za javno upravo
Tržaška cesta 021
1000 Ljubljana

Številka: 029-1/2017/24
Datum: 7. sept. 2017

PRIPOMBE NACIONALNE AGENCIJE RS ZA KAKOVOST V VISOKEM ŠOLSTVU K PREDLOGU ZAKONA O SPREMEMBAH IN DOPOLNITVAH ZAKONA O JAVNIH AGENCIJAH – PRVA OBRAVNAVA

Na Nacionalni agenciji RS za kakovost v visokem šolstvu (v nadaljevanju: NAKVIS) smo 6. julija 2017 iz medijskih objav ugotovili, da se pripravlja sprememba statusa NAKVIS oziroma da naj bi po spremembi zakonodaje spadal med javne agencije. Predvidevali smo, da gre za pomoto, saj nikoli nismo spadali mednje. NAKVIS je bil ustanovljen na podlagi zakona o visokem šolstvu (v nadaljevanju: ZViS) - ob upoštevanju evropskih standardov in smernic za zagotavljanje kakovosti v evropskem visokošolskem prostoru (Standards and Guidelines for Quality Assurance in the European Higher Education Area; v nadaljevanju: ESG http://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf) - **kot oseba javnega prava in neposredni nevladni proračunski uporabnik (51e. člen ZViS)**. Res smo imeli in še imamo težave pri vpisu v sodni register (vpisan je kot javna agencija), čeprav je Višje sodišče v Ljubljani z odločbo št. VSL0063412 z dne 26. 5. 2010 (v prilogi) spremenilo sklep sodišča prve stopnje (ki je NAKVIS v sodni register vpisalo kot javno agencijo; kljub temu da takega predloga nismo nikoli podali) tako, da je predlog za vpis zavrnilo. Višje sodišče je ugotovilo da niti iz ZViS, ki je zakonska podlaga za ustanovitev predlaganega subjekta vpisa, ne izhaja, v kateri od znanih pravnoorganizacijskih oblik oseb javnega prava naj bi deloval NAKVIS.

Vodstvo NAKVIS je po objavi v medijih takoj ukrepalo in predsedniku vlade ter pristojnim ministrom poslalo pismo, v katerem pojasnjuje, zakaj za NAKVIS ne morejo veljati določbe zakona o javnih agencijah.

Na NAKVIS smo prav zaradi tega zelo skrbno pregledali predlog Zakona o spremembah in dopolnitvah Zakona o javnih agencijah – prva obravnava (v nadaljevanju: predlog ZJA), objavljenega na e-Demokraciji, in ugotovili, da so **predlagane spremembe popolnoma neprimerne (nesprejemljive), zato jih v celoti zavračamo. Poudarjamo, da predlagana ureditev NAKVIS ne bi več omogočala delovanja v skladu z ESG. Najbolj nesprejemljivo je, da iz predloga ZJA izhaja, da:**



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- **spada NAKVIS pod »režim« javnih agencij po ZJA, kar pomeni, da ni več neodvisen;**
- **ga nadzoruje vlada oziroma pristojno ministrstvo,**
- **člane sveta imenuje ustanovitelj,**
- **izgubi organizacijsko in finančno neodvisnost,**
- **ne bo več neodvisnega pritožbenega organa, saj ga bo nadomestilo ministrstvo.**

NAKVIS je bil – po dolgotrajnih prizadevanjih njegovih predhodnikov za neodvisnost in ustrezno zakonodajo, ki je to neodvisnost uzakonila - leta 2013 vpisan v Evropski register zaupanja vrednih agencij za kakovost v visokem šolstvu (The European Quality Assurance Register for Higher Education; v nadaljevanju: EQAR (www.eqar.eu)), na začetku leta 2015 pa je postal polnopravni član Evropskega združenja agencij za kakovost v visokem šolstvu (The European Association for Quality Assurance in Higher Education; v nadaljevanju ENQA (www.engq.eu)). S tem je slovenski visokošolski prostor postal enakovredni del evropskega, pa tudi širšega visokošolskega prostora. **Mednarodno priznanje NAKVIS na najvišji ravni zahteva izpolnjevanje ESG standardov.** Samo v Sloveniji je obstoj agencije za kakovost nesmiseln. Če agencija ni mednarodno priznana, vpetost v evropski in širši prostor ni zagotovljena, še več, **vprašljivo je tudi priznavanje izobrazbe, diplom in kompetenc diplomantov zunaj naših meja.** S tem je povezana kredibilnost slovenskih visokošolskih zavodov in skladnost slovenskega visokošolskega prostora z evropskim visokošolskim prostorom (EHEA), ki je odraz 18-letnega sodelovanja in političnih odločitev 47 držav (med njimi tudi Slovenije, ki je podpisnica deklaracij in komuniquejev na področju visokega šolstva) za vzpostavitev EHEA. Zaveza sodelujočih držav je slediti skupnim vrednotam v EHEA, ki jih natančno določajo tudi standardi ESG.

PRIZADEVANJA PREDHODNIKOV NAKVIS ZA NEODVISNOST V SKLADU Z ESG:

V devetdesetih letih prejšnjega stoletja in do leta 2007 je bila za kakovost v visokem šolstvu zadolžena Nacionalna komisija RS za kvaliteto v visokem šolstvu (NKKVŠ, angleško QACS). Leta 2006 je oddala vlogo za članstvo v ENQA in bila septembra 2007 zavrnjena. Večina razlogov za zavrnitev je bila povezana z neodvisnostjo agencije, kadrovskimi in finančnimi viri ter organizacijsko strukturo:

“ independence

The independence of QACS needs much more clarification in terms of its autonomous responsibility for its operations; operational independence from higher education institutions and governments (e.g. the administrative services are performed by the Ministry); the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes.” (iz obrazložitve k zavrnilnemu pismu ENQA z dne 19. septembra 2017)

Zavrnilno pismo je bilo poslano v času, ko je naloge NKKVŠ prevzemal takratni Svet RS za kakovost v visokem šolstvu (SVŠ) oziroma njegov evalvacijski senat. Začela so se intenzivna prizadevanja za ustrezen ureditev statusa organa za kakovost v Sloveniji, kar bi omogočilo njegovo mednarodno priznanje. Strokovna služba SVŠ, takratni Urad v sklopu ministrstva, pristojnega za visoko šolstvo, je takratno ministrstvo in vlado tudi pisno opozarjala, da je treba ob ustanavljanju ustreznega organa za kakovost (takrat je bil govor o subjektu, imenovanem agencija, po zgledu večine evropskih držav, ne pa tudi o tako poimenovani pravnoorganizacijski

obliki) upoštevati pogoje ENQA, EQAR oziroma ESG. Posebej je treba paziti, da bodo zagotovljeni oziroma nedvoumni:

“- **status agencije**; da bo formalno priznana v evropskem visokošolskem prostoru kot agencija, odgovorna za zagotavljanje kakovosti, ustanovljena na zakonski podlagi;

- **virji agencije**; imeti mora tako lastne človeške in finančne vire zato, da je sposobna organizirati in izpeljati akreditacijske in evalvacijske postopke na učinkovit in pravilen (predpisan) način – z ustrezno skrbjo in ukrepi za lasten razvoj;

- **neodvisnost agencije**; imeti mora avtonomno pristojnost za svoje delovanje, tako da na ugotovitve in priporočila iz njenih evalvacijskih in akreditacijskih poročil ne morejo vplivati drugi, npr. visokošolski zavodi, ministrstvo... To neodvisnost mora zagotoviti z ukrepi, kot so: predpisi, zakonodaja, imenovanje in izbira zunanjih strokovnjakov oz. evalvatorjev, določitev postopkov za zagotavljanje, spremljanje in ugotavljanje kakovosti... poudarila je, da določbe o agenciji v ZVŠ iz leta 2004, sicer razveljavljene leta 2006, niso ustrezne, ker gre za agencijo v sestavi ministrstva.”

Prvi korak k neodvisnosti je bila ustanovitev Sekretariata SVŠ s spremembo ZViS leta 2008 (Uradni list RS, št. 64/2008), nastalo tudi na podlagi ugotovitev Ustavnega sodišča v odločbi št. U-I-370/06. Iz teh izhaja, da je bila bistvena sprememba zakonske ureditve položaja SVŠ, ki je bila uvedena z ZViS-E (Uradni list RS, št. 94/06), prav določitev SVŠ kot neodvisnega in samostojnega organa....

Sledil je obisk dr. A. Hopbacha, podpredsednika ENQA, na Sekretariatu Sveta (decembra 2008): podpredsednik je pohvalil delo SVŠ ter ugotovil, da so evalvacije v skladu z ESG, opozoril pa je na dejstvo, da bo težave pri včlanitvi v ENQA povzročal postopek oziroma način **imenovanja članov SVŠ - vlada ne bi smela imeti možnosti izbire med različnimi kandidati oziroma vpliva nanjo**. Gre za neodvisnost, zato je treba to v novi agenciji, ki bo po spremembi ZViS (takrat se je že pripravljala) prevzela naloge SVŠ, ustrezno urediti (npr. imenovanje v svet agencije, tudi imenovanje direktorja...).

Konec leta 2009 je naposled začela veljati novela ZViS, ki je uzakonila neodvisno agencijo, torej NAKVIS (Uradni list RS, št. 86/2009; ZViS-G). Delovati je začel marca leta 2010 in imel - predvsem zaradi imena "agencija" - kar nekaj težav pri vpisu v sodni register, na kar smo uvodoma že opozorili. S trdim delom in prizadevanjem za priznanje in prepoznavnost v slovenskem in evropskem visokošolskem prostoru, aktivnim delovanjem doma in v tujini, smo bili leta 2012, ko smo vložili vlogo za vpis v EQAR, pripravljene na prvo zunanjo evalvacijo mednarodne skupine strokovnjakov oziroma na presojo izpolnjevanja ESG.

VPIS V EQAR:

Iz poročila mednarodne komisije o zunanji evalvaciji NAKVIS zaradi vpisa v EQAR (v nadaljevanju: komisija EQAR), je razvidno, da NAKVIS (angleško: SQAA) v celoti izpolnjuje ESG glede uradnega statusa in neodvisnosti:

“ESG 3.2 Official status

Standard:

Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have

an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

Evidence:

SQAA in its current form was established in 2010 with the Resolution on the Founding of the Slovenian Quality Assurance Agency for Higher Education under Article 51.e. of Law on Higher education (LoHE, ZViS in Slovenian) by the Government of the Republic of Slovenia (Official Gazette of the Republic of Slovenia, No 114/2009). SQAA is an independent, national accreditation agency funded from the government budget and operating as a legal entity under public law. Its accreditation decisions carry legal consequences for HEIs under evaluation, which ought to subject themselves to accreditation.

Conclusion: fully compliant.

3.6 Independence

Standard:

Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

Guidelines:

An agency will need to demonstrate its independence through measures, such as:

- *its operational independence from higher education institutions and governments*
- *is guaranteed in official documentation (e.g. instruments of governance or legislative acts);*
- *the definition and operation of its procedures and methods, the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence;*
- *while relevant stakeholders in higher education, particularly students/learners, are consulted in the course of quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.*

Evidence:

SQAA is an independent, national accreditation agency funded from the government budget and operating as a legal entity under public law. **It has the status of a direct non-governmental budget spending authority, which negotiates its budget directly with the Ministry of Finance.** Its accreditation decisions carry legal consequences for HEIs under evaluation, which ought to subject themselves to accreditation.

The Council is the decision-making body of the Agency and consists of 11 members who are appointed by the stakeholders in higher education as follows (Article 51h)...

Article 51h of the law stipulates that: **"Members of the Agency Council shall act in an expert, independent and autonomous manner and shall not be bound by the decisions, positions and instructions of institutions that appointed them or of other institutions."** In accordance with Article 51h, the rectors and vice-chancellors of universities, deans, members of senates of universities, of the universities' members or of private higher education institutions

or other organisations providing higher education, and headmasters or directors of higher vocational colleges, may not be appointed to the SQAA Council...

The Agency has certain discretion to set up detailed accreditation procedures and criteria. In accordance with Article 51e it is „independent and autonomous in its operation“. SQAA is guaranteed by law the independence to design criteria for external evaluation (Article 51f).

Analysis:

SQAA operates fully independent of the government, HEIs and stakeholder organisations. Council members are not responsible to the institutions or government. Members of the Council are getting dismissed if proven not to be independent. When a particular decision is made in which they have a potentially conflicting interest, they have to leave the room and the others vote. In each Council session there are approximately 5 abstainments of decision-making.

Also assured is the independence of expert panels carrying out the assessments, and bearing responsibility for writing the assessment reports...

The Appeal Committee is also independent; the profile of the people that can fill the positions for this committee is very strict due to the law. There is no interference between the Council and the Appeal Committee...

The legal provisions confirm the operational independence of the Agency. **Notwithstanding the regulations, the framework and procedures may come under pressure from politicians and the Minister. Indicative of that fact is a case last year when attempts were made to amend the law and restrict the independence of the Agency. In this proposal of the previous government all members of the Council would be appointed by the government. After resistance of SQAA and when a new government came to power this proposal was withdrawn. It does show, however, that QA agencies always have to stay alert when it comes to safeguarding their independence.**

Conclusion: fully compliant.

Mednarodna skupina strokovnjakov poročilo EQAR končuje takole:

“The panel was also impressed that SQAA was able to maintain its operative capabilities in spite of management changes and the occurrence of many legal changes which asked for constant adaptations of the QA procedures. However, **the review panel expresses its hope that in the near future legal changes would occur less frequently as it absorbs much energy from all SQAA staff members and has the potential to cause delays in the daily work of the agency.** ... There is no doubt that staff on all levels of SQAA has the qualifications and a high commitment to bring SQAA to a prime position among European quality assurance agencies.”

Poročilo zunanje evalvacije EQAR o SQAA

https://www.eqar.eu/fileadmin/agencyreports/SQAA_External_Review_Report.pdf

Pismo Odbora EQAR o vpisu SQAA

https://www.eqar.eu/fileadmin/agencyreports/2013_05_SQAA_ApprovalDecision.pdf



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VČLANITEV V ENQA:

Na NAKVIS smo se ob upoštevanju predlogov za izboljšanje dela, ki jih je navedla komisija EQAR, pripravili na drugo mednarodno evalvacijo, da bi izpolnil še en strateški cilj države (glej Nacionalni program visokega šolstva iz leta 2009), to je včlanitev v ENQA. Jeseni 2014 je NAKVIS presojala mednarodna skupina strokovnjakov (komisija ENQA) in vnovič ugotavljala, ali še vedno izpolnjujemo ESG, med njimi tudi standard 3.2 (uradni status) in 3.6. (neodvisnost). Ugotovila je, da ju popolnoma izpolnjujemo. Opozarjamo pa na pomembno merilo ENQA, ki **zadeva tudi doslednost pri akreditacijskih odločitvah, pritožbene organe agencije oziroma varovanje pravic visokošolskih zavodov**; v zvezi z njimi je v poročilu ENQA takole zapisano:

»ENQA CRITERION 8: CONSISTENCY OF JUDGEMENTS, APPEALS SYSTEM AND CONTRIBUTIONS TO AIMS OF ENQA

- i. The Agency pays careful attention to its declared principles at all times, and ensures both that its requirements and processes are managed professionally and that its judgements are reached in a consistent manner, even if the judgements are formed by different groups.
- ii. If the Agency makes formal quality assurance decisions, or conclusions which have formal consequences, it should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of the Agency.
- iii. The Agency is willing to contribute actively to the aims of ENQA.

Evidence

The SQAA has shown evidence of professionalism and dedication to quality enhancement of Slovenian higher education in the preceding sections. Measures are taken to ensure consistency in decisions, even though the panel sees room for improvements in developing a shared understanding of the criteria (cf. section 4, ESG 2.3). The SQAA also has a functioning appeals procedure in place.

The SQAA is active in international quality assurance organizations and projects and has participated in several ENQA activities.

Analysis

The panel judges the SQAA to fulfil the requirements for this criterion. The panel sees an agency that will highly contribute to the aims ENQA. As shown in previous sections, the ambition and devotion in developing both external quality assurance processes and the internal quality procedures at institutions is a good example from others to learn from. The extensive dialogue with stakeholders is another good example from the SQAA and an important contribution to the ENQA community.

Conclusion

Standard fulfilment: Fully compliant«

V poročilu ENQA je v sklepnem delu med drugim zapisano:

“Within this rather comprehensive quality assurance framework SQAA is obviously a well-functioning quality assurance agency, conducting its reviews professionally and in substantial compliance with the ESG. The agency is to be commended for a strong developmental component in its reviews which goes beyond of what is known from many other accreditation procedures in the EHEA. The panel appreciated the high level of commitment by staff, management and members of the Council.”



Čeprav je komisija ENQA ugotovila, da NAKVIS popolnoma izpolnjuje standard glede neodvisnosti, je ob včlanitvi v ENQA v začetku leta 2015 njen odbor (ENQA Board) zapisal tole priporočilo:

»As for the independence criterion, the Board notes that, although the panel's judgement is one of full compliance, the Agency Council includes two government representatives. SQAA/NAKVIS is advised to take steps toward achieving better formal independence from the government.«

Poročilo zunanje evalvacije ENQA o SQAA

<http://www.enqa.eu/wp-content/uploads/2015/03/Review-report-of-the-SQAA.pdf>

Pismo Odbora ENQA o vključitvi SQAA

http://www.enqa.eu/wp-content/uploads/2015/03/Letter-ENQA-to-SQAA_180315.pdf

PRIPRAVA NAKVIS NA VNOVIČNO ZUNANJO EVALVACIJO ZA PODALJŠANJE ČLANSTVA V ENQA IN VPISA V EQAR

Na NAKVIS moramo vsakih pet let (v skladu z ESG 3.7) dokazati, da še vedno izpolnjujemo ESG. Prihodnje leto (2018) nas bo vnovič presojala mednarodna skupina strokovnjakov, in sicer po novih ESG iz leta 2015. Naj spomnimo, da je bila podpisnica novih ESG tudi naša vlada, in sicer v Erevanu maja 2015.

»3.7 Cyclical external review of agencies

Standard:

Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

Guidelines:

A periodic external review will help the agency to reflect on its policies and activities. It provides a means for assuring the agency and its stakeholders that it continues to adhere to the principles enshrined in the ESG.«

Prevod standarda:

3.7 Periodične zunanje presoje agencij

Standard: Agencije najmanj vsakih pet let v zunanji presoji dokažejo skladnost svojega delovanja z ESG.

Smernice: Periodična zunanja presoja bo pomagala agenciji razmisliti o svojih politikah in dejavnostih. To je tudi način, da agencija v sodelovanju z deležniki še naprej deluje skladno z načeli ESG.

V novih ESG iz leta 2015 je še natančneje poudarjena neodvisnost agencij:

3.3 Independence

Standard:

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

Guidelines:

Autonomous institutions need independent agencies as counterpart.

In considering the independence of an agency the following are important:

- Organisational independence, demonstrated by official documentation (e.g. instruments of government, legislative acts or statutes of the organisation) that stipulates the independence of the agency's work from third parties, such as higher education institutions, governments and other stakeholder organisations;
- Operational independence: the definition and operation of the agency's procedures and methods as well as the nomination and appointment of external experts are undertaken independently from third parties such as higher education institutions, governments and other stakeholders;
- Independence of formal outcomes: while experts from relevant stakeholder backgrounds, particularly students, take part in quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

Anyone contributing to external quality assurance activities of an agency (e.g. as expert) is informed that while they may be nominated by a third party, they are acting in a personal capacity and not representing their constituent organisations when working for the agency. Independence is important to ensure that any procedures and decisions are solely based on expertise.«

Prevod standarda:

3.3 Neodvisnost

Standard: Agencije delujejo neodvisno in avtonomno. **Imajo polno odgovornost pri svojih odločitvah oziroma presojah, na katere ne vpliva nihče.**

Smernice: Avtonomni zavodi potrebujejo za sogovornika neodvisno agencijo. Pri upoštevanju neodvisnosti agencije je pomembno naslednje:

- **organizacijska neodvisnost** je razvidna iz uradne dokumentacije (npr. iz sklepov vlade, zakonskih aktov ali statuta organizacije), ki določa neodvisnost dela agencije od tretjih oseb, kot so visokošolski zavodi, vlade in druge organizacije deležnikov;
- **neodvisnost delovanja:** opredelitev in izvajanje postopkov, uporabljanje metod na agenciji in 22 imenovanje zunanjih strokovnjakov so oziroma potekajo neodvisno od tretjih oseb, kot so visokošolski zavodi, vlade in drugi deležniki;
- **neodvisnost formalnih odločitev oziroma presoj:** medtem ko strokovnjaki iz vrst pomembnih deležnikov, še posebej študenti, sodelujejo v procesih zagotavljanja kakovosti, končna odločitev oziroma presoja v procesu zagotavljanja kakovosti ostane v pristojnosti agencije.

Vsakdo, ki prispeva k dejavnostim, povezanim z zunanjim zagotavljanjem kakovosti agencije (na primer zunanji strokovnjak), deluje v svojem imenu in ne zastopa organizacije, iz katere je prišel. Neodvisnost je pomembno zagotoviti zato, da vsi procesi in odločitve agencije temeljijo zgolj na strokovnem znanju.

Da bi na NAKVIS izpolnili priporočila ENQA za izboljšanje svojega položaja pred vnovično zunanjo evalvacijo, moramo ENQA sproti poročati o tem; še posebej, ali se spreminja zakonska podlaga,



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ki zadeva neodvisno delovanje agencije. Tako smo ENQA sproti obveščali o zagotovitvi finančne neodvisnosti kot tudi o spremembah, ki jih je prinesel ZViS-K (prehod na institucionalno evalvacijo). Navajamo zadnji letošnji odgovor ENQA:

»Subject: Follow-up report to the 2015 external review report

At its meeting on 4 May 2017, the ENQA Board considered the second follow-up report arising from the external review of SQAA/NAKVIS in 2015. The Board acknowledged the progress made and expressed its satisfaction with the improvements achieved. The Board also takes note of the changes in the Slovenian higher education system that are described in the report.

I also take this opportunity to remind you that as the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015) were adopted in the Ministerial Conference in May 2015, we are expecting that all ENQA Members have now taken the ESG 2015 into use in all relevant procedures.«

Opozarjamo, da bomo morali ENQA in EQAR (v skladu z njunimi pravili) v teh dneh obvestiti tudi o predlogu sprememb ZJA. Zato pozivamo vse pristojne v državi, da iz predloga sprememb ZJA »umaknejo« oziroma črtajo določbe, ki zadevajo NAKVIS. Dobro pa bi bilo, da se razmisli o imenu NAKVIS in se ga spremeni tako, da ne bo več vseboval izraza »agencija«.

Spoštovanje in upoštevanje ESG je pogoj za podaljšanje članstva NAKVIS v ENQA ter vpisa v EQAR. Delovanje v skladu z ESG in polnopravno članstvo v teh zvezah je navsezadnje cilj vseh evropskih, pa tudi drugih držav (vlad) – ta cilj je kakovostno, mednarodno prepoznavno in konkurenčno visoko šolstvo ter enakovredna vključenost v evropski in svetovni visokošolski prostor.

S spoštovanjem.

NAKVIS

Dr. Ivan Leban, direktor

