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|  |  Plan integriteta |  |
|  |  Uprava za vode |  |
|  | 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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| Donošenje nezakonitih odluka |
| Nedozvoljeno lobiranje ili drugi nejavni uticaj |
| Narušavanje integriteta institucije |
| Gubitak povjerenja građana u rad službenika i institucije |
| Neadekvatno strateško planiranje rada institucije |
| Narušavanje principa transparentnosti |
| Sukob interesa |
| Nepostojanje jasne strategije upravljanja, misije i vizije |

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| Zakon o državnim službenicima i namještenicima |
| Zakon o sprječavanju korupcije |
| Interna akta institucije |
| Zakoni i podzakonska akta |

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| Primanje sponzorstava i donacija suprotno odredbama Zakona o sprječavanju korupcijeNepoštovanje zakonske obaveze evidentiranja primljenih sponzorstava i donacija i njihove vrijednostiDonošenje odluka pod eksternim uticajem, suprotno javnom interesuDonošenje odluka pod eksternim uticajem, suprotno javnom interesu zbog nepostojanja jasnih propisa za korišćenje diskrecionih ovlašćenja Neadekvatno sprovođenje nadzora i kontrole nad radom organizacionih jedinica / organa Odstupanja u sprovođenju strategije razvoja institucije, programa i planova rada;Negativna ocjena javnog mnjenja i gubitak povjerenja javnosti u rad institucije zbog nedovoljne transparentnosti i informisanja javnosti o radu institucijeNedovoljno jasna  |

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| Vršiti redovnu kontrolu evidencije o primljenim sponzorstvima i donacijama | direktor | kontinuirano |

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| Puna transparentnost u procedurama odlučivanja u oblastima iz nadležnosti institucije  | direktor | kontinuirano |  |
| službenik za odnose s javnošću |
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|  |  | 10.08.2024. |  |
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| Razmotriti usvajanje procedura o diskrecionom odlučivanju  | direktor | kontinuirano |  |
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|  |  | 10.08.2026. |  |
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| Redovno izvještavanje o sprovedenim kontrolama | direktor | kontinuirano |  |
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|  |  | 10.08.2026. |  |
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| Praćenje realizacije preporuka za unapređenje rada  | direktor | kontinuirano |  |
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| 1.1 | Rukovođenje i upravljanje |

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| Donošenje nezakonitih odluka |
| Nedozvoljeno lobiranje ili drugi nejavni uticaj |
| Narušavanje integriteta institucije |
| Gubitak povjerenja građana u rad službenika i institucije |
| Neadekvatno strateško planiranje rada institucije |
| Narušavanje principa transparentnosti |
| Sukob interesa |
| Nepostojanje jasne strategije upravljanja, misije i vizije |

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| Zakon o državnim službenicima i namještenicima |
| Zakon o sprječavanju korupcije |
| Interna akta institucije |
| Zakoni i podzakonska akta |

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| podjela i razgraničenja sistema kontrole i vršenja ovlašćenja zbog velike koncentracije zadataka na samo jednoj osobi;Neadekvatno kreiranje politike razvoja i upravljanja (utvrđivanje misije, vizije, strategija i planova) |

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| Redovno u toku godine izvještavati o sprovođenju strateških dokumenata, planova i programa | direktor | kontinuirano |

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| Proaktivno objavljivati informacije iz člana 12 Zakona o slobodnom pristupu informacijama i druge informacije od javnog interesa uz odgovarajući način zaštite ličnih podataka koji su od značaja za privatnost i podataka koji su označeni stepenom tajnosti, u skladu sa zakonom | direktor | kontinuirano |  |
| službenik za slobodan pristup informacijama |
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| Omogućiti dostupnost i preglednost relevantnih dokumenata na internet stranici | direktor | kontinuirano |  |
| stručni saradnik |
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| Adekvatno popunjavanje radnih mjesta u organizacionim jedinicama  | direktor | kontinuirano |  |
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| Osigurati učešće svih relevantnih subjekata i jedinica prilikom kreiranja politike razvoja i upravljanja | direktor | kontinuirano |  |
| rukovodilac odjeljenja |
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| Napraviti model za procjenu učinkovitosti i uspješnosti organizacije | direktor | kontinuirano |  |
| rukovodilac odjeljenja |
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| 1.1 | Rukovođenje i upravljanje |

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| Donošenje nezakonitih odluka |
| Nedozvoljeno lobiranje ili drugi nejavni uticaj |
| Narušavanje integriteta institucije |
| Gubitak povjerenja građana u rad službenika i institucije |
| Neadekvatno strateško planiranje rada institucije |
| Narušavanje principa transparentnosti |
| Sukob interesa |
| Nepostojanje jasne strategije upravljanja, misije i vizije |

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| Zakon o državnim službenicima i namještenicima |
| Zakon o sprječavanju korupcije |
| Interna akta institucije |
| Zakoni i podzakonska akta |

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| Primanje sponzorstava i donacija suprotno odredbama Zakona o sprječavanju korupcijeNepoštovanje zakonske obaveze evidentiranja primljenih sponzorstava i donacija i njihove vrijednostiDonošenje odluka pod eksternim uticajem, suprotno javnom interesuDonošenje odluka pod eksternim uticajem, suprotno javnom interesu zbog nepostojanja jasnih propisa za korišćenje diskrecionih ovlašćenja Neadekvatno sprovođenje nadzora i kontrole nad radom organizacionih jedinica / organa Odstupanja u sprovođenju strategije razvoja institucije, programa i planova rada;Negativna ocjena javnog mnjenja i gubitak povjerenja javnosti u rad institucije zbog nedovoljne transparentnosti i informisanja javnosti o radu institucijeNedovoljno jasna podjela i razgraničenja sistema kontrole i vršenja ovlašćenja zbog velike koncentracije zadataka na samo jednoj osobi;Neadekvatno kreiranje politike razvoja i upravljanja (utvrđivanje misije, vizije, strategija i planova) |

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| Razmotriti preporuke relevantnih subjekata koje se odnose na razvoj institucije | direktor | kontiniurano |

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| rukovodilac odjeljenja |
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| Uključenost NVO sektora u radne grupe za izradu propisa I drugih strateških akata  | direktor | kontinuirano |  |
| rukovodilac odjeljenja |
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| Sprovođenje javnih rasprava  | direktor | kontinuirano |  |
| rukovodilac odjeljenja |
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| Povećati broj stručnih saradnika | direktor | kontinuirano |  |
| rukovodilac odjeljenja |
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| 2.1 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |
| svi zaposleni |

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| Primanje nedozvoljenih poklona ili druge nedozvoljene koristi |
| Zloupotreba  |

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| Zakon o državnim službenicima i namještenicima |
| Zakon o sprječavanju korupcije |

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| Primanje poklona suprotno odredbama Zakona o sprječavanju korupcijeNepoštovanje zakonske obaveze evidentiranja  |

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| Odrediti lice koje je zaduženo za evidenciju poklona javnih funkcionera | direktor | kontinuirano |

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| svi zaposleni |
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| 2.1 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |
| svi zaposleni |

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| službenih podataka i informacija |
| Narušavanje principa transparentnosti |
| Nedozvoljeno lobiranje ili drugi nejavni uticaj |
| Neprijavljivanje korupcije i drugih nezakonitih radnji |
| Ugrožavanje zaštite podataka |
| Neefikasna i neracionalna kadrovska politika |
| Ugrožavanje službenog lica kod otkrivanja i prijavljivanja sumnje na korupciju i druge povrede integriteta |
| Zloupotreba rada u državnom organu i korišćenja imovine  |

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| Zakoni i podzakonska akta |
| Zakon o tajnosti podataka |
| Zakon o zaštiti diskriminacije na radnom mjestu |

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| primljenih poklona i njihove vrijednostiNedovoljna informisanost zaposlenih o obavezi prijavljivanja poklonaNedostavljanje Agenciji za sprječavanje korupcije izvoda iz evidencije poklona Neblagovremeno i nepotpuno dostavljanje izvještaja o imovini i prihodima javnih funkcionera Odluka o varijabilnom dijelu zarade i drugih odluka od značaja za rad edukaciju, usavršavanje i materijalni status zaposlenihNedovoljan razvijen nivo svijesti zaposlenih za prijavljivanje korupcije i drugih nezakonitih radnji unutar institucijeNedovoljni kadrovski kapaciteti u određenim organizacionim jedinicamaNedostatak stručnog znanja i vještina kadraNe postoje jasni kriterijumi za objektivnu ocjenu rada i nagrađivanja službenika  |

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| Vršiti redovnu kontrolu evidencije o primljenim poklonima | direktor | kontinuirano |  |
| svi zaposleni |
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|  |  | 31.12.2025. |  |
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| Dostaviti Agenciji za sprječavanje korupcije izvod iz evidencije poklona na propisanom obrascu, ukoliko je evidentirano primanje poklona  | direktor | kontinuirano |  |
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|  |  | 31.12.2025. |  |
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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 |  |
| svi zaposleni |
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|  |  | 31.12.2025. |  |
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| Donijeti interno uputstvo o vođenju evidencije | direktor | kontinuirano |  |
| stručna služba |
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|  |  | 31.12.2025. |  |
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| Edukacija zaposlenih o mehanizmima prijavljivanja korupcije i drugih nezakonitih radnji unutar institucije  | direktor | kontinuirano |  |
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| 2.1 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |
| svi zaposleni |

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| Primanje nedozvoljenih poklona ili druge nedozvoljene koristi |
| Zloupotreba službenih podataka i informacija |
| Narušavanje principa transparentnosti |
| Nedozvoljeno lobiranje ili drugi nejavni uticaj |
| Neprijavljivanje korupcije i drugih nezakonitih radnji |
| Ugrožavanje zaštite podataka |
| Neefikasna i neracionalna kadrovska politika |
| Ugrožavanje službenog lica kod otkrivanja i prijavljivanja sumnje na korupciju i druge povrede integriteta |
| Zloupotreba rada u državnom organu i korišćenja imovine  |

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| Zakon o državnim službenicima i namještenicima |
| Zakon o sprječavanju korupcije |
| Zakoni i podzakonska akta |
| Zakon o tajnosti podataka |
| Zakon o zaštiti diskriminacije na radnom mjestu |

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| Primanje poklona suprotno odredbama Zakona o sprječavanju korupcijeNepoštovanje zakonske obaveze evidentiranja primljenih poklona i njihove vrijednostiNedovoljna informisanost zaposlenih o obavezi prijavljivanja poklonaNedostavljanje Agenciji za sprječavanje korupcije izvoda iz evidencije poklona Neblagovremeno i nepotpuno dostavljanje izvještaja o imovini i prihodima javnih funkcionera Odluka o varijabilnom dijelu zarade i drugih odluka od značaja za rad edukaciju, usavršavanje i materijalni status zaposlenihNedovoljan razvijen nivo svijesti zaposlenih za prijavljivanje korupcije i drugih nezakonitih radnji unutar institucijeNedovoljni kadrovski kapaciteti u određenim organizacionim jedinicamaNedostatak stručnog znanja i vještina kadraNe postoje jasni kriterijumi za objektivnu ocjenu rada i nagrađivanja službenika  |

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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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| Izvršiti procjenu potrebnog kadra za efikasno sprovođenje poslova iz nadležnosti institucije | direktor | kontinuirano |  |
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| Popuniti upražnjena radna mjesta u skladu sa Pravilnikom o sistematizaciji i organizaciji radnih mjesta | direktor | kontinuirano |  |
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| Obezbijediti redovno sprovođenje plana i programa stručnog usavršavanja | direktor | kontinuirano |  |
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| Sprovoditi obuke zaposlenih o etici i integritetu | direktor | kontinuirano |  |
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| Povećanje transparentnosti prilikom ocjenjivanja i nagrađivanja službenika na način što će se  | direktor | kontinuirano |  |
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| 2.1 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| direktor |
| svi zaposleni |

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| Primanje nedozvoljenih poklona ili druge nedozvoljene koristi |
| Zloupotreba službenih podataka i informacija |
| Narušavanje principa transparentnosti |
| Nedozvoljeno lobiranje ili drugi nejavni uticaj |
| Neprijavljivanje korupcije i drugih nezakonitih radnji |
| Ugrožavanje zaštite podataka |
| Neefikasna i neracionalna kadrovska politika |
| Ugrožavanje službenog lica kod otkrivanja i prijavljivanja sumnje na korupciju i druge povrede integriteta |
| Zloupotreba rada u državnom organu i korišćenja imovine  |

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| Zakon o državnim službenicima i namještenicima |
| Zakon o sprječavanju korupcije |
| Zakoni i podzakonska akta |
| Zakon o tajnosti podataka |
| Zakon o zaštiti diskriminacije na radnom mjestu |

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| Primanje poklona suprotno odredbama Zakona o sprječavanju korupcijeNepoštovanje zakonske obaveze evidentiranja primljenih poklona i njihove vrijednostiNedovoljna informisanost zaposlenih o obavezi prijavljivanja poklonaNedostavljanje Agenciji za sprječavanje korupcije izvoda iz evidencije poklona Neblagovremeno i nepotpuno dostavljanje izvještaja o imovini i prihodima javnih funkcionera Odluka o varijabilnom dijelu zarade i drugih odluka od značaja za rad edukaciju, usavršavanje i materijalni status zaposlenihNedovoljan razvijen nivo svijesti zaposlenih za prijavljivanje korupcije i drugih nezakonitih radnji unutar institucijeNedovoljni kadrovski kapaciteti u određenim organizacionim jedinicamaNedostatak stručnog znanja i vještina kadraNe postoje jasni kriterijumi za objektivnu ocjenu rada i nagrađivanja službenika  |

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| rezultati ocjenjivanja i spisak nagrađenih službenika javno objavljivati na oglasnoj tabli  |  |  |

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| Redovno dostavljati izvještaje o imovini i prihodima javnih funkcionera | javni funkcioneri (imenovani i zaposleni u instituciji) | kontinuirano |  |
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| svi zaposleni |  |
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| Objavljivanje svih odluka od značaja za rad, edukaciju, usavršavanje i materijalni status zaposlenih na oglasnoj tabli institucije zbog povećanja transparentnosti | direktor | kontinuirano |  |
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| 3.1 | Planiranje i upravljanje finansijama |

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| pomoćnik direktora |
| direktor |
| službenik za javne nabavke |

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| Neadekvatno planiranje i izvršavanje budžeta |
| Neadekvatno sprovođenje postupaka javnih nabavki |
| Neadekvatno planiranje i izvršavanje godišnjeg Programa upotrebe sredstava za upravljanje vodnim  |

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| Zakon o budžetu |
| Zakon o javnim nabavkama |
| Obuke i seminari |

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| Neadekvatno planiranje godišnjeg Programa upotrebe sredstava za upravljanje vodnim resursimaOdstupanje od realizacije aktivnosti predviđenih ugovorima o javnoj nabavciNeadekvatno i nedovoljno transparentno trošenje budžetskih sredstava |

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| Smjernice ministarstva finansija  | rukovodilac finansijske službe | kontinuirano |

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| Pohađati relevantne obuke i seminare na temu planiranja budžeta | direktor | kontinuirano |  |
| rukovodilac finansijsko računovodstvenih poslova |
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| 3.1 | Planiranje i upravljanje finansijama |

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| resursima |
| Kašnjenje donošenja plana javnih nabavki od strane institucije i dužina trajanja postupka javnih nabavki i ugovaranje u svrhu realizacije mjera iz programa |
| Iskorišćavanje javne funkcije ili službenog položaja |

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| Zakon o budžetu |
| Zakon o javnim nabavkama |
| Obuke i seminari |

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| Neadekvatno planiranje godišnjeg Programa upotrebe sredstava za upravljanje vodnim resursimaOdstupanje od realizacije aktivnosti predviđenih ugovorima o javnoj nabavciNeadekvatno i nedovoljno transparentno trošenje budžetskih sredstava |

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| Međusektorska saradnja  | direktor | kontinuirano |

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| službenik za javne nabavke |
| rukovodilac finansijske službe |
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|  |  |  |  |
| Unijeti antikorupcijsku klauzulu u sve ugovore o javnim nabavkama  | direktor | kontinuirano |  |
| rukovodilac finansijske službe |
| rukovodilac službe opštih poslova |
| službenik za javne nabavke |
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| Obavezno uključivanje po jednog eksperta iz oblasti na koju se odnosi konkretna javna nabavka u sastav komisije | direktor | kontinuirano |  |
| službenik za javne nabavke |
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| Redovno sprovođenje unutrašnjih finansijskih kontrola | direktor | kontinuirano |  |
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|  |  | 31.12.2025. |  |
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| Zapošljavanje potrebnih revizora u jedinici za unutrašnju reviziju | direktor | kontinuirano |  |
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| Postupati po preporukama iz izvještaja o izvršenoj reviziji | direktor | kontinuirano |  |
| rukovodilac finansijske službe |
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| 4.1 | Čuvanje i bezbjednost podataka i dokumenata |

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| samostalni referent |
| rukovodilac sektora |
| svi zaposleni |

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

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| Edukacija |
| Interna akta institucije |
| Podzakonska akta |

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

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| Vršiti redovne kontrole nad prijemom i razvrstavanjem dokumentacije u cilju sprečavanja gubljenja, oštećenja ili neevidentiranja dokumentacije | direktor | kontinuirano |

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|  Obezbijediti uslove za fizičko obezbjeđenje imovine  | direktor | kontinuirano |  |
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| Obezbijediti zaštitu i čuvanje tajnih podataka i podataka o ličnosti u skladu sa zakonom  | direktor | kontinuirano |  |
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| 5.1 | Obračun vodnih naknada  |

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| samostalni savjetnik |

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| Kašnjenje u obračunu vodnih naknada, naknada za korišćenje voda, zastitu voda od zagađivanja i naknada za izvađeni materijal iz vodotoka  |

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| Zakon o vodama |
| Zakon o finansiranju upravljanja vodama  |
| Odluka o načinu obračunavanja vodnih naknada i kriterijumima i načinu utvrđivanja stepena zagađenosti voda  |
| Zakon o koncesijama |

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|  Otežano prikupljanje podataka i godišnjih izvještaja obveznika vodnih naknada o količinama zahvaćene i ispuštne otpadne vode, korišćenje voda za piće i komunalne potrebe, pogonske i tehnološke potrebe, navodnjavanje, flaširanjem odnosno pakovanje prirodnih voda, za odvajanje i dopremanje voda u komercijalne svrhe, za proizvodnju električne energije, rafting i splavarenje. -Dostavaljanje nepotpunih ili pogrešnih informacija-Odlazak pod stečaj velikih obveznika vodnih naknada  |

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| Praćenje prihoda | direktor | kontinuirano |

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| 6.1 | Obračun koncesionih naknada  |

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| samostalni savjetnik |

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| Kašnjenje sa obračunom koncesionih naknada |

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| Zakon o koncesijama |
| Zakon o finansiranju upravljanja vodama  |

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| -Odlazak pod stečaj velikih koncesionara-Raskid ugovora-Neispunjavanje koncesionih obaveza-Dostavaljanje  |

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| 6.1 | Obračun koncesionih naknada  |

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| samostalni savjetnik |

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| Kašnjenje sa obračunom koncesionih naknada |

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| Odluka o načinu obračunavanja vodnih naknada i kriterijumima i načinu utvrđivanja stepena zagađenosti voda  |

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| nepotpunih ili pogrešnih informacija-Nedostavljanje godišnjih izvještaja |

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| Kontrola od strane Revizorskog tijela  | direktor | kontinuirano |

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| Saradnja sa Poreskom Upravom | direktor | kontinuirano |  |
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| Saradnja sa Upravom za inspekcijske poslove | direktor | kontinuirano |  |
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| 7.1 | Izdavanje vodnih akata |

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| samostalni savjetnik |

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| Neizdavanje vodnih akata u skladu sa dinamikom izdavanja vodnih akata,vodnih dozvola, vodnih saglasnosti i vodnih uslova i stručnih misljenja  |

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| Zakon o vodama |

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| Nedostatak stručnog kadra  |

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| Zapošljavanje u skladu da Pravilnikom o unutrašnjoj sistematizaciji i organizaciji radnih mjesta Uprave za vode  | direktor | kontinuirano |

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| Saradnja sa Direktoratom za vodoprivredu  | direktor | kontinuirano |  |
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| 8.1 | Odnosi sa javnošću |

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| direktor |
| službenik za odnose s javnošću |

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

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| Nedovoljna informisanost javnosti o radu institucijeNedovoljna i nekoordinisana saradnja između nadleznog ministarstva  |

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| Povećati broj informacija o radu institucije po sopstvenoj inicijativi i na zahtjev medija i javnosti | direktor | kontinuirano |

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| Unaprijediti kvalitet i kvantitet informacija na web stranici institucije | direktor | kontinuirano |  |
| rukovodilac IT službe |
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| 8.1 | Odnosi sa javnošću |

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| direktor |
| službenik za odnose s javnošću |

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

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| Nedovoljna informisanost javnosti o radu institucijeNedovoljna i nekoordinisana saradnja između nadleznog ministarstva  |

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| Redovno i blagovremeno dostavljati informacije nadležnom ministarstvu  | direktor |  |

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| rukovodilac odjeljenja |  |
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| Unaprijed pripremljen predlog odgovora u odnosu na moguća pitanja koja su od javnog interesa ili izazivaju posebno interesovanje medija i javnosti | direktor | kontinuirano |  |
| rukovodilac odjeljenja |
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| 9.1 | Slobodan pristup informacijama |

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| samostalni savjetnik |
| službenik za slobodan pristup informacijama |

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

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| Zakon o slobodnom pristupu informacijama |

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| Kašnjenje u donošenju rješenja u zakonski propisanom roku  |

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| Izvršiti procjenu potrebnog kadra za efikasno sprovođenje poslova iz nadležnosti institucije | službenik za slobodan pristup informacijama | kontinuirano |

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| samostalni savjetnik |
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| Popuniti upražnjena radna mjesta u skladu sa Pravilnikom o sistematizaciji i organizaciji radnih mjesta | direktor | kontinuirano |  |
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