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|  |  Plan integriteta |  |
|  |  Ministarstvo poljoprivrede, šumarstva i vodoprivrede |  |
|  | 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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| Ministar |
| Državni sekretar ministarstva |
| državni sekretar za oblast šumarstva, lovstva i drvne industrije |
| Generalni direktori u ministarstvu |
| Načelnici i rukovodioci odjeljenja |
| starješine organa u sastavu |

 |

|  |
| --- |
| Donošenje nezakonitih odluka |
| neadekvatno kreiranje politike razvoja i upravljanja |
| Narušavanje integriteta institucije |
| Nedozvoljeno lobiranje ili drugi nejavni uticaj |

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| --- |
| Zakoni i podzakonska akta |
| Zaključci Vlade |
| Podjela radnih zadataka |
| Uvid u kompletnu dokumentaciju |
| Mogućnost ulaganja žalbi |
| Etički kodeks |

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| --- |
| Donošenje odluka pod eksternim uticajem, suprotno javnom interesu zbog nepostojanja jasnih propisa za korišćenje diskrecionih ovlašćenjaNeblagovremeno i nepotpuno dostavljanje izvještaja o imovini i prihodima javnih funkcioneraVelika koncentracija poslova i ovlašćenja, pa samim tim i nedovoljno jasna podjela i razgraničenje sistema kontroleNegativna ocjena javnog mnjenja i gubitak povjerenja u rad institucije zbog nedovoljne transparentnosti i informisanja javnosti o radu institucije |

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| Puna transparentnost u procedurama odlučivanja u oblastima iz nadležnosti , popunjavanje radnih mjesta u skladu sa odobrenim budžetom | Ministar | kontinuirano |

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| Donošenje strategije razvoja institucije u četvorogodišnjem periodu uz mjerenje ispunjenosti godišnjeg plana realizacije strategije | Ministar | kontinuirano |  |
| Državni sekretar ministarstva |
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| Redovno dostavljati izvještaje o imovini i prihodima javnih funkcionera ASK-u | ministar | kontinuirano |  |
| Državni sekretar ministarstva |
| Generalni direktori u ministarstvu |
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| Razmotriti mogućnost povećanja broja izvršilaca u direktoratima, kroz eventualne izmjene Pravilnika o unutrašnjoj sistematizaciji ministarstva | Ministar | kontinuirano |  |
| Državni sekretar ministarstva |
| Generalni direktori u ministarstvu |
| načelnici |
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| 1.1 | Rukovođenje i upravljanje |

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| Ministar |
| Državni sekretar ministarstva |
| državni sekretar za oblast šumarstva, lovstva i drvne industrije |
| Generalni direktori u ministarstvu |
| Načelnici i rukovodioci odjeljenja |
| starješine organa u sastavu |

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| Donošenje nezakonitih odluka |
| neadekvatno kreiranje politike razvoja i upravljanja |
| Narušavanje integriteta institucije |
| Nedozvoljeno lobiranje ili drugi nejavni uticaj |

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| --- |
| Zakoni i podzakonska akta |
| Zaključci Vlade |
| Podjela radnih zadataka |
| Uvid u kompletnu dokumentaciju |
| Mogućnost ulaganja žalbi |
| Etički kodeks |

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| Donošenje odluka pod eksternim uticajem, suprotno javnom interesu zbog nepostojanja jasnih propisa za korišćenje diskrecionih ovlašćenjaNeblagovremeno i nepotpuno dostavljanje izvještaja o imovini i prihodima javnih funkcioneraVelika koncentracija poslova i ovlašćenja, pa samim tim i nedovoljno jasna podjela i razgraničenje sistema kontroleNegativna ocjena javnog mnjenja i gubitak povjerenja u rad institucije zbog nedovoljne transparentnosti i informisanja javnosti o radu institucije |

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|  | Starješine organa u sastavu |  |

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| Uključenost NVO sektora u radne grupe za izradu propisa i drugih strateških akata | Generalni direktori u ministarstvu | kontinuirano |  |
| načelnici |
| Starješine organa u sastavu |
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| 2.1 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| --- |
| Generalni direktori u ministarstvu |
| starješine organa u sastavu |
| Načelnik Službe za opšte poslove |
| Svi zaposleni |

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| --- |
| Donošenje nezakonitih odluka |
| Nesavjesno i neodgovorno obavljanje poslova |
| Nestručno, neetično i neprofesionalno ponašanje zaposlenih |
| Primanje nedozvoljenih poklona ili druge nedozvoljene koristi |

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| --- |
| Zakoni i podzakonska akta |
| Interna akta institucije |
| Etički kodeks |
| Donošenje godišnjeg kadrovskog plana |
| Obaveza sastavljanja izvještaja |
| Edukacija |

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| Nesprovođenje zakonske obaveze evidentiranja primljenih sponzostava i donacija i njihove vrijednosti i nedostavljanje Agenciji za sprječavanje korupcije pisanog izvještaja o primljenim sponzorstvima i donacijamaNedovoljno razvijen nivo svijesti za prijavljivanje korupcije i drugih nezakonitih radnjiMogućnost nastanka sukoba interesa prilikom donošenja odluka i sprovođenja zakonskih procedura |

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| Vršiti redovnu kontrolu evidencije o primljenim sponzorstvima i donacijama i dostaviti ASK-u do kraja marta tekuće godine za prethodnu godinu pisani izvještaj o primljenim sponzorstvima i donacijama sa kopijom dokumentacije u vezi sa tim sponzorstvima ili donacijama, na propisanom obrascu. | Generalni direktori u ministarstvu |  |

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| Starješine organa u sastavu |
| Načelnik Službe za opšte poslove |
| Svi zaposleni |
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|  |  | 31.12.2021. |  |
|  |  |  |  |
| Voditi evidenciju o zahtjevima za izuzeće zbog sukoba interesa | Načelnik Službe za opšte poslove |  |  |
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|  |  | 31.12.2021. |  |
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| Povećati broj službenika ministarstva i organa u sastavu na obukama iz oblasti borbe protiv korupcije | Generalni direktori u ministarstvu |  |  |
| Starješine organa u sastavu |
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| 2.1 | Kadrovska politika, etično i profesionalno ponašanje zaposlenih |

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| Generalni direktori u ministarstvu |
| starješine organa u sastavu |
| Načelnik Službe za opšte poslove |
| Svi zaposleni |

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| --- |
| Donošenje nezakonitih odluka |
| Nesavjesno i neodgovorno obavljanje poslova |
| Nestručno, neetično i neprofesionalno ponašanje zaposlenih |
| Primanje nedozvoljenih poklona ili druge nedozvoljene koristi |

 |

|  |
| --- |
| Zakoni i podzakonska akta |
| Interna akta institucije |
| Etički kodeks |
| Donošenje godišnjeg kadrovskog plana |
| Obaveza sastavljanja izvještaja |
| Edukacija |

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| --- |
| Nesprovođenje zakonske obaveze evidentiranja primljenih sponzostava i donacija i njihove vrijednosti i nedostavljanje Agenciji za sprječavanje korupcije pisanog izvještaja o primljenim sponzorstvima i donacijamaNedovoljno razvijen nivo svijesti za prijavljivanje korupcije i drugih nezakonitih radnjiMogućnost nastanka sukoba interesa prilikom donošenja odluka i sprovođenja zakonskih procedura |

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|  | Načelnik Službe za opšte poslove |  |

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|  | Svi zaposleni |  |  |
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| 3.1 | Planiranje i upravljanje finansijama |

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| --- |
| generalni direktor |
| starješine organa u sastavu |
| Načelnik Odjeljenja za opšte poslove |
| Načelnik Odjeljenja za finansije, računovodstvo i javne nabavke |
| Članovi komisije za otvaranje i vrednovanje ponuda |
| Službenik za javne nabavke |

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| Neadekvatno strateško planiranje rada institucije |
| Zloupotreba službenog položaja |
| Kršenje principa transparentnosti |

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| Zakoni i podzakonska akta |
| Etički kodeks |
| Mogućnost ulaganja žalbi |
| Obaveza sastavljanja polugodišnjih i godišnjih izvještaja Upravi za javne nabavke |

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| Nedovoljna transparentnost trošenja sredstava i zapošljavanja u toku izborne godineMogućnost sukoba interesa zaposlenih koji učestvuju u postupku javnih nabavkiDavanje prednosti određenoj firmi u procesu javnih nabavki, na način da se tehnička specifikacija prilagođava određenoj firmi |

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| Redovno u toku izborne kampanje objavljivati i dostavljati ASK-u sve dokumente shodno Zakonu o finansiranju političkih subjekata i izbornih kampanja (analitičke kartice, putne naloge i odluke o zapošljavanju sa pratećom dokumentacijom) | Generalni direktori u ministarstvu | kontinuirano |

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| Starješine organa u sastavu |
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| Osigurati učešće svih relevantnih subjekata i jedinica prilikom planiranja budžeta | Generalni direktori u ministarstvu | kontinuirano |  |
| Starješine organa u sastavu |
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| Pohađati relevantne obuke i seminare na temu planiranja budžeta | Načelnik Odjeljenja za opšte poslove | kontinuirano |  |
| Načelnik Odjeljenja za finansije, računovodstvo i javne nabavke |
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| 3.1 | Planiranje i upravljanje finansijama |

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| generalni direktor |
| starješine organa u sastavu |
| Načelnik Odjeljenja za opšte poslove |
| Načelnik Odjeljenja za finansije, računovodstvo i javne nabavke |
| Članovi komisije za otvaranje i vrednovanje ponuda |
| Službenik za javne nabavke |

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|  |
| --- |
| Neadekvatno strateško planiranje rada institucije |
| Zloupotreba službenog položaja |
| Kršenje principa transparentnosti |

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| Zakoni i podzakonska akta |
| Etički kodeks |
| Mogućnost ulaganja žalbi |
| Obaveza sastavljanja polugodišnjih i godišnjih izvještaja Upravi za javne nabavke |

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| Nedovoljna transparentnost trošenja sredstava i zapošljavanja u toku izborne godineMogućnost sukoba interesa zaposlenih koji učestvuju u postupku javnih nabavkiDavanje prednosti određenoj firmi u procesu javnih nabavki, na način da se tehnička specifikacija prilagođava određenoj firmi |

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| Obavezno uključivanje po jednog eksperta iz oblasti na koju se odnosi konkretna javna nabavka, u cilju izrade tehničke specifikacije koja ne smije sadržati diskriminatorske kriterijume | Načelnik Odjeljenja za finansije, računovodstvo i javne nabavke | kontinuirano |

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| Službenik za javne nabavke |
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| 4.1 | Čuvanje i bezbjednost podataka i dokumenata |

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| državni sekretar |
| generalni direktor |
| starješine organa u sastavu |
| Načelnik Odjeljenja za opšte poslove |
| Svi zaposleni |

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| Iskorišćavanje javne funkcije ili službenog položaja |
| Ugrožavanje zaštite podataka |
| Curenje informacija |

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| Zakoni i podzakonska akta |
| Interna akta institucije |
| Pojačan službeni i stručni nadzor |

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| Nedovoljna IT bezbjednost podataka kao i njihovo korišćenje u privatne svrheNeadekvatno postupanje sa službenom dokumentacijom i informacijama zbog nedovoljnih mjera fizičke bezbjednosti i tehničke sigurnosti |

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| Obezbijediti kontinuirani stručni nadzor nad podacima | Državni sekretar ministarstva | kontinuirano |

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| Redovna kontrola od strane upravne inspekcije i sprovođenje preporuka | Generalni direktori u ministarstvu | kontinuirano |  |
| Starješine organa u sastavu |
| Načelnik Službe za opšte poslove |
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| Svi zaposleni |  |
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| 5.1 | Dostavljanje prijedloga zakona i drugih akata Vladi |

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| Samostalni i viši savjetnici u svim sektorima |

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| Povrede profesionalnih, etičkih pravila i pristrasno ponašanje |
| Nedozvoljeno lobiranje ili drugi nejavni uticaj |

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| Zakoni i podzakonska akta |
| Edukacija |
| Podjela radnih zadataka |
| Verifikacija od strane kolega |
| Pojačan službeni i stručni nadzor |

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| Nedostatak procedura o radu (nepostojanje smjernica, pravilnika, uputstava)Teško razumljivi i nedorečeni propisi |

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| Donijeti interno uputstvo o kontroli i dostavljanju predloga zakona i drugih akata Vladi | generalni direktor |  |

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| 6.1 | Odnosi sa javnošću |

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| PR služba |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |
| 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 ministarstva i organa u sastavuNedovoljna i nekoordinisana saradnja između različitih organizaconih jedinica |

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| Povećati broj informacija o radu institucije po sopstvenoj inicijativi i na zahtjev medija i javnosti | PR službenici u saradnji sa Državnim sekretarom i generalnim direktorima | kontinuirano |

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| Unaprijediti kvalitet i kvantitet informacija na web stranici institucije | PR službenici u saradnji sa Državnim  | kontinuirano |  |
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| 6.1 | Odnosi sa javnošću |

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| PR služba |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |
| 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 ministarstva i organa u sastavuNedovoljna i nekoordinisana saradnja između različitih organizaconih jedinica |

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|  | sekretarom i generalnim direktorima |  |

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| Redovno i blagovremeno dostavljati informacije PR službi | PR službenici u saradnji sa Državnim sekretarom i generalnim direktorima | kontinuirano |  |
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| Sprovoditi ispitivanja javnog mnjenja o radu institucije | PR službenici u saradnji sa Državnim sekretarom i generalnim direktorima | kontinuirano |  |
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| 7.1 | Slobodan pristup informacijama |

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| Službenik zadužen za slobodan pristup informacijama |

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| Nedozvoljeno lobiranje ili drugi nejavni uticaj |

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

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| Neobjavljivanje dokumenata shodno Zakonu o slobodnom pristupu informacijama, kao i ostalih informacija od značaja za građaneNeosnovano uskraćivanje podnosiocu zahtjeva pristup informaciji Neobavještavanje podnosioca zahtjeva o rješavanju zahtjeva |

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

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| Redovno objavljivati i ažurirati propise koji regulišu rad ustanove na internet stranici, u skladu sa članom 12 ZSPI | Službenik zadužen za slobodan pristup informacijama | kontinuirano |  |
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| Izvještavati o broju podnijetih i riješenih zahtjeva | Službenik zadužen za slobodan pristup informacijama | kontinuirano |  |
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| 8.1 | Nadzor nad poslovima uprava i agencija u sastavu  |
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| Generalni direktori i ovlašćeno lice za vođenje upravnog postupka |

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| Kršenje principa transparentnosti |

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| Zakoni i podzakonska akta |
| Obaveza sastavljanja izvještaja |

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| Neadekvatno planiranje kontrola |

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| Pripremiti plan sprovođenja upravnih kontrola | Generalni direktori i ovlašćeno lice za vođenje upravnog  |  |

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|  | ministarstva |

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| Gubitak povjerenja građana u rad institucija |

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| Kršenje principa transparentnosti |

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| Podjela radnih zadataka |
| Pojačan službeni i stručni nadzor |

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| Neadekvatno planiranje kontrola |

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| Izvještavanje o sprovedenim kontrolama po službenoj dužnosti i po podnešenim predstavkama | Generalni direktori i ovlašćeno lice za vođenje upravnog postupka |  |  |
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