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Od 1. januara 2026 počinje primena Zakona o razmeni podataka, dokumenata i obaveštenja u slučaju nastupanja privremene sprečenosti za rad ("Sl. glasnik RS", br. 109/2025).

Postupak ostvarivanja prava po osnovu privremene sprečenosti za rad se u potpunosti digitalizuje i uvodi se funkcionisanje aplikacije „e-Bolovanje – Poslodavac“, preko koga će poslodavci ubuduće elektronskim putem primiti:

- potvrde o privremenoj sprečenosti za rad, u formi elektronskog dokumenta koji ima dokaznu snagu javne isprave;
- izveštaje o privremenoj sprečenosti za rad koji ujedno ima karakter računovodstvene isprave;

Svi poslodavci dužni su da se najkasnije do 1. januara 2026. godine registruju i pristupe sistemu, kako bi mogli da primaju i obrađuju dokumentaciju na propisan način.

Poslodavac će putem ove aplikacije obavljati sledeće radnje:

- prijem potvrda i izveštaja o privremenoj sprečenosti za rad; prijem obaveštenja o ocenama prvostepene i drugostepene lekarske komisije;
- podnošenje zahteva za obračun naknade zarade za vreme privremene sprečenosti i prijem obračuna od nadležnog organa (od 1 aprila 2026 godine);
- podnošenje prigovora i zahteva, prijem obaveštenja o oceni prvostepene i drugostepene lekarske komisije (od 1 aprila 2026 godine);

Automatskim obaveštavanjem se ukidaju i dosadašnje obaveze zaposlenih iz čl 103 Zakona o radu kao i čl 152

As of 1 January 2026, the Law on the Exchange of Data, Documents and Notifications in Cases of Temporary Incapacity for Work (Official Gazette of the Republic of Serbia, No. 109/2025) shall enter into force.

The procedure for exercising rights arising from temporary incapacity for work shall be fully digitalized, and the application “e-Sick Leave – Employer” shall be introduced. Through this system, employers shall henceforth electronically receive:

- certificates of temporary incapacity for work, in the form of an electronic document having the evidentiary value of a public document;
- reports on temporary incapacity for work, which at the same time constitute accounting documents.

All employers are required to register with and access the system no later than 1 January 2026, in order to receive and process documentation in the prescribed manner.

Through this application, the employer shall perform the following actions:

- receipt of certificates and reports on temporary incapacity for work; receipt of notifications on the assessments of the first-instance and second-instance medical commissions;
- submission of requests for calculation of salary compensation during temporary incapacity for work and receipt of calculations from the competent authority (as of 1 April 2026);
- submission of objections and requests, and receipt of notifications on the assessments of the first-instance and second-instance medical commissions (as of 1 April 2026).

By introducing automatic notifications, the existing obligations of employees prescribed under Article 103 of the Labour Law, as well as Article 152 paragraph 5

st 5 i 154 st 6 Zakona o zdravstvenom osiguranju koje
prstaje da se primenjuju.

and Article 154 paragraph 6 of the Health Insurance
Law, shall be abolished and shall cease to apply.

U slučaju nepoštovanje obaveze pristupanja i
korišćenja sistema propisane su novčane kazne:

In the event of non-compliance with the obligation to
access and use the system, the following monetary
fines are prescribed:

- za poslodavce – pravna lica: 50.000 do 200.000 RSD,
- za preduzetnike: 10.000 do 50.000 RSD,
- za odgovorna lica: 5.000 do 25.000 RSD.

- for employers – legal entities: RSD 50,000 to 200,000;
- for entrepreneurs: RSD 10,000 to 50,000;
- for responsible persons: RSD 5,000 to 25,000.

Za sve dodatne informacije ili konsultacije, tim
Mladenović & associates stoji Vam na raspolaganju.

For any additional information or consultations, the
team of Mladenović & associates remains at your
disposal.