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Laura Papasodaro
Consultant at Modulaw

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ClearCheck: a UN-wide blacklist without a UN-wide policy

Introduction

What is ClearCheck?

According to the Factsheet on ClearCheck,[1] ClearCheck is a centralized, secure database that allows UN entities to share information, system-wide, on individuals with a record of serious misconduct that warranted — or would have warranted — the end of their working relationship with a UN organization. The UN Secretariat is its "*business owner,*" and it is currently used by 43 UN entities, covering everything from a rehire check within one agency to a screen across the entire UN common system.

The tool has grown considerably since it was launched. ClearCheck 1.0, operational since 28 June 2018, covered only Sexual Exploitation and Abuse (**SEA**) and Sexual Harassment (**SH**). ClearCheck 2.0, operational since 1 March 2025, expanded the database to two further categories: Racism/Racial Discrimination (**R/RD**) and "*Other Misconduct*" (**OM**), a category broad enough to capture virtually any substantiated finding of serious wrongdoing. As of August 2026, the database contains 1,228 active subjects.

How it operates in practice

ClearCheck runs as one of two parallel vetting checks whenever a UN entity identifies a hiring candidate (the other being the Case Management Tracking System, which checks for prior misconduct records within the UN Secretariat alone).[2] ClearCheck's reach is much wider: it scans the records of all 43 participating UN entities at once. Since 2018, 784,177 screening requests were made, and 26 matches were ultimately confirmed.

Entry into ClearCheck bears consequences beyond the entity that made the original finding. Because the check spans the entire participating community, a determination made by one agency can, in effect, close the door to employment across the UN system as

[1] As of 1 August 2026, available here.
[2] Further info on the UN vetting system is available here.

a whole: not only with the entity that investigated the person, but at all 43 others that use the tool to screen candidates. De facto, this is a UN-wide ban.

A policy gap

For a tool with these consequences, there is a striking absence of a single public policy document that establishes ClearCheck 2.0, defines its categories with precision, and sets out the criteria and safeguards for entry. The materials available are, at best, partial:

- The 2019 Standard Operating Procedure (**SOP**) covers only the original SEA/SH scope and predates the 2025 expansion by several years. The factsheet itself acknowledges that "*there is not one universal SOP for all*" participating entities, and that each is merely "*encouraged*" to issue its own.
- The 2026 factsheet is a summary document. It states that ClearCheck 2.0's expanded scope follows "*instructions from General Assembly resolutions 77/278 and 78/253*", but a review of those two resolutions does not provide a full set of rules to understand its criteria and functioning.

In short, a UN staff member whose name is entered into ClearCheck cannot point to a single, consolidated policy setting out what conduct qualifies for listing under the OM category, what procedural safeguards apply before an entry is made, or how (if at all) an entry can be reviewed or removed once made. While the UN may pride itself on the publication of the Compendium on Disciplinary Measures,[3] this compilation does not provide sufficient detail to explain the rationale for entry into ClearCheck, leaving staff members without a reasonable, consistently applied precedent to consider before lodging a Tribunal appeal.

Administrative or disciplinary measure?

UN Staff Rule 10.2 lists disciplinary measures (such as dismissal or fines) and separately lists administrative measures (such as a written reprimand). Entry into ClearCheck does not appear in either list. In litigation, the Secretary-General has taken the position that ClearCheck entry is a bare administrative act, reviewable only under the deferential standard applied to ordinary management decisions: whether the decision was reasonable, fair, and procedurally correct.

The UN Appeals Tribunal rejected that characterization in a 2026 judgment.[4] The case concerned a former UNHCR staff member who took early retirement while under investigation for an alleged sexual assault on a colleague in 2014. Since he had left the Organization, no disciplinary sanction could be imposed. The High Commissioner nevertheless issued a final determination that he had committed sexual abuse and sexual harassment and entered his name into the ClearCheck. The listing was therefore the only consequence of the finding. However, since entry into ClearCheck effectively forecloses future employment across the entire UN common system, the Tribunal held that a ClearCheck listing is, in substance, "*effectively a disciplinary and punitive measure*". It means a ClearCheck entry is reviewed on the broader standard applied to disciplinary

[3] Available here.
[4] *Herrera,* 2026-UNAT-1670.

measures (whether the underlying facts were established, whether they amount to misconduct, whether due process was respected, and whether the consequence is proportionate), not the narrower review standard applicable to administrative decisions. This case confirmed that a ClearCheck entry is indeed a disciplinary measure, but leaves open the question of whether the Administration may impose such a measure on a former staff member over whom it no longer exercises disciplinary authority.

Conclusion

ClearCheck has expanded considerably in under a decade, from a narrow SEA/SH screening tool to a system covering racism, racial discrimination, and an open-ended category of "other misconduct", all without a clear policy background. The categorization of a listing as "disciplinary" in substance, now confirmed by the Appeals Tribunal, gives an affected staff member a genuine route to challenge it. But the deeper structural question remains open: a tool capable of ending a career across the entire UN system operates, as things currently stand, without a single consolidated policy instrument that staff can use to understand the criteria governing when a name is entered, and on what basis it might ever be removed.

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