

# 2020-UNAT-1019, Houran et al

## UNAT Held or UNDT Pronouncements

UNAT held that the Appellants failed to specifically identify the errors allegedly committed by the UNRWA DT and therefore the appeals were defective for that reason but considered the appeals given that the appellants were not legally represented. UNAT held that any error on a finding of fact of when the Appellants receive notification of the administrative decision did not result in a manifestly unreasonable decision. UNAT held that whether the administrative decision was the expressed verbal communication of the denial to provide compensation or was implied from the refusal or failure to respond, the Appellants did not meet the Area Staff Rule requirement that a request for review of the administrative decision be made within 60 days. UNAT held that UNRWA DT correctly held that the applications in relation to the decision were not receivable. UNAT held that the UNRWA DT correctly determined that there was no identifiable request for decision review. UNAT held that UNRWA DT did not err in fact or law in dismissing the applications. UNAT held that the applications to UNRWA DT were not receivable either *ratione temporis* or *ratione materiae*. UNAT dismissed the appeal.

## Decision Contested or Judgment/Order Appealed

The staff members contested UNRWA's decision not to compensate them for "casual hours". UNRWA DT held the application was not receivable *ratione temporis*.

## Legal Principle(s)

Whether a decision was communicated with sufficient gravitas is relevant to the question of whether an individual was notified. Where there is no written notification, it is incumbent on the body reviewing the matter to consider whether the circumstances surrounding the verbal communication constitute notification. The fundamental requirement for a request for decision review is that the request must be an unambiguous written request which clearly identifies the staff member and the contested decision.

## Outcome

Appeal dismissed on receivability

Outcome Extra Text

No relief ordered

Full judgment

[Full judgment](#)

Applicants/Appellants

Houran et al

Entity

UNRWA

Case Number(s)

2020-1345

Tribunal

UNAT

Registry

New York

Date of Judgement

26 Jun 2020

President Judge  
Judge Sandhu  
Language of Judgment  
English  
Issuance Type  
Judgment  
Categories/Subcategories  
Jurisdiction / receivability (UNDT or first instance)  
Subject matter (ratione materiae)  
Temporal (ratione temporis)  
Applicable Law  
UNRWA Area Staff Rules

- Rule 111.2

#### Related Judgments and Orders

2018-UNAT-853  
2010-UNAT-035  
2010-UNAT-051  
2016-UNAT-694  
2017-UNAT-746  
2017-UNAT-743  
2016-UNAT-691  
2016-UNAT-679  
2016-UNAT-687