

Title: Social Security System Employees Association (SSSEA) vs. Court of Appeals and Social Security System (SSS)

Facts:

The case originated when the Social Security System filed a complaint for damages against its employees and their association, the SSSEA, due to a strike initiated by them on June 9, 1987. The employees barricaded the entrances to the SSS Building, thereby preventing non-striking employees and members from accessing the premises. The strike was in response to the SSS's inaction over the SSSEA's demands relating to labor conditions and benefits. The SSSEA demanded the implementation of provisions from their old collective bargaining agreement, payments of overtime, conversion of temporary employees to permanent status, and other related claims.

The Regional Trial Court of Quezon City issued a temporary restraining order (TRO) against the strike on June 11, 1987. The SSSEA filed a motion to dismiss based on lack of jurisdiction, which was countered by the SSS, leading to the court issuing an injunction upon the posting of a bond. Petitioners' subsequent motion for reconsideration was denied, moving them to escalate the matter to the Supreme Court by filing a petition for certiorari and prohibition with a preliminary injunction. The Supreme Court referred the case to the Court of Appeals, which decided against the SSSEA, stating government employees cannot strike and affirmed the trial court's jurisdiction over the case.

Issues:

1. Whether the employees of the SSS have the right to strike.
2. Whether the Regional Trial Court has jurisdiction to enjoin the strike, order strikers to return to work, and hear the SSS's complaint for damages.

Court's Decision:

The Court affirmed the decision of the Court of Appeals, holding that:

1. The employees of the SSS do not have the right to strike as they are considered government employees governed by civil service laws and regulations, which, as per existing rules and Executive Order No. 180, do not grant them the right to strike.
2. The Regional Trial Court indeed has jurisdiction to hear the SSS's complaint and issue an injunction to enjoin the strike since the matter is governed by civil service laws and not within the purview of the National Labor Relations Commission (NLRC). The dispute involved government employees, making it appropriate for the general courts to issue writs of injunction in such cases.

Doctrine:

The decision establishes that government employees cannot engage in strikes as a form of dispute resolution. Instead, they must navigate through the government's provisions for handling labor disputes, such as negotiation and arbitration. Additionally, it clarifies that while the NLRC has no jurisdiction over disputes involving government employees, the Regional Trial Courts do when it comes to issuing injunctive relief against illegal strikes.

Class Notes:

- Government employees in the Philippines do not have the right to strike.
- The Civil Service encompasses all government employees, including those in government-owned or controlled corporations with original charters, such as the SSS.
- Terms and conditions of government employment are governed by law, and disputes must be resolved through legal and administrative channels.
- The Regional Trial Court has jurisdiction to enjoin illegal strikes conducted by government employees and to decide on complaints for damages arising from such strikes.

Relevant Legal Statutes:

- 1987 Philippine Constitution, Article IX-B, Section 2(1): Defines the scope of the Civil Service.
- Executive Order No. 180: Provides guidelines for the exercise of government employees' right to organize.
- Labor Code (P.D. 442): Excludes government employees from its coverage, specifying that their terms and conditions of employment are governed by Civil Service Law.

Historical Background:

The case occurred in the context of the Philippines where there has been a long-standing debate on whether government employees should be allowed to strike. The 1987 Constitution and subsequent administrative orders and laws aim to balance the rights of government employees to organize and present their grievances, against the need for uninterrupted public service. This case reaffirms the ruling that, unlike their counterparts in the private sector, government employees are not granted the right to strike.