

### Title: “Cariño vs. Commission on Human Rights: The Limits of CHR’s Jurisdiction in Adjudicating Human Rights Violations”

### Facts:

The case stemmed from actions taken on September 17, 1990, by some 800 public school teachers in Manila, who conducted “mass concerted actions” to highlight their demands due to unaddressed grievances. These teachers, including the eight private respondents in the Supreme Court case, were served orders by the Secretary of Education to return to work within 24 hours or face dismissal. Subsequently, administrative charges were filed against them, leading to preventive suspensions and, for some, dismissals or suspensions after administrative proceedings.

In parallel, the Manila Public School Teachers Association (MPSTA) and the Alliance of Concerned Teachers (ACT) filed petitions for certiorari with the Supreme Court and the Regional Trial Court of Manila, challenging these administrative actions, asserting violations of their rights to due process and peaceable assembly.

Simultaneously, the respondent teachers lodged complaints with the Commission on Human Rights (CHR) alleging undue replacement and lack of formal notice, leading the CHR to initiate a case and schedule a dialogue. The CHR, despite the Solicitor General’s motion to dismiss on behalf of Secretary Cariño, arguing lack of jurisdiction and absence of a cause of action, proceeded with the case. The CHR intended to adjudicate on whether the teachers’ rights were violated and if their actions were justifiable, essentially covering ground that had been or was being addressed by the Secretary of Education and the courts.

### Issues:

1. Whether the CHR has the authority to review, reverse, or modify decisions made by the courts or quasi-judicial bodies in cases involving human rights violations.
2. Whether the CHR has adjudicatory powers over cases involving alleged human rights violations related to civil or political rights.

### Court’s Decision:

The Supreme Court unequivocally ruled that the CHR does not possess adjudicatory powers similar to a court of justice or a quasi-judicial agency. Its authority is limited to investigating all forms of human rights violations involving civil and political rights but does not extend to trying and deciding on cases. The court emphasized that investigation does not equate to adjudication, and the CHR’s attempt to resolve the matters involving the striking teachers

usurps the jurisdiction and functions of the Education Secretary and the Civil Service Commission.

**### Doctrine:**

This case established that the Commission on Human Rights is empowered solely to investigate allegations of human rights violations involving civil and political rights but does not have the jurisdiction to adjudicate or make final determinations on these matters. The role of the CHR is investigative, not adjudicatory, emphasizing a clear delineation of powers between investigative bodies and judicial or quasi-judicial entities.

**### Class Notes:**

- **Key Concept**: Delineation between investigation and adjudication.
- **Legal Statute**: Constitution of the Philippines, Article XIII, Section 17-18, outlining the powers of the CHR.
- **Application**: The CHR, while tasked with investigating human rights violations, cannot render judgments or decisions that resolve the controversies involved. Such authority resides with courts and quasi-judicial bodies.

**### Historical Background:**

The creation of the Commission on Human Rights was a response to the need for a dedicated body to investigate allegations of human rights abuses, particularly in the aftermath of the Marcos regime. This case is significant as it clarified the scope and limitations of the CHR's authority, ensuring that the delineation between investigative and adjudicatory functions is maintained, respecting the separation of powers and the specialized roles of different government bodies and agencies in the Philippine legal system.