

Title:

National City Bank of New York vs. National City Bank Employees Union

Facts:

This case arose when employees of National City Bank of New York (Petitioner) went on strike on June 11, 1952. The bank referred the issue to the Court of Industrial Relations (CIR), which issued an order on June 12, 1952, allowing the striking employees to return to their jobs the next day. The same order also permitted the bank to replace any employee who failed or refused to return to work. Subsequently, a trial was held to determine the legality of the strike, resulting in a January 5, 1953 decision by the CIR. This decision declared the strike illegal, ordered the dismissal of strike leaders, but mandated the reinstatement of 51 employees who did not return to work as initially directed. The bank sought reconsideration, arguing lack of opportunity to present evidence or confront witnesses, which was denied. The bank's appeal to the court en banc was also unsuccessful, leading to this petition for certiorari.

Issues:

1. Whether the CIR's provision allowing for the temporary replacement of striking employees granted a permanent right to the positions for new recruits.
2. Whether the CIR erred by not allowing the petitioner to cross-examine individuals whose testimonies influenced the CIR's decision to order the reinstatement of the 51 employees.
3. Whether the CIR's findings, partially based on unverified inquiries and without the petitioner's opportunity for cross-examination, violated due process.

Court's Decision:

1. The Supreme Court held that the replacement of striking employees was a provisional measure, not meant to confer permanent employment rights to new recruits. The reinstatement order, modifying the provisional order post-trial based on the strike's legality, was deemed proper, just, and legal.
2. The Court rejected the petitioner's claim that the absence of opportunity to cross-examine individuals at the inquiries constituted a violation of due process. It emphasized that the CIR's findings were based on a variety of evidence, not solely on the inquiries, indicating the 51 employees faced circumstances beyond their control preventing their return to work.
3. Furthermore, the Supreme Court noted the administrative nature of the CIR allowed flexibility in evidence considerations, suggesting strict evidentiary rules did not apply.

Doctrine:

- **Provisional Measures in Labor Disputes:** Temporary solutions implemented during labor disputes, such as employee replacements, do not determine permanent employment rights and can be adjusted following judicial review of the dispute's legality.
- **Flexibility of Evidence in Administrative Bodies:** Administrative bodies like the Court of Industrial Relations are not strictly bound by conventional rules of evidence, allowing them to consider a broader range of information in making determinations.

Class Notes:

- **Temporary Replacement of Workers:** When workers go on strike, their temporary replacement by management does not confer permanent employment status on the replacements.
- **Adjudication in Labor Disasters:** The legality of strikes and the resulting employment consequences are subject to judicial review, including the reinstatement of employees based on the circumstances preventing their return to work.
- **Role of Administrative Bodies in Labor Relations:** Bodies like the CIR operate under different procedural rules from courts of law, particularly in handling evidence, which allows them to address labor relations issues in a more flexible manner.
- **Legal Provisions:** Refer to Commonwealth Act No. 103, section 20, regarding the CIR's flexibility in evidentiary rules.

Historical Background:

This case highlights the tension between labor rights and managerial authority within the context of post-WWII Philippines, a period characterized by rebuilding and significant labor movement activities. It underscores the evolving nature of labor laws and the judiciary's role in balancing these competing interests.