

Title: UST Faculty Union (USTFU) v. Bitonio, Jr.

Facts:

The dispute arose within the University of Santo Tomas Faculty Union (USTFU). A general assembly was announced on September 21, 1996, by the Secretary General of USTFU, Ma. Melvyn Alamis, to be held on October 5, 1996, to elect new union officers. Some petitioners challenged the formation of the Committee on Elections (COMELEC) and filed a petition with the Med-Arbitrator of DOLE-NCR on October 1, 1996. They alleged the COMELEC wasn't constituted according to USTFU's Constitution and By-Laws (CBL) and that no election rules were issued.

On October 4, 1996, the Secretary General of UST allowed a faculty convocation, during which a motion was made by a non-USTFU member to suspend the USTFU's CBL and hold elections on that day. Petitioners claim they were elected USTFU officers by acclamation and clapping of hands during this assembly. The same day, the Med-Arbitrator issued a temporary restraining order (TRO) against the October 5, 1996, election.

On October 11, 1996, USTFU's existing officers filed a petition seeking injunctive reliefs and nullification of the October 4, 1996, election results. They argued that the elections violated the TRO and the USTFU's CBL. Another TRO was issued on December 11, 1996, against the petitioners. The Med-Arbitrator eventually declared the October 4, 1996, elections null and void on February 11, 1997. The decision was affirmed by Director Bitonio of the Bureau of Labor Relations on August 15, 1997, and the petitioners' motion for reconsideration was later denied.

Petitioners contended this matter to the Supreme Court, arguing that the general assembly had the right to suspend the USTFU's CBL and elect new officers.

Issues:

1. Whether the Collective Bargaining Unit could suspend the CBL of the USTFU in the general assembly to conduct elections.
2. Whether such suspension, in accordance with the right to peaceful concerted activities, was valid for ousting union leaders.
3. Whether the ratification of the CBA executed by the petitioners rendered moot the issue of the legality of the October 4, 1996, elections.

Court's Decision:

The Supreme Court dismissed the petition and upheld the decision of Director Bitonio.

1. Right to Suspend CBL: The Court ruled that the general assembly of October 4, 1996, was not a legitimate union meeting as it was not called by the USTFU according to its CBL. Thus, any election conducted and suspension of the CBL made during this assembly was invalid. The Court underscored the importance of adhering to the CBL, which is the fundamental law governing the union and its members.

2. Validity of Suspension and Concerted Activities: The Court maintained that the procedure and forum used by the petitioners to oust union leaders and conduct elections were improper. The assembly, which was attended by non-union members including those from management, was not an appropriate or lawful way to handle union matters. The Court emphasized that the right to self-organization must respect the union's own internal rules and procedures.

3. Mootness Due to CBA Ratification: The Court held that the ratification of the new CBA did not validate the October 4, 1996, election. The issue of union leadership must be decided strictly by union members following proper procedures outlined in the union's CBL and the Labor Code. Thus, the election irregularities were not rendered moot by the ratified CBA as they are distinct issues.

Doctrine:

1. Union Constitution and Bylaws: The union's constitution and bylaws are the fundamental law governing the union's operations. Legitimate union activities must adhere to this framework, and any deviation renders such activities void.

2. Right to Self-Organization: While union members have the right to self-organization, this right must be exercised in accordance with internal union rules and regulations.

3. Non-Interference: Management and non-union members must not interfere in union elections and decisions related to union leadership.

Class Notes:

- **Right to Self-Organization** (Philippine Constitution, Labor Code): Union members have the right to form, join, or assist unions for collective bargaining and mutual protection.

- **Union Elections vs. Certification Elections**: Union elections are governed by the union's bylaws, allowing only union members to vote. Certification elections determine the exclusive bargaining representative among all employees in the bargaining unit.

- **Union's Constitution and Bylaws (CBL)**: Union actions must comply with the CBL. Any actions or elections held outside these guidelines are invalid.

- **Non-Interference**: Employers and non-union members cannot interfere in union

matters (Article 241(c) of the Labor Code).

Historical Background:

The case highlights the critical balance between ensuring democratic processes within labor unions and safeguarding against unauthorized interference. It illustrates the evolving jurisprudence on union self-governance in the Philippines, emphasizing adherence to established constitutional and legal frameworks to maintain order and legitimacy within labor organizations. This decision aligns with global labor standards, particularly those espoused by the International Labour Organization (ILO), reinforcing the principle of non-interference and respect for union bylaws.