

Title: Nancy Claire Pit Celis v. Bank of Makati (A Savings Bank), Inc.

Facts:

Nancy Claire Pit Celis was hired by the Bank of Makati (hereinafter referred to as “the respondent”) as an Account Officer for its Pasay City Branch on July 15, 2013. On May 23, 2016, she was reassigned to the Legal and External Agency Department as an Administrative Officer. Toward the end of 2017, the respondent’s Human Resource Department was informed of Celis’ past employment in the Rural Bank of Placer and potential involvement in an embezzlement case—information she did not disclose when she applied to the Bank of Makati.

Upon receiving this information, the respondent sent Celis a Notice of Explanation on December 13, 2017, and subsequently placed her under a 30-day preventive suspension beginning December 18, 2017. Celis countered that she omitted her past employment due to excitement and denied involvement in any embezzlement case, describing it as gossip. A conference was held on January 8, 2018, for Celis to verbalize her explanations.

The respondent terminated Celis’ employment on January 10, 2018, citing a violation of the Bank’s Code of Conduct for “knowingly giving false or misleading information in applications for employment” and “Serious Misconduct, Fraud or Willful Breach of Trust and Loss of Confidence” under Article 297 of the Labor Code. Prior infractions from 2016 were also considered in the decision to dismiss.

Celis filed a Complaint for illegal dismissal, monetary claims, and damages, asserting that her termination arose from her discovery of corruption by her supervisors. She claimed good faith in omitting her previous employment details and that there was no proof of her involvement in the embezzlement case.

The Labor Arbiter ruled in favor of Celis, declaring the dismissal illegal and ordering the respondent to pay monetary awards. The respondent partially appealed to the NLRC, which affirmed the LA’s decision. The respondent then moved for reconsideration, which was denied by the NLRC.

The respondent then sought recourse with the Court of Appeals (CA), which reversed the NLRC’s decision and held the dismissal valid, applying the Principle of Totality of Infractions to justify the dismissal. Celis filed a motion for reconsideration, but it was denied by the CA.

Celis then brought the case to the Supreme Court under Rule 45 of the Rules of Court after

the unfavorable CA decisions.

Issues:

1. Whether the respondent validly dismissed Celis from employment; and
2. Whether the Court of Appeals committed grave abuse of discretion.

Court's Decision:

The Supreme Court held that the respondent did not validly dismiss Celis and that the CA erred in imputing grave abuse of discretion on the part of the NLRC. The Court deviated from the general rule and reviewed the records as the case involved a conflict of findings between the NLRC and the CA. The SC restored the decisions of the labor tribunals, with modifications regarding the computation of legal interest on the monetary awards.

Doctrine:

1. Substantial Evidence: The Court emphasized that in labor cases, substantial evidence, which is the amount of relevant evidence that a reasonable mind might accept as adequate to justify a conclusion, is the required quantum of proof.
2. Protection to Labor: The Constitution demands that doubts in interpreting labor contracts or legislation be resolved in favor of labor.
3. Principle of Totality of Infractions: Prior infractions may be considered in determining the sanction against an employee provided these are related to the subsequent offense upon which termination is decreed.

Class Notes:

- In illegal dismissal cases, the employee must be afforded both substantive and procedural due process.
- For termination due to misconduct, the employee's conduct must constitute a just cause as defined under Article 297 of the Labor Code, and the employer must observe the twin notices and hearing requirements.
- The principle of "Protection to Labor" mandates that any doubts in legal provisions or evidence should be resolved in favor of labor.
- Principle of Totality of Infractions only applies when the employee's previous misconduct and the subsequent infraction are of a similar nature, and the previous infraction cannot be used to justify the current offense if there is no substantial evidence to support either.

Historical Background:

The case provides an insight into the practical application of dismissal procedures in the

Philippines and emphasizes the protective mantle the law affords employees. It also reiterates the Supreme Court's power to review factual findings in certain circumstances, particularly when the findings from quasi-judicial agencies and appellate courts disagree. It encapsulates the evolution of the doctrine referencing the Principle of Totality of Infractions as earlier established in jurisprudence, emphasizing the dynamics between an employer's administrative control over its workforce and the overarching legal protections for employees.