

Title: Villavert v. Employees' Compensation Commission & Government Service Insurance System (Philippine Constabulary)

Facts:

Domna N. Villavert petitioned for the review of the Employees' Compensation Commission's decision, which affirmed the Government Service Insurance System's (GSIS) denial of her claim for death benefits due to her son, Marcelino N. Villavert's passing. Marcelino died of acute hemorrhagic pancreatitis on December 12, 1975, while employed as a Code Verifier at the Philippine Constabulary. Domna filed a claim with the GSIS on March 18, 1976, under P.D. No. 626, as amended. The GSIS denied the claim, arguing that acute hemorrhagic pancreatitis was neither an occupational disease nor was there evidence to suggest a connection between Marcelino's work and his death. The case escalated to the Employees' Compensation Commission, which upheld GSIS's decision. Marcelino's duties also included computer operation and clerical tasks due to personnel shortages, and he experienced a particularly demanding work day before his death, involving overtime work and physical distress.

Issues:

1. Whether acute hemorrhagic pancreatitis, the cause of Marcelino N. Villavert's death, is compensable under P.D. No. 626 as an occupational disease.
2. Whether there was sufficient proof to establish a causal connection between Marcelino's duties as an employee and his fatal ailment.

Court's Decision:

The Supreme Court reversed the decision of the Employees' Compensation Commission, ruling in favor of Domna N. Villavert. The Court found that despite not being listed as an occupational disease, acute hemorrhagic pancreatitis was directly caused or at least aggravated by Marcelino's duties, considering the substantial physical and mental strains involved. It emphasized the principle of resolving doubts in favor of labor, detailed in Article 4 of the Labor Code of the Philippines, as amended. Consequently, the GSIS was ordered to pay Domna death benefits amounting to SIX THOUSAND PESOS (P6,000.00).

Doctrine:

This case reinforces the doctrine of liberal interpretation in favor of labor, especially in the context of compensation for workplace-related injuries and diseases. It underscores the principle stated in Article 4 of the Labor Code of the Philippines, which mandates that any doubts in the implementation and interpretation of the Code, including its implementing

rules and regulations, shall be resolved in favor of labor.

Class Notes:

1. ****Occupational Disease and Compensability****: Not all diseases directly listed as occupational can be compensable; a disease can be deemed compensable if proven to be caused or aggravated by the conditions of employment.
 2. ****Liberal Interpretation in Favor of Labor****: In cases of doubt in interpreting laws or regulations concerning labor rights and benefits, the interpretation that favors the working class should prevail.
 3. ****Evidence in Compensation Claims****: The presentation of substantial evidence showcasing the connection between occupational activities and the disease or injury is crucial for a successful compensation claim.
- Relevant Statutory Provision: Article 4 of the Labor Code of the Philippines (as amended).

Historical Background:

At the time of the case, the legal framework governing employees' compensation and benefits was experiencing notable developments, with principles reaffirming the state's commitment to protect labor rights being crystallized in jurisprudence. This case is set against a backdrop where the judiciary played a pivotal role in expanding the interpretation of laws to safeguard workers' welfare, reflecting the broader socio-legal evolution towards enhanced labor protection in the Philippines.