

****Title:**** St. Francis High School vs. Castillo

****Facts:****

Ferdinand Castillo, a freshman at St. Francis High School, desired to join a picnic at Talaan Beach, Sariaya, Quezon, organized by Classes I-B and I-C. However, his parents, Dr. Romulo Castillo and Lilia Cadiz, did not allow him to join due to short notice. They allowed him to deliver food to the teachers with instructions to return home afterward. Persuaded by the teachers, Ferdinand stayed and joined the picnic. While swimming, a teacher appeared to be drowning, and Ferdinand attempted to help but drowned in the process.

Grieving, Ferdinand's parents filed a damage complaint (Civil Case No. 8834) against St. Francis High School, represented by the spouses Nantes and Lacandula, principal Benjamin Illumin, and teachers. They alleged a failure to exercise the proper diligence to prevent their son from drowning.

The RTC ruled in favor of the parents, attributing negligence to the teachers and ordering them to pay damages. The school and principal were absolved of liability, as the picnic was not a sanctioned school activity. Dissatisfied with the RTC's decision, both sides appealed. The Court of Appeals held the school and principal liable based on Article 2176 and Article 2180 of the Civil Code, arguing that they exercised insufficient control and supervision. They upheld the moral and actual damages awarded by the trial court and added exemplary damages.

****Issues:****

1. Whether the defendants were negligent, warranting an award of damages.
2. Whether Article 2180, in relation to Article 2176 of the Civil Code, applies to the case.
3. Whether awarding exemplary and moral damages is proper under the circumstances.

****Court's Decision:****

The Supreme Court reversed the Court of Appeals' decision, citing insufficient evidence of negligence by the school and teachers as per the law.

****Negligence Attribution:****

- The Court acknowledged that Ferdinand's parents consented to his participation in the picnic. Therefore, responsibility partly lay with them. They emphasized that although teachers are typically held responsible for students' welfare, negligence must be clearly demonstrated, notably absent in regards to the teachers' preparations and responses before the drowning incident.

- The Court highlighted petitioners' diligent preparations for the picnic, such as inviting well-trained personnel for first aid and lifesaving and having safety measures like life savers. Specifically, teachers exerted considerable effort in rescue operations post-incident.

****Applicability of Article 2180:****

- The Court determined that Article 2180, which details employer liabilities for employees' negligence, was inappropriately applied. Since the picnic was not a school-sponsored event, the teachers were not performing official tasks, making the liability provisions inapplicable.
- The principle that liability of employers arises from duties performed within the scope of employment tasks was reaffirmed.

****Moral and Exemplary Damages:****

- Given the unestablished negligence on the teachers' part, the Supreme Court found no grounds for moral and exemplary damages. As the law necessitates clear wrongful acts or omissions causally linked to the inflicted damages, the parents' claim for such damages was legally unsupported.

****Doctrine:****

- ****Employer Liability under Article 2180:**** Liability of employers for damages caused by their employees is contingent upon the employee acting within assigned tasks.
- ****Parental Consent and Responsibility:**** Parental consent to a child's participation in non-sanctioned activities can influence liability determinations.
- ****Diligence of a Good Father:**** This diligence standard requires proactive and prudent preparation and intervention to prevent foreseen harm.

****Class Notes:****

- ****Torts and Quasi-Delicts:**** Elements include duty, breach, causation, and damages.
- ****Article 2180:**** Employers are liable for employees' acts within the scope of their employment tasks, rebuttable by showing exercised diligence.
- ****Negligence:**** Defined as the failure to exercise the care that a reasonably prudent person would exercise in like circumstances.
- ****Moral Damages (Article 2219):**** Awarded for quasi-delicts causing physical injuries, including mental anguish and emotional suffering.

****Historical Background:****

The case underscores evolving jurisprudence on employer liability and negligence in the Philippines, particularly in educational settings. It contextualizes the balance of liability

among schools, teachers, and parents against the broader public duty of student safety and supervision.