

**\*\*Title:** Galceran vs. Secretary of Labor and Hi-Cement Corporation**\*\***

**\*\*Facts:\*\***

- Noel Galceran, an employee of Hi-Cement Corporation since 1968 as a pre-heater operator, earned a daily wage of P9.80.
- On May 17, 1970, while working, Galceran's helmeted head was caught by the drive V-belts of the plant's kiln pre-heater, dragging his body and smashing him against a wheel. He suffered extensive injuries to his head, neck, and body.
- He was admitted to ABM Sison Hospital from May 17 to July 20, 1970, where he was treated by Dr. V. Basilio and Dr. Nicolas, both associated with the hospital and the respondent company.
- Dr. V. Basilio's report indicated that Galceran sustained "extensive avulsion with lacerations & loss of tissues of scalp & neck" and "severe cerebral concussion."
- Post-hospitalization, Galceran became mentally unstable and committed suicide by hanging on August 5, 1970.
- On March 31, 1975, Lilia B. Galceran, the petitioner's widow, filed a notice and claim for death compensation with the Department of Labor, Regional Office No. 4, Workmen's Compensation Section.
- The Acting Referee required both parties to submit affidavits during the initial hearing on October 14, 1975.
- On October 24, 1975, the Acting Referee dismissed the claim, citing suicide as a non-compensable cause of death.
- Petitioner's counsel filed a motion to set the case for a hearing, which was denied by the Secretary of Labor on August 10, 1977.
- A subsequent motion for reconsideration filed on November 25, 1977, was denied on January 20, 1978, for lack of merit.
- Lilia B. Galceran then filed a petition for review with the Supreme Court, contending that her husband's insanity, caused by work-related injuries, led to his suicide, making his death compensable.

**\*\*Issues:\*\***

1. Whether Noel Galceran's death by suicide was a compensable work-related death under the Workmen's Compensation Act.
2. Whether the injuries sustained by Noel Galceran led to mental derangement and a consequent lack of willful intent in his act of suicide.
3. The admissibility and weight of the medical opinion provided by Dr. Benvenuto T. Juatco in the absence of direct testimony.

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

1. **\*\*Compensability of Death by Suicide:\*\***

- The Court ruled that Galceran's death was indeed compensable under the Workmen's Compensation Act. It emphasized that the original injuries sustained were work-related and contributed to Galceran's mental instability and subsequent suicide.
- The Court cited Section 2 of the Workmen's Compensation Act, which includes compensation for injuries arising out of and in the course of employment.

2. **\*\*Intentional Act of Suicide:\*\***

- The Court held that the act of suicide was not a voluntary willful intent to inflict self-harm because Galceran was mentally deranged at the time due to his work-related injuries.
- The Court referred to precedents and logical applications, emphasizing that insanity caused by work-related injuries that led to suicide should be considered in determining compensability.

3. **\*\*Medical Opinion Validity:\*\***

- Despite the objection to Dr. Juatco's medical opinion (since he did not personally treat Galceran), the Court found it sufficient and aligned with the facts presented.
- The Court noted that in Workmen's Compensation cases, substantial evidence rather than preponderance of evidence is applied.

The Court reversed the Secretary of Labor's decision and the Acting Referee's order, directing Hi-Cement Corporation to provide compensation, burial expenses, attorney fees, and administrative fees to Lilia B. Galceran and her daughter.

**\*\*Doctrine:\*\***

- **\*\*Doctrine of Compensability in Work-Related Suicides:\*\*** The Court established that suicide resulting from mental derangement caused by work-related injuries is compensable under the Workmen's Compensation Act.
- **\*\*Substantial Evidence Standard:\*\*** In determining compensability, the substantial evidence requirement is sufficient over the preponderance of evidence.

**\*\*Class Notes:\*\***

- **\*\*Elements of Workmen's Compensation Claim:\*\***

1. Personal injury or illness arising out of and in the course of employment.
2. Compensation for death, injury, or illness directly attributed to employment.
3. Exemptions under Sec. 4 for injuries from voluntary actions, drunkenness, or notorious

negligence.

- **Relevant Statutory Provisions:**

- **Section 2:** Grounds for compensation include injuries arising out of employment.

- **Section 4:** Exempts injuries caused by the voluntary intent to inflict self-harm, drunkenness, or notorious negligence.

- **Application in the Case:**

- Insanity post-injury negates voluntary intent.

- The substantial evidence rule upheld the compensability of the work-related mental derangement leading to suicide.

**Historical Background:**

- This case occurred within the context of early 1970s labor laws in the Philippines, specifically under the provisions of the now-defunct Workmen's Compensation Act.

- The Court adhered to social justice principles and a liberal interpretation of labor laws to protect and compensate workers and their dependents fairly.