

Title: ****Pasay City Alliance Church/CAMACOP/Rev. William Cargo vs. Fe Benito****

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****Facts:****

1. Fe P. Benito, a licensed Christian Minister with CAMACOP, served various roles at Pasay City Alliance Church (PCAC) since completion of her Religious Education degree sponsored by the church.
2. In 2005, Benito was appointed as Head of Membership and Evangelism Ministry, later renamed Pastoral Care and Membership, and served without a written contract under the supervision of the Church Ministry Team (CMT) and Senior Pastor, Rev. William Cargo.
3. CAMACOP's policy mandated ministers without written contracts to tender a yearly courtesy resignation. This policy was implemented at PCAC starting in 2009.
4. Benito complied with this requirement in 2011 and was reappointed to the same position. In 2012, the CMT decided not to reappoint Benito, citing various shortcomings.
5. Despite the 2012 decision, Benito continued in her role for another year. In 2013, she again submitted a courtesy resignation as instructed, but was finally informed in December 2013 that her position would not be extended.
6. Benito, feeling aggrieved, filed a complaint for illegal dismissal, damages, and attorney's fees with the Labor Arbiter, claiming she had earned regular status through long service.

****Procedural Posture:****

1. The Labor Arbiter ruled in favor of Benito, declaring an employer-employee relationship existed and ordered payment of back wages and separation pay.
2. PCAC appealed to the National Labor Relations Commission (NLRC), which reversed the Labor Arbiter's decision, stating that the issue was ecclesiastical and hence outside its jurisdiction.
3. Benito sought relief from the Court of Appeals (CA), which annulled the NLRC's resolutions, remanding the case to the NLRC for decision on the merits.
4. PCAC petitioned the Supreme Court, contesting the CA's decision claiming the issue was ecclesiastical and asserting non-jurisdiction by labor tribunals.

****Issues:****

1. Whether the termination of Benito by PCAC for administrative lapses was a secular decision or an ecclesiastical affair.

2. Whether labor tribunals have jurisdiction to adjudicate the dismissal of a religious minister.
3. The applicability of CAMACOP's internal guidelines versus the Labor Code.

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

1. The Supreme Court granted the petition, determining that the dismissal involved ecclesiastical affairs.
2. The relationship between PCAC and Benito was governed by CAMACOP's internal ecclesiastical rules rather than secular laws since the decision concerned Benito's ministerial effectiveness in pastoral care, a position entailing religious duties.
3. The State should not interfere with the church's internal governance about ministerial duties and reassignments, aligning with constitutional separation of church and state.

****Doctrine:****

1. ****Ecclesiastical Abstention Doctrine:**** The court reinforced the principle that secular tribunals do not have jurisdiction over ecclesiastical decisions concerning religious ministers' effectiveness and reassignments.
2. ****Separation of Church and State:**** Confirmed the inviolability of religious organizations' right to self-governance concerning matters of faith and administration.

****Class Notes:****

- ****Key Elements/Concepts:****
- ****Employer-Employee Relationship:**** Assessment involves control, salary, nature of work, and social security contributions.
- ****Ecclesiastical Affairs:**** Matters involving religious doctrine, worship, congregational governance.
- ****Separation of Church and State:**** Prohibits state interference in religious ceremonies, governance, and doctrines.
- ****CAMACOP's Guidelines:**** Ministers without contracts to submit courtesy resignations annually, subject to reassignment (illustrative of ecclesiastical self-governance).

****Historical Background:****

- The case is pivotal in the context of the Philippine legal landscape, emphasizing the non-interference stance in matters involving ecclesiastical internal governance. This ruling

reiterates the constitutional mandate separating church and state, spotlighting the judiciary's balancing act in protecting religious freedom while ensuring labor rights are not overstepped.