

Labor Jurisprudence Analysis: Strengthening the Human Resource Policy

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Abstract

This study employed a Descriptive-Interpretive Qualitative Research design to examine 108 Philippine Supreme Court labor jurisprudence decisions from 2016 to 2020 with the aim of informing and strengthening human resource (HR) policy frameworks. Anchored in Jaap Paaauwe's Contextually Based Human Resource Theory and aligned with United Nations Sustainable Development Goal 8 (Decent Work and Economic Growth), the analysis utilized Braun and Clarke's thematic approach and Krippendorff's content analysis method. The findings revealed five core themes defining employee-employer relationships: (1) Selection and Engagement, (2) Capacity to Dismiss, (3) Employer's Authority Over Work Methods and Practices, (4) Payment of Wages, and (5) Economic Dependence. Likewise, three themes emerged under employment practices: (1) Termination Practices, (2) Discipline Practices, and (3) Evaluation Practices. Further, the study evaluated the political and philosophical orientations of judicial decision-makers, revealing a spectrum from legal realism to textualism and constructionism. These orientations influenced court rulings and legal interpretations. Using Dedoose software, coding reliability was validated via Cohen's Kappa. The study culminated in the development of the ECJ (Evidence-Informed, Contextualized, and Justice-Oriented) HR Policy Framework, offering strategic, jurisprudence-based HR policies designed to foster fairness, compliance, and resilience in organizations. The study holds implications for HR professionals, policy-makers, decision-making software developers, and labor rights advocates aiming to enhance industrial peace and organizational justice.

Keywords: *Labor jurisprudence; HR policy; employee-employer relationship; employment practices; thematic-content analysis*

1. Introduction

Employment, labor conditions, human resource (HR) policies, and labor jurisprudence significantly shape the employer-employee relationship and influence the broader organizational and societal systems. Employment, defined as the provision of work in exchange for compensation, serves as a fundamental pillar of economic stability and individual well-being (Lussier & Hendon, 2020). Labor conditions, including wages, hours, health, and safety, create the framework within which employees perform their duties (Labor Code of the Philippines, 2022). HR policies, comprising the operational rules that govern workforce management, are influenced by labor jurisprudence—court decisions and principles that interpret and enforce employment laws (Merriam-Webster, 2022; LII/Legal Information Institute, 2022; West, 2011).

The intricate interplay among these factors is critical for researchers, practitioners, and policymakers. Labor regulations and judicial rulings have a direct impact on HR practices, ultimately affecting labor conditions and organizational outcomes. Effective HR policies informed by labor jurisprudence promote equitable working conditions, support employee development, and enhance organizational prosperity (Hatten, 2012).

As Steiner (2019, p.5) emphasized in the United Nations Human Development Report, addressing systemic inequalities—including those tied to labor conditions—is essential for fostering equitable human development. Furthermore, climate change, technological shifts, and social disparities increasingly shape labor markets, necessitating a reevaluation of traditional HR policies to meet emerging challenges.

Seminal cases such as *National Labor Relations Board v. Jones & Laughlin Steel Corporation* (1937) and the Equal Pay Act (1963) exemplify how judicial decisions have historically transformed HR practices. In the Philippine context, rulings like *Philippine Association of Service Importers, Inc. v. Secretary of Labor and Employment* (G.R. No. 81958, 1988) and *Philippine Airlines, Inc. v. Secretary of Labor and Employment* (G.R. No. 160798, 2005) have reinforced the protection of workers' rights and the enforcement of fair employment practices.

Nevertheless, gaps remain in understanding the broader impacts of labor jurisprudence on HR networks, particularly in non-Western contexts (Paauwe, 2004; Karkkainen, 1994). Moreover, the COVID-19 pandemic has compounded the complexity of employment relationships, highlighting the urgency of adaptive, flexible, and jurisprudence-informed HR policies (Bapuji et al., 2020).

This study is anchored on Jaap Paauwe's Contextually Based Human Resource Theory (2004) and the United Nations Sustainable Development Goals (SDGs), particularly Goal 8 on decent work and economic growth. Paauwe's framework emphasizes the contextual forces—market, organizational, sociopolitical, and legal—that influence HR policy formulation. Simultaneously, the SDGs provide a holistic vision for promoting inclusive, sustainable labor systems globally.

A brief review of related literature underscores the necessity of jurisprudence-informed HR policies. Jurisprudence studies have shown that judicial attitudes and political leanings can influence labor dispute outcomes (Segal & Spaeth, 2002; Epstein & Knight, 1998). Research by Fraisse et al. (2011), Wang and Cooke (2021), and Desrieux and Espinosa (2018) confirms that labor court decisions affect market flows, employment stability, and the strategic behavior of organizations.

31 Additionally, the rule of law, as highlighted by the World Justice Project (2021), remains foundational to maintaining fair labor practices. However, the Philippines' low regulatory enforcement score within the Asia-Pacific region indicates persistent challenges in labor policy implementation and judicial consistency.

Thus, this study seeks to systematically analyze Philippine labor jurisprudence from 2016 to 2020 through a descriptive-interpretative qualitative research design. Specifically, it aims to (1) examine employee-employer relationships in labor disputes, (2) analyze employment practices adjudicated by the courts, (3) understand the political and philosophical leanings of judicial decision-makers, and (4) propose an evidence-based HR policy framework. In doing so, the study contributes to strengthening HR systems that are legally compliant, fair, and adaptable to contemporary challenges.

2. Objectives

This study aimed to describe and analyze labor jurisprudence to inform the development of human resource (HR) policies in organizations. Specifically, it sought to achieve the following objectives: (1) To examine the employee-employer relationships in the labor disputes that shaped court decisions. (2) To analyze the employment practices involved in the labor disputes that influenced court rulings. (3) To determine the political and philosophical compositions of the judicial decision-makers that impacted the judicial outcomes. (4) To propose a human resource (HR) policy framework based on the findings of the analysis.

37 Materials and methods

Research Design

The study adopted a Descriptive-Interpretative Qualitative Research design, as delineated by Elliott and Timulak (2021). The approach emphasized open-ended exploration, systematic organization of 22 n-numerical verbal data, and the construction of an integrated, interpretive narrative. Thematic analysis (Braun & Clarke, 2006) and qualitative content analysis (Krippendorff, 2018) were employed as complementary analytical frameworks.

Data Source

Primary data consisted of labor dispute decisions rendered by the Philippine Supreme Court from 2016 to 2020, obtained via the Philippine Supreme Court E-Library. The E-Library, established under the Judicial Reform Support Project, offers authenticated and comprehensive access to Philippine legal jurisprudence.

Sampling Procedure

A purposive sampling strategy was utilized to extract 108 labor jurisprudence cases. Inclusion criteria required that cases involve key aspects of employee-employer relationships, employment practices, or judicial decision-making philosophies. Cases were selected to represent diverse industries, dispute types, and geographic regions to enhance the study's analytical breadth.

Data Collection Protocol

A customized data search protocol was developed to systematically retrieve relevant cases. Search queries were constructed using Boolean operators, and advanced options such as stemming and fuzzy searching were enabled to maximize retrieval sensitivity. Results were sorted by relevance and date, and extracted cases were archived in a localized research database.

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Data Analysis

The extracted data were analyzed using Dedoose, a cloud-based qualitative analysis software. Thematic analysis followed Braun and Clarke's (2006) six-phase framework: familiarization with the data, generating initial codes, searching for themes, reviewing themes, defining and naming themes, and producing the report. In parallel, qualitative content analysis as described by Krippendorff (2018) was conducted to systematically categorize excerpts and quantify the presence of key concepts and themes.

Cohen's Kappa was used to assess inter-rater reliability during the validation phase of the coding process. Reflexivity journals were maintained throughout the analysis to ensure critical awareness of the researcher's potential biases and expectations. External reviewers were consulted during validation exercises to further ensure rigor, transparency, and reliability.

Ethical Consideration

As the research involved only secondary data from publicly available Supreme Court rulings, no personal information requiring consent was processed. Confidentiality of individuals mentioned in the cases was preserved by anonymizing personally identifiable information where applicable. The researcher ensured that the use of secondary data respected the original intent of the sources and maintained the accuracy, reliability, and ethical use of judicial documents.

4. Results

This section presents the findings of the study based on the analysis of 108 labor jurisprudence cases decided by the Philippine Supreme Court from 2016 to 2020. Results are organized into subsections to systematically address the employee-employer relationships, employment practices, and the political and philosophical composition of judicial decision-makers. All analyses were conducted to answer the research questions outlined in the study objectives.

4.1 Case Profiles

Labor jurisprudence cases were profiled based on region, case type, industry sector, labor dispute type, and case outcome.

Table 1 Case Profile by Region Summary

Region	Number of Labor Cases	Percentage
NCR	84	77.78
Region IV-A	2	1.85
Region III	2	1.85
Region IV-A	8	7.41
MIMAROPA	1	0.93
Region V	2	1.85
Region VI	1	0.93
Region VII	4	3.70
Region VIII	1	0.93
Region X	1	0.93
Region XI	2	1.85
Region XII	1	0.93
BARMM	1	0.93

Note: NCR had the highest concentration of cases at 77.78%.

Table 2 Case Profile by Case Type Summary

Case Type	Number of Labor Cases	Percentage
Collective	40	37.04
Individual	68	62.96

Note: Most labor disputes were individual cases.

Table 3 Case Profile by Industry Sector Summary

Industry Sector	Number of Labor Cases	Percentage
Maritime Employment Services	24	22.22
Education	5	4.63
Financial Services	3	2.78
Food Service Solution, Food and Beverage Services	6	5.56
Hotel	5	4.63
Manufacturing	14	12.96
Banking	5	4.63
Media and Entertainment	2	1.85
Real Estate	1	0.93
Security Services	4	3.70
Transportation	5	4.63
BPO	2	1.85
Agricultural-Cooperative	1	0.93
Rides Rental Services	1	0.93
Energy Producer	1	0.93
Automotive , Automotive Services	3	2.78
Building Technology Solutions	1	0.93
Construction	3	2.78
Container Shipping Services	1	0.93
Death Care Services	1	0.93
Distribution	6	5.56
Health Care	1	0.93
Management Services	2	1.85
Meat Processing and Production	1	0.93
Mining Services	1	0.93
Packing Solution	1	0.93
Publishing- Educational Material	1	0.93
Telecommunication	1	0.93
Janitorial Employment Services	1	0.93

Sugar	2	1.85
Utilities-Electricity	3	2.78

Note: Maritime Employment Services had the largest proportion of labor disputes.

Table 4 Case Profile by Labor Dispute Summary

Labor Dispute	Number of Labor Cases	Percentage
Illegal Dismissal	40	37.04%
Disability Claims	22	20.37%
Constructive Dismissal	15	13.89%
Employment Claims	12	11.11%
Unfair Labor Practice	7	6.48%
Loss of Trust and Confidence	6	5.56%
Monetary Claims	6	5.56%

Note: Illegal dismissal was the most frequent dispute type.

Table 5 Case Profile by Outcome Summary

Outcome	Number of Labor Cases	Percentage
Affirmed	33	30.56
Reinstated	24	22.22
Affirmed With Modification	14	12.96
Affirmed in Toto	5	4.63
Reversed and Set Aside	5	4.63
Denied	4	3.70
Reverses and Set Aside	4	3.70
Modified	4	3.70
Reinstated with Modification	4	3.70
Dismissed	2	1.85
Reinstated and Affirmed	2	1.85
Remanded	2	1.85
Granted and Set Aside	1	0.93
Set Aside	1	0.93
Affirmed and Reinstated with Modification	1	0.93
Reversed	1	0.93
Resolves	1	0.93

Note: Affirmed decisions were the most common outcome.

4.2 Employee-Employer Relationships

A total of 108 Supreme Court labor jurisprudence cases from 2015 to 2020 were reviewed, of which 100 cases met the criteria for detailed analysis. The analysis, guided by Braun and Clarke's (2006) thematic analysis and Krippendorff's (2018) content analysis framework, aimed to identify major themes that defined employee-employer relationships influencing court decisions.

4.2.1 Major Themes

The study identified five major themes shaping the employee-employer relationship in labor disputes:

1. Control and Authority Over Work:
The employer's ability to supervise, prescribe work methods, evaluate performance, and enforce disciplinary actions was central in determining employment relationships.
2. Selection and Engagement:
Formal hiring practices, defined job roles, promotion histories, and repeated engagements were used as indicators of a valid employment relationship.
3. Capacity to Dismiss and Discipline:
Termination practices including formal dismissal procedures, repatriation in maritime employment, and constructive dismissal scenarios were common grounds for disputes.
4. Payment of Wages:
Regularity of salary payments, structured compensation systems, and special payment arrangements were evaluated as indicators of employment relationships.
5. Economic Dependence:
Employees' dependence on employers for livelihood and the indispensability of their services were used to assess employment ties under the economic dependence test.

These major themes are summarized in Table 6.

Table 6 Themes and Descriptions – Employee-Employer Relationship

Theme	Description
Control and Authority Over Work	Employer's supervision, issuance of directives, performance evaluations, disciplinary actions.
Selection and Engagement	Hiring methods, formal contracts, role clarity, long-term engagements.
Capacity to Dismiss and Discipline	Procedural and substantive grounds for termination.
Payment of Wages	Regular wage payments, structured compensation, special arrangements.
Economic Dependence	Employee's financial reliance on the employer's business operations.

Note: Operational definitions grounded in jurisprudential analysis.

4.2.2 Theme Frequencies

Analysis of the coded data revealed that issues related to Capacity to Dismiss – Inactive Employment Status, Capacity to Dismiss – Disciplinary Actions, Selection and Engagement – Specific Roles and Responsibilities, and Payment of wages were the most frequent themes identified across the analyzed cases.

Figure 1 presents the cloud of themes indicating the most prominent relationship dynamics.



Figure 1 Cloud of Themes -Employee-Employer Relationship

4.2.3 Co-occurrence of Themes and Dispute Types

The co-occurrence analysis revealed that:

In illegal dismissal disputes, “Capacity to Dismiss – Inactive Employment Status” (26 times) was most prevalent followed by “Capacity to Dismiss – Disciplinary Actions” (20) and “Selection and Engagement – Specific Roles and Responsibilities” appeared 16 times.

In disability claims, “Selection and Engagement – Through Contracts” (14 times) and “Employer’s Authority Over Work Methods and Practices” (13 times) were predominant.

In constructive dismissal cases, “Selection and Engagement – Specific Roles and Responsibilities” appeared 9 times, followed by “Payment of Wages – Regular Payments” (8 times) and “Capacity to Dismiss – Disciplinary Actions” (7).

These patterns are visualized in Figure 2.

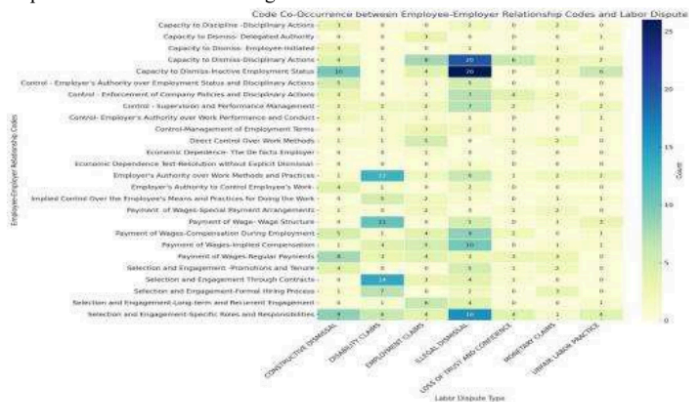


Figure 2 Themes Co-Occurrence Employee-Employer Relationship and Labor Dispute

4.2.4 Relationship of Themes to Court Outcomes

The analysis revealed that the presence or absence of key employee-employer relationship factors significantly influenced court outcomes, as illustrated in Figure 4. Cases where employees had clearly defined roles and employers demonstrated adherence to due process often resulted in outcomes favoring employer defenses. For instance, larger bubbles in Figure 4 corresponding to the theme "Selection and Engagement – Specific Roles and Responsibilities" were associated with favorable rulings for employers, such as Affirmed in Toto and Dismissed. This indicates that courts were more likely to uphold employer actions when job roles and expectations were well-defined and properly documented.

In contrast, for the theme "Capacity to Dismiss – Disciplinary Actions", outcomes such as Modified and Affirmed and Reinstated with Modification were prevalent. These outcomes suggest that even where employers exercised disciplinary authority, the courts closely scrutinized whether due process was strictly followed. Procedural deficiencies often resulted in modifications to the original rulings or reinstatement of employees, reflecting the courts' emphasis on procedural fairness in dismissal cases.

Additionally, the theme "Employer's Authority Over Work Methods and Practices" was frequently linked to outcomes such as Reinstated with Modification and Affirmed and Reinstated with Modification. This pattern demonstrates that judicial rulings were significantly influenced by how employers exercised their control over employees' work performance, reinforcing the need for legally grounded supervision practices.

The theme "Payment of Wages – Regular Payments" also showed a decisive impact on court decisions. Larger bubbles in Figure 4 associated with this theme corresponded to outcomes like Modified and Affirmed and Reinstated with Modification. Courts often ruled to uphold the employees' claims when consistent and regular wage payments were not maintained, affirming the essential role of wage regularity in supporting stable and lawful employment relationships.

The associations between key relationship themes and case outcomes are depicted in Figure 4.

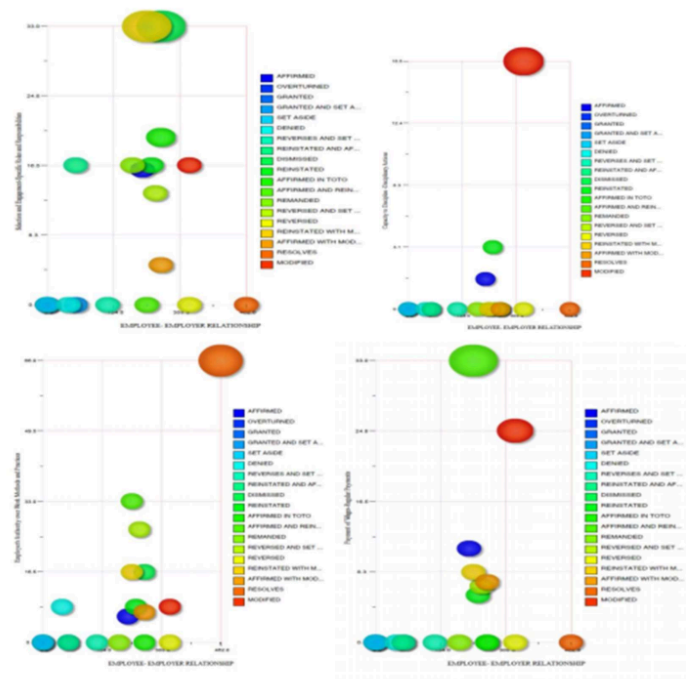


Figure 4 Relationship of Employee-Employer Relationship Key Themes and Labor Cases Outcome

4.2.5 Application of Themes in Jurisprudence

The application of key themes was further exemplified through selected Supreme Court labor cases that highlighted how employee-employer relationships shaped judicial outcomes.

The G.R. No. 219430 under the theme “Selection and Engagement – Specific Roles and Responsibilities,” involving a case of illegal dismissal. The Court ruled that the employer failed to clearly define the employee’s job expectations and did not sufficiently justify the termination based on insubordination. This decision underscores the importance of well-structured roles and the fair application of expectations in disciplinary actions. The Court reinstated the NLRC’s ruling with a modification in the separation pay computation, reinforcing the principle that both procedural and substantive fairness must be observed in employment termination. The case affirms that ambiguities in role definition and misapplication of disciplinary grounds can lead the Court to rule in favor of the employee.

Also in G.R. No. 224319 involved a case of constructive dismissal of a probationary employee under the theme “Selection and Engagement – Specific Roles

and Responsibilities.” The Court found that the employer’s failure to assign duties or clarify role expectations during the probationary period amounted to constructive dismissal. Although it affirmed the NLRC’s ruling, the Court modified the award by deleting a portion of the back wages, reflecting the nuanced evaluation of just compensation. This case illustrates that probationary status does not exempt employers from their obligation to define and honor role assignments, and failure to do so can lead to rulings in favor of the employee.

Lastly, in G.R. No. 238842, the Court addressed a disability claim under the theme “Selection and Engagement – Specific Roles and Responsibilities,” focusing on the employer’s failure to provide a timely and definitive medical assessment of the employee’s condition. This procedural lapse, in violation of the Collective Bargaining Agreement (CBA) and labor regulations, triggered the legal presumption that the disability was both total and permanent. The Court ruled to reinstate the NLRC’s decision in full, awarding permanent total disability benefits and attorney’s fees. The case illustrates that the employer’s responsibilities extend beyond initial engagement to include proper management of employee welfare. It affirms that courts will hold employers liable for procedural non-compliance, especially in health-related matters, reinforcing the legal and moral imperative to uphold workers’ rights.

Across these cases, the Court affirmed that employers must define, apply, and manage role expectations and employee welfare responsibilities consistently and in good faith. Procedural fairness, particularly in engagement and post-engagement scenarios such as health-related concerns, plays a decisive role in shaping outcomes in labor disputes.

Under the theme “Capacity to Dismiss – Disciplinary Action,” each reflecting the limitations and responsibilities tied to the employer’s disciplinary authority. In G.R. No. 211185, the Court ruled on a case involving dismissal for alleged concealment of information related to external construction activities. The employee had been placed on floating status pending investigation, but the Court found that the employer failed to provide substantial or convincing evidence of misconduct. The ruling emphasized that while employers have the right to discipline and dismiss, such authority must be exercised with fairness, supported by clear evidence, and implemented through structured procedures. The Court reinstated the employee, stating that mere allegations do not justify termination. This case illustrates that the employer’s disciplinary power is bounded by legal safeguards to prevent arbitrary or unsupported dismissals, and that procedural rigor is critical in shaping judicial outcomes in labor disputes.

Moreover, in G.R. No. 234186, the Court ruled on a case of constructive dismissal where the employee was suspended and later investigated for gross immorality after becoming pregnant out of wedlock. The disciplinary measures began with suspensions for absences without leave and escalated into charges rooted in moral judgment. The Court found that the employer’s actions were not only procedurally irregular but substantively discriminatory, using disciplinary mechanisms as a pretext for bias. The ruling upheld the decision in favor of the employee, affirming that the capacity to dismiss must be exercised within the bounds of fairness, legality, and respect for human dignity. This case illustrates the limits of employer disciplinary authority, particularly where actions intersect with gender-based discrimination, and reinforces the

judiciary's role in protecting workers from unjust treatment disguised as moral enforcement.

Lastly, in G.R. No. 218980, the Court reviewed a dismissal based on alleged theft and invoked loss of trust and confidence. The employer had issued show cause notices and placed the employees under preventive suspension during the internal investigation. However, the Court found that the accusations lacked substantial evidence and that the dismissal failed the standards of due process. Emphasizing that employer discretion must be grounded in good faith and verifiable proof, the Court reversed the dismissal. This case demonstrates that while employers may exercise disciplinary authority to safeguard business interests, such power must be supported by concrete evidence and exercised within legal bounds. When these safeguards are ignored, the judiciary intervenes to protect employee rights.

For the theme "Employer's Authority Over Work Methods and Practices," highlighting the scope and limits of managerial control in labor disputes. In G.R. No. 231111, the Court ruled in favor of an employee whose repeated medical requests were ignored by the employer, resulting in the award of permanent and total disability benefits. This ruling reversed earlier decisions and emphasized that employer authority includes the duty to support employee welfare, particularly in health-related matters.

In G.R. No. 245344, the Court addressed a constructive dismissal claim involving a bus driver disciplined for reckless driving. Although initially awarded separation pay, the Supreme Court reversed the appellate decision and ordered reinstatement, ruling that there was no substantial proof of strained relations. This case underscores that disciplinary authority must be based on fairness, not perceived behavioral issues alone.

Lastly, in G.R. No. 230682, the Court upheld that employees dismissed for alleged abandonment were entitled to statutory benefits, as no substantial evidence supported the employer's claim of abandonment. The Court reinforced that control over work assignments must be exercised in line with labor protections and proper documentation. Collectively, these cases affirm that while employers have broad authority to manage work, this power must be executed with fairness, legal compliance, and respect for employee rights.

Under the theme "Payment of Wages – Regular Payments," illustrating how wage consistency interacts with constructive dismissal, disability claims, and illegal dismissal. In G.R. No. 229881, the Court ruled in favor of an employee who, despite receiving a regular high salary and holding a managerial position, was coerced into resigning. The Court found this to be constructive dismissal, affirming that job security and fair treatment must accompany wage payment to constitute a valid employment relationship.

In G.R. No. 230473, the Court clarified the boundaries of employer obligations in a disability claim. While the seafarer was under a contract with clearly defined wage terms and benefits, the Court ruled that his illness was not work-related, and thus, the claim for additional compensation was denied. This case underscores the need for evidence linking illness to work to justify benefit claims, even in the presence of regular wage payments.

Lastly, in G.R. No. 202542, the Court found an employee's dismissal unlawful due to the absence of just cause and proper procedure. Although the employee received

Collectively, these cases affirm that while wage regularity is foundational to employment, it must be accompanied by procedural fairness, lawful termination practices, and clear benefit entitlements to uphold employee rights.

4.3 Employment Practices

The findings revealed that three major categories of employment practices—Termination Practices, Discipline Practices, and Evaluation Practices—were the most prominent factors influencing the outcomes of labor disputes.

Word Cloud for Employment Practices Themes

- Demotion Practice-Performance and Behavioral-Based Demotion
- Discipline Practice-Formal Disciplinary Processes
- Discipline Practice-Reassignment and Transfer as Discipline
- Discipline Practice-Immediate and Reactive Disciplinary Actions
- Evaluation Practice-Disciplinary Evaluations
- Recruitment Practice-Agency and Contractual Recruitment
- Termination Practice-Procedural Compliance in Termination
- Termination Practice-Contractual Compliance and Employment Criteria
- Termination Practice-Permanent Disability and Medical Assessments
- Hiring Practice-Formal Processes
- Hiring Practice-Regularized and Flexible Hiring Practices
- Recruitment Practice-Targeted Recruitment
- Termination Practice-Reparation and Medical Disputes
- Discipline Practice-Shared and Collaborative Discipline
- Termination Practice-Compulsory Retirement
- Termination Practice-Organizational Restructuring and Downsizing
- Termination Practice-Floating Status and Indefinite Suspension
- Recruitment Practice-Structured and Regulated Processes
- Termination Practice-Procedural Compliance and Disciplinary Process
- Evaluation Practice-Medical Evaluations and Assessments
- Hiring Practice-Structured and Formalized Hiring Practices

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In Figure 6.1 : Composition of Themes Across Labor Disputes visualizes how 85 themes align with specific case types like Constructive Dismissal or Disability Claims.

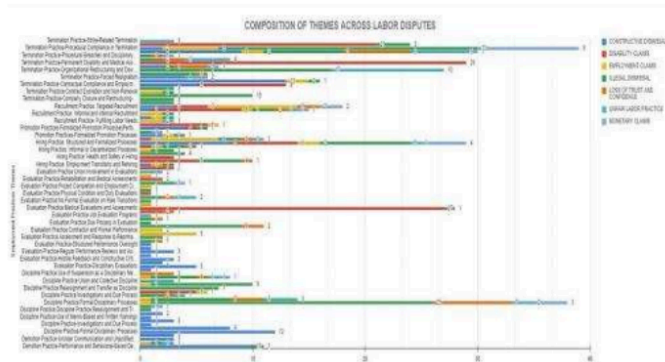


Figure 6.1 Composition of Themes Across Labor Disputes

Also, Figure 6.2 : Themes Co-Occurrence of Employment Practices and Labor Disputes shows how Termination and Evaluation practices co-occur with multiple dispute types.

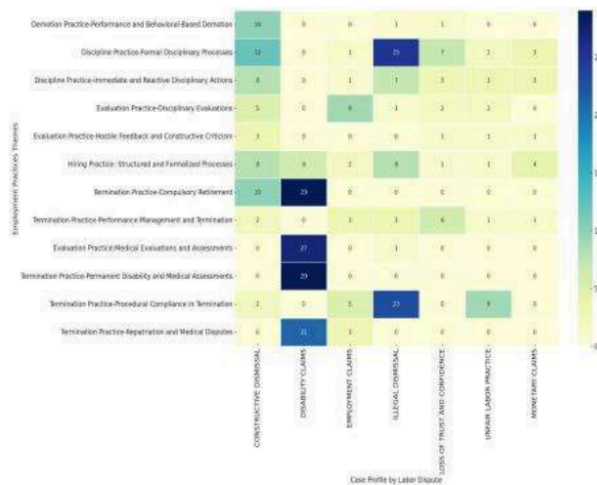


Figure 6.2 Themes Co-Occurrence Employment Practices and Labor Dispute

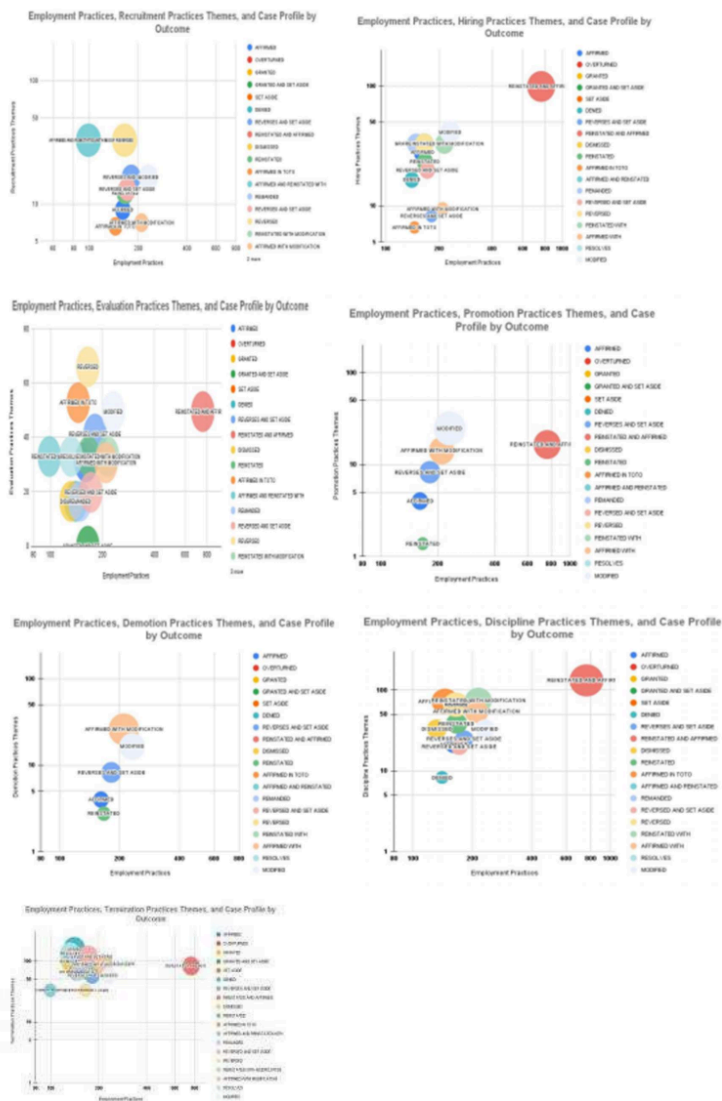


Figure 8 Relationship of Employment Practices Key Themes and Labor Cases Outcome

Furthermore, Figures 8 : Bubble Charts show the relationship between specific practices (e.g., Hiring, Promotion, Discipline) and legal outcomes (“Affirmed,” “Modified,” etc.). These visualizations summarize key findings by highlighting which HR practices—such as procedural compliance in termination, performance-based promotions, and structured hiring—are most associated with favorable or unfavorable court decisions. Larger bubbles in the charts represent themes frequently leading to outcomes like “Affirmed” or “Reinstated and Affirmed,” suggesting that legally consistent and well-documented employment practices often result in positive legal resolutions.

The analysis confirms that Termination Practices, Discipline Practices, and Evaluation Practices are most prominent in shaping labor dispute outcomes, as highlighted in Figure 5. These were frequently linked to court rulings on Illegal Dismissal, Constructive Dismissal, Disability Claims, and Employment Claims. Figure 6.1 illustrates how 85 identified sub-themes intersect with labor dispute categories, revealing that procedural compliance, repatriation, and medical assessment themes are particularly decisive.

Figure 6.2 adds depth by mapping the co-occurrence of these practices across cases, reinforcing the legal importance of integrated, compliant HR procedures. Figures 8 show that employment practices like structured hiring, clear promotion criteria, and formal disciplinary hearings are associated with favorable rulings such as “Reinstated and Affirmed” or “Affirmed with Modification.”

4.3.1 Application of Themes in Jurisprudence

The application of key employment practice themes was demonstrated across several labor jurisprudence cases decided by the Philippine Supreme Court between 2016 and 2020. The dominant employment practices—Termination, Discipline, and Evaluation—directly influenced the outcomes of labor disputes

In G.R. No. 202676, the key theme was "Discipline Practice – Formal Disciplinary Processes." The legal issue at bar was constructive dismissal due to the exercise of management prerogatives. This case illustrates the implications of formal disciplinary processes on employee morale and perceptions of job security. Although the employer followed structured disciplinary procedures—such as issuing memos, conducting an administrative hearing, and lifting the suspension—the employee’s constructive dismissal claim was ultimately supported by the Court. The decision underscores the importance of not only adhering to formal procedures but also ensuring that these processes are effectively managed to prevent undue strain or ambiguity for employees.

This ruling highlights the need for employers to apply formal disciplinary processes in a manner that avoids inadvertently displacing employees. While the employer executed the necessary procedural steps, the subsequent handling of the employee—leaving them without a definitive role or account to return to—suggested a lack of follow-through on reinstating employment. Such handling created an atmosphere of job insecurity that supported the claim of constructive dismissal.

In GR No. 202676, the Court emphasizes that adherence to formal procedures alone does not shield employers from constructive dismissal claims. Rather, employers must ensure that these processes do not lead to outcomes where employees feel alienated or compelled to leave due to unclear assignments or roles. This case reinforces

the importance of integrating procedural compliance with substantive fairness, confirming that actions perceived as undermining an employee's role stability can result in legal repercussions.

In G.R. No. 234186, the key theme was "Discipline Practice – Formal Disciplinary Processes." The legal issue at bar was constructive dismissal due to pregnancy discrimination. This case addresses formal disciplinary processes in the context of allegations of constructive dismissal tied to pregnancy discrimination. The employer's actions involved issuing disciplinary notices and a suspension to the employee, followed by an ultimatum to either resign or face termination, based on her pregnancy out of wedlock. This approach highlights the procedural use of formal disciplinary processes but raises questions about fairness and anti-discrimination practices in disciplinary decisions.

Moreover, this case illustrates the importance of ensuring that formal disciplinary processes are implemented without discrimination or personal bias. The employer's use of structured disciplinary actions, including issuing memos and conducting a hearing, reflects adherence to formal procedures. However, these actions were found to lack substantial grounds as the disciplinary measures were based on the employee's pregnancy rather than her professional conduct. The Court's decision underscores that formal processes must also be fair and compliant with anti-discrimination laws.

The ruling reinforces that while formal disciplinary processes are vital, they should be free from prejudiced motives. In G.R. No. 234186, the Court ruled that the employee's pregnancy did not justify her dismissal and that using formal disciplinary processes to pressure an employee due to personal circumstances undermines legal protections against discrimination. This case highlights that structured disciplinary processes, when misused, can lead to unjust outcomes that conflict with employment laws focused on fair treatment and equity.

In G.R. No. 219430, the key theme was "Discipline Practice – Formal Disciplinary Processes." The legal issue at bar was illegal dismissal due to insubordination. This case underscores the importance of formal disciplinary processes in upholding procedural integrity while also ensuring that disciplinary actions are substantiated by justifiable grounds. The employer's approach involved issuing multiple warnings and directives, yet the Court found these measures insufficient to prove insubordination. The Court's decision highlights that structured processes, such as memo issuance and directives to report, should be combined with clear evidence of misconduct when determining termination.

In G.R. No. 219430, the ruling reinforces the principle that adherence to formal disciplinary processes does not alone justify termination. Instead, employers must ensure that these processes reflect legitimate grounds for dismissal, with disciplinary actions rooted in clear, substantiated justifications.

In G.R. No. 223485, the key theme was "Discipline Practice – Use of Memo-Based and Written Warnings." The legal issue at bar was illegal dismissal due to loss of trust and confidence. This case emphasizes the role of memo-based disciplinary practices in upholding procedural standards when addressing trust-related infractions. While the employer's use of a Show Cause Memo and administrative hearings aligned with formal procedures, the Court found that the due process was incomplete. The

decision underscores the need for employers to ensure that memo-based disciplinary actions are more than formalities; they must fully integrate into a transparent process that respects both procedural compliance and fairness.

The ruling highlights that while written warnings and memos are essential tools for documenting infractions, they should be part of a fair, thorough investigation. The employer's failure to fully align its process with its internal rules demonstrated a lack of procedural completeness, leading the Court to mandate nominal damages for the employee, even though the dismissal was ultimately upheld.

In summary, G.R. No. 223485 reinforces that memo-based disciplinary actions must go beyond documentation. Employers must ensure that these measures align with due process and reflect a genuine commitment to procedural integrity, balancing the need for disciplinary action with fairness and thoroughness.

In G.R. No. 230682, the key theme was "Discipline Practice – Immediate and Reactive Disciplinary Actions." The legal issue at bar was illegal dismissal and work abandonment. This case focuses on the disciplinary practice of immediate and reactive actions in response to perceived infractions. The employees were allegedly dismissed after inquiring about prevailing minimum wage rates. They contended that they were prohibited from returning to work without any stated justification, leading to claims of illegal dismissal. The case centers on whether the employer's immediate and unsubstantiated actions amounted to a constructive dismissal, as well as the procedural fairness of such reactive disciplinary measures.

Also, this case examines procedural compliance in disciplinary practices where immediate actions were taken following employees' inquiries about minimum wage rates, leading to their being barred from work without explanation. The Court found that such actions, lacking investigation or formal hearings, contributed to claims of illegal dismissal.

The ruling highlights that while employers can respond quickly to workplace issues, disciplinary actions should respect due process. In this case, the Court ordered the employees' reinstatement without back pay, emphasizing that disciplinary measures must be transparent, procedurally fair, and supported by clear communication. G.R. No. 230682 underscores the importance of balancing prompt disciplinary responses with adherence to due process to ensure fairness.

Across these cases, the Court consistently ruled that discipline must follow established due process, involve fair documentation, and be based on substantiated misconduct. Failure to meet these standards led to rulings in favor of employees, reinforcing the principle that fairness and transparency in disciplinary procedures are vital to lawful employment practices.

Termination Practices in labor disputes, covering four key themes: Permanent Disability and Medical Assessments, Misconduct and Unauthorized Activities, Procedural Compliance and Disciplinary Process, and Contract Expiration and Non-Renewal. These themes emerged from multiple jurisprudence cases where the Supreme Court evaluated whether termination was lawful and compliant with substantive and procedural due process.

In G.R. No. 198225, the key theme was "Termination Practice – Permanent Disability and Medical Assessments." This case centers on the termination practice

related to permanent disability and medical assessments, specifically concerning claims for death benefits due to a seafarer's alleged suicide. The legal issue at bar involved claims for death benefits. The employee's family filed a claim for benefits following the employee's death while working abroad. The employer contended that the death was due to suicide, as supported by multiple investigative reports and a death certificate, disqualifying it from compensation under the POEA-SEC.

This case illustrates the role of medical assessments and evidentiary standards in determining eligibility for death benefits under employment contracts. In evaluating disability and death claims, employers are required to provide substantial evidence to substantiate claims that a seafarer's death resulted from an excluded cause, such as suicide. The multiple investigative reports presented by the employer, including testimonies from the ship's personnel and an official death certificate, were critical in establishing the non-compensable nature of the death.

The ruling reinforces that employers must adhere to procedural due diligence and present clear, reliable evidence when challenging claims for death benefits on grounds of deliberate or self-inflicted injury. While the POEA-SEC provides a framework that generally favors the seafarer in employment disputes, it also mandates strict adherence to the terms regarding compensable causes of death. In this case, the employer successfully demonstrated compliance with these standards, leading the Court to deny the claim for benefits due to the findings of suicide.

In summary, G.R. No. 198225 underscores the importance of thorough medical assessments and substantial evidence when handling disability and death claims in seafaring contracts. Employers must ensure comprehensive documentation and credible evidence to substantiate claims of non-compensable causes, such as self-harm, to uphold procedural fairness and compliance with contractual obligations.

In G.R. No. 200405, the key theme was "Termination Practice – Procedural Compliance and Disciplinary Process." The legal issue at bar was constructive dismissal and abandonment. This case highlights the significance of procedural compliance in the disciplinary process as part of termination practices. The employer's decision to issue a show-cause memo, followed by a dismissal notice, adhered to procedural standards, but the manner in which these steps were perceived by the employee led to a dispute over the fairness and intent of his reassignment.

The Court noted that the disciplinary actions, including the employee's transfer to office duties and reduction in benefits, fell within the company's right to manage its workforce, provided they did not amount to undue punishment or constructive dismissal. The ruling underscores the necessity for employers to follow due process and ensure that any disciplinary actions are consistent with established policies and not perceived as demotions or unjust treatments.

In cases where the employment relationship becomes strained, the Court affirmed that separation pay may be a suitable remedy to conclude the employment relationship, even in the absence of clear grounds for reinstatement or abandonment. In conclusion, G.R. No. 200405 serves as a reminder that while companies have the discretion to enforce disciplinary measures, such actions must be balanced with procedural fairness. When reassignment or disciplinary measures cause tension within the employment relationship, separation pay can provide a just solution, preserving the

dignity of the employee while upholding the employer's right to enforce disciplinary standards.

In G.R. No. 218980, the key theme was "Termination Practice – Misconduct and Unauthorized Activities." The legal issue at bar was illegal dismissal due to alleged theft, loss of trust and confidence, and due process. This case underscores the importance of termination practices for misconduct and unauthorized activities within the framework of due process. The employer took steps to address the allegations of theft against the employees by issuing show-cause notices and conducting hearings, which demonstrated procedural compliance. However, the allegations of theft and breaches of trust were not substantiated by clear evidence, leading the NLRC and the Court of Appeals to initially rule in favor of the employees.

The Supreme Court's ruling emphasized the employer's prerogative to dismiss employees when trust is compromised, particularly when allegations involve serious misconduct. While procedural due process was followed, the lack of substantial evidence pointed to the challenge of balancing management's discretion to enforce discipline against the rights of employees to security of tenure. This case highlights that procedural adherence alone may not always justify dismissal; substantial evidence must support the allegations when the termination is based on serious misconduct.

In summary, G.R. No. 218980 illustrates the need for employers to substantiate allegations of misconduct with clear evidence, even when procedural due process is followed. Termination practices involving misconduct and breaches of trust must be grounded in both substantial evidence and adherence to due process to uphold fairness and avoid potential claims of illegal dismissal.

The employment practices in labor disputes by key themes under Evaluation Practices. The key themes identified include Structured Performance Oversight, Medical Evaluations and Assessments, and Disciplinary Evaluations. These themes were present across several types of labor disputes, including Constructive Dismissal, Illegal Dismissal, and claims tied to Poor Performance or Medical Unfitness.

In G.R. No. 244423, the key theme was "Evaluation Practice – Medical Evaluations and Assessments." The legal issue at bar was a claim for permanent disability benefits. This case emphasizes the critical role of medical evaluations and assessments in employment practices, particularly in determining disability claims. The employee underwent several documented medical evaluations, including a diagnosis of a serious spinal condition, yet the assessments provided by the employer's physician were incomplete. The employer's reluctance to facilitate a third-party evaluation highlighted a gap in ensuring a comprehensive disability assessment process.

The Court's decision underscores that medical evaluations should not only assess physical conditions but also take into account the long-term impact on an employee's ability to work. In this case, the continuous pain and lack of definitive treatment options made it clear that the employee was no longer fit for duty. This ruling reinforces the need for employers to facilitate thorough and impartial medical evaluations, particularly when assessing permanent disability claims, to ensure fair treatment and accurate benefit determinations.

In summary, G.R. No. 244423 highlights that employers must provide clear and comprehensive medical evaluations as part of their employment practices. Ensuring timely, objective, and thorough assessments is essential in supporting employees' health

claims and maintaining trust in the evaluation process, especially when claims for disability benefits are involved.

In G.R. No. 245344, the key theme was "Evaluation Practice – Disciplinary Evaluations." The legal issue at bar was constructive dismissal and claims for reinstatement or separation. This case underscores the role of disciplinary evaluations in employment practices, where the documentation of infractions and the application of penalties are critical for performance management. The employer responded to documented infractions with specific disciplinary measures, including warnings and suspensions, but escalated to termination without following its own procedural standards for lesser penalties.

The Court's decision emphasizes that while disciplinary evaluations are essential for ensuring policy adherence, they should aim to correct behavior rather than unduly penalize. In this case, the application of penalties was found to be inconsistent with the employer's policy options, which provided alternatives to termination. This ruling reinforces the importance of fair, documented, and policy-aligned disciplinary evaluations to address infractions without prematurely resorting to dismissal.

In summary, G.R. No. 245344 highlights that employers must ensure that disciplinary evaluations not only document infractions but also apply penalties proportionately and in accordance with company policies. This case serves as a reminder that the goal of disciplinary evaluations is to support behavior correction and performance improvement, avoiding actions that could lead to unnecessary or unjustified dismissals.

In G.R. No. 202676, the key theme was "Evaluation Practice – Structured Performance Oversight." The legal issue at bar was whether actions in suspending, transferring, and profiling constituted constructive dismissal or were legitimate management prerogatives. This case illustrates the role of structured performance oversight in employment disputes. The employer's decision to place the employee on "floating status" and require additional profiling before reassigning them deviated from standard evaluation practices. Structured performance oversight should ensure clear communication, role stability, and transparent processes. However, the prolonged suspension and conditions for reassignment created uncertainty and ambiguity regarding the employee's job security, which led to the perception of constructive dismissal.

The Court's decision highlights that while employers can manage performance and reassign employees, these actions must be based on clear, justified reasons. In this case, the lack of transparency and prolonged ambiguity undermined fair evaluation practices, supporting the claim of constructive dismissal. This case emphasizes the importance of maintaining clarity, fairness, and consistency in evaluation processes to avoid negatively affecting employee morale and job security.

These labor cases demonstrate how evaluation systems directly shape the outcomes of employment disputes. Courts consistently emphasized that performance or medical assessments must be anchored in objectivity, transparency, and due process. Vague, undocumented, or selectively applied evaluation practices often led to findings of constructive dismissal or illegal termination.

Collectively, these findings demonstrate that employment practices—when improperly documented, arbitrarily applied, or procedurally flawed—can significantly alter legal outcomes. These findings emphasize that legal outcomes are significantly

influenced by the organization's ability to implement compliant and fair HR systems. As such, the study recommends codifying lawful employment practices, standardizing termination, discipline, and evaluation procedures, and reinforcing fairness in promotion and demotion policies to mitigate risks and align HR operations with legal standards.

4.4 Political and Philosophical Composition of the Judicial Decision-Makers

This section presents the results of the thematic and content analysis conducted to address the third sub-question of the study:

SOP 3: What political and philosophical composition of the judicial decision-makers influenced the judicial rulings?

The analysis was guided by Braun and Clarke's (2006) thematic analysis model and Krippendorff's (2018) content analysis framework. A total of 108 Supreme Court labor jurisprudence cases decided between 2016 and 2020 were systematically reviewed and coded.

To answer this question, 108 Supreme Court labor jurisprudence cases (2016–2020) were reviewed and analyzed through a structured coding process. This section details the political and philosophical composition of the judicial decision-makers involved in the analyzed labor jurisprudence cases. By examining the political approaches of the Labor Arbiter, National Labor Relations Commission, Court of Appeals, and Supreme Court justices, as well as the legal philosophies of the Supreme Court justices, this analysis uncovers the underlying influences that shape judicial rulings. Insights into these factors provide a deeper understanding of how judicial perspectives impact labor law interpretations and contribute to the outcomes of labor disputes, guiding organizations in aligning their practices with judicial expectations. The analysis revealed multiple layers of themes reflecting specific political and philosophical compositions and decision-making tendencies of the justices. These themes were drawn from judicial reasoning, rulings, and decisions of the labor cases, classified into categories such as pro-management, pro-labor, and balanced political positions, and legal philosophies including legal realism, positivism, and pragmatism—critical influences shaping court decisions.

The thematic analysis identified two major parent categories influencing judicial decision-making: Political Composition and Philosophical Composition.

For Political Composition, the themes include Pro-Management, Pro-Labor, and Balanced or Mixed Approaches, with the theme description indicating their alignment with specific labor dispute tendencies and decision patterns. For Philosophical Composition, the themes include Legal Positivism, Legal Realism, Legal Pragmatism, Textualism, Constitutional Constructionism, and Legal Originalism, with each theme categorized under its respective parent code and analyzed according to how it influenced the interpretation, reasoning, and outcome of labor dispute rulings.

Political Composition : Figure 10 presents the theme cloud, which visually highlights the predominant themes identified in the analysis of labor jurisprudence documents. The size of each theme reflects its frequency of occurrence, with larger themes representing those more frequently present in judicial decisions. This visualization assists in understanding the political composition and judicial tendencies that have shaped labor-related rulings.

The thematic analysis revealed three key perspectives within judicial rulings: pro-management, pro-labor, and balanced or mixed approaches. Pro-management judicial rulings reflect a conservative or pro-business stance, emphasizing managerial

prerogatives, financial stability, and adherence to company policies. These themes, such as "Pro Management–LA Decision" and "Pro Management–SC Decision," appear prominently in the cloud, indicating a significant presence in the dataset.



Figure 10 Themes Cloud of the Political Composition of Judicial Decision-Makers

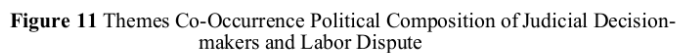
Pro-labor rulings, on the other hand, are associated with liberal or progressive judicial philosophies. These decisions focus on protecting workers' rights, ensuring procedural fairness, and addressing power imbalances between employers and employees. Themes such as "Pro Labor–SC Decision" appear larger in the cloud, demonstrating that a substantial number of rulings favor labor rights.

Finally, the balanced or mixed approach themes reflect judicial decisions that sought to carefully balance the interests of both management and labor. These rulings, represented by themes such as "Balanced Approach–SC Decision," suggest a centrist or pragmatic approach, where the judiciary aimed for equitable outcomes by considering the rights and responsibilities of both parties.

Political Composition and Labor Dispute Co-Occurrence : Figure 11, Themes Co-Occurrence: Political Composition of Judicial Decision-makers and Labor Dispute, provides a contextualized thematic analysis of how the political orientations of judicial decision-makers intersect with various types of labor disputes. The chart categorizes themes on the vertical dimension—such as "Pro-Management Judicial Rulings," "Pro-Labor Judicial Rulings," and "Balanced or Mixed Approach in Judicial Rulings"—which represent the political leanings derived from the rulings. These were identified through thematic-content analysis, where pro-management themes reflect conservative or pro-business stances, pro-labor themes reflect progressive orientations, and balanced themes indicate pragmatic decision-making that aims to weigh both sides fairly.

The horizontal axis categorizes the different types of labor disputes adjudicated by these judicial bodies, such as Constructive Dismissal, Disability Claims, Employment Claims, Illegal Dismissal, Loss of Trust and Confidence, Monetary Claims, and Unfair Labor Practice.

The "Balanced or Mixed Approach in Judicial Rulings" theme shows a more equitable distribution across various types of disputes, suggesting a careful consideration of both parties' interests in these decisions.



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The visualization reveals the frequency and influence of legal philosophies such as Legal Realism, Legal Positivism, Legal Pragmatism, Textualism, Constitutional Constructionism, and Legal Originalism.

Figure 12 provides a visual representation of the key legal philosophies prevalent in judicial rulings on labor disputes. The size of each term reflects the frequency of the philosophy's application in judicial decisions, revealing which legal principles were most influential in shaping outcomes.

The study aims to describe and analyze labor jurisprudence to inform the development of HR policies in organizations. By understanding the political and philosophical composition of judicial decision-makers, organizations can better anticipate how legal principles influence rulings, thereby refining their HR strategies to align with judicial expectations.



Figure 12 Themes Cloud of the Philosophical Composition of Judicial Decision-Makers

At the forefront of the theme cloud is Legal Realism, the most prominent philosophy. This suggests that judicial decision-makers frequently focus on practical realities and real-world impacts when making decisions. In labor disputes, this means the courts prioritize understanding the specific employment conditions, relationships, and broader workplace dynamics rather than relying on abstract legal theories.

Legal Positivism is another key influence in judicial decision-making. This philosophy is grounded in strict adherence to established laws and legal texts, indicating that courts often resolve cases by focusing on statutory requirements and precedent rather than moral or equitable considerations.

The presence of Legal Pragmatism in the cloud highlights the judiciary's concern with finding practical, flexible solutions that balance fairness with legal obligations. This approach reflects the court's willingness to modify rulings based on the specific context of each labor dispute, ensuring outcomes that are just and reasonable for both parties.

Textualism also plays a notable role, albeit less frequently. This philosophy centers on the literal interpretation of legal documents, with decisions based strictly on the wording of contracts and statutes. It suggests that, in some cases, courts give priority to the precise language used in laws and agreements, leaving little room for interpretation beyond the text.

Constitutional Constructionism indicates that judicial decision-makers also consider the broader constitutional principles in their rulings. This philosophy shows that courts sometimes prioritize fundamental rights and values, such as fairness and security of tenure, aligning legal outcomes with the intent of the Constitution.

While Originalism appears less frequently in the cloud, it reflects an approach where courts base their decisions on the original meaning of legal provisions at the time they were enacted. Though rare, this influence indicates that certain judicial rulings still adhere closely to historical legal interpretations.

Together, these philosophical orientations highlight the layered complexity in judicial reasoning, showing that legal outcomes in labor disputes are not only shaped by facts and statutes, but also by how justices frame legal meaning through interpretative lenses.

The content analysis of judicial decisions revealed how the legal philosophies of decision-makers influenced labor dispute outcomes. Through examination of selected case excerpts, the analysis demonstrated how different interpretative lenses—such as legal realism, positivism, pragmatism, and other frameworks—shaped judicial reasoning and the final rulings.

The analysis spans multiple industry sectors—distribution, management services, maritime employment services, manufacturing, telecommunication, food service solution—food and beverage service, transportation, container shipping services, hotel, financial services, education, banking, shipping, utilities, and healthcare—with the following key findings:

Legal Realism was evident in a diverse range of labor cases. Legal Realism was demonstrated in G.R. No. 224532, where the Court's consideration of both medical opinions reflected a contextual approach to disability claims in the maritime employment sector. This case resulted in reinstatement. Also, Legal Realism was demonstrated in G.R. No. 238347, where the court's decision was grounded in the practical realities of the case, focusing on the factual evidence. This ruling, which resulted in reinstatement, involved a loss of trust and confidence dispute in the container shipping services industry.

In G.R. No. 221199 Legal Realism was demonstrated, where the Court's reasoning reflected an understanding of the real-world impact on the petitioner's life and livelihood. The ruling was modified and related to a disability claim in the maritime employment services sector. Additionally, Legal Realism also appeared in G.R. No. 217455, where the Court emphasized the importance of ensuring that parties receive fair notice in the context of procedural due process. The decision reflected both Legal Realism and Legal Pragmatism—acknowledging the petitioner's claim of illegal dismissal while affirming with modification the employer's procedural missteps. This case arose from the hotel industry and underscored the value of fair process balanced with practical interpretation of employment expectations.

Legal Realism was further reflected in G.R. No. 226103, where the Court focused on procedural correctness and practical outcomes in a disability claim involving

maritime employment services. The decision affirmed the lower court ruling. Moreover, in G.R. No. 229881, which involved a constructive dismissal case in the financial services industry, the Court reinstated the employee with modification, interpreting constructive dismissal in light of real-life workplace dynamics. Lastly, in G.R. 237246, the Court reinstated the petitioner in a case concerning illegal dismissal in the food and beverage service industry, applying a practical and realistic standard to determine whether the NLRC's findings were supported by substantial evidence.

These rulings spanned industries such as maritime, manufacturing, hotel, food service, and healthcare. The GR Numbers associated with Legal Realism—such as 224532, 238347, 221199, 217455, 226103, 229881, and 237246—illustrate recurring themes of contextual fairness, procedural equity, and the practical realities of employment dynamics. In disability claims, the Court favored reinstatement or modified relief when equitable considerations outweighed procedural shortcomings. In constructive or illegal dismissal cases, judicial reasoning often leaned toward protecting livelihood and ensuring that procedural due process was meaningfully upheld. This confirms that Legal Realism plays a crucial role in shaping outcomes by interpreting facts and legal standards in light of their human and organizational impact, especially where vulnerable employment contexts and strained labor relations are evident.

Legal Positivism was strongly evident in G.R. No. 233314 (education), G.R. No. 219059 (utilities), G.R. No. 156635 (banking/strike case), and G.R. No. 229703 (telecommunication). These decisions emphasized statutory compliance and institutional policy adherence, generally favoring employers when procedures and contracts were followed. In G.R. No. 156635, the Court relied on the literal interpretation of strike procedures, while in G.R. No. 229703, the Court upheld termination based on written agreements and policies, indicating a clear application of legal positivist reasoning. G.R. No. 246760-61 (container shipping services) and G.R. No. 224319 (education) also echoed Legal Positivism through strict interpretations of classification, evidence, and procedural adherence, even as some judgments acknowledged humanitarian considerations.

Legal Positivism was strongly evident in G.R. No. 233314, where the Court applied established legal criteria by relying on the explicit text of the 2008 Manual of Regulations for Private Higher Education (MORPHE) and relevant case law. The ruling, which affirmed the decision, involved a constructive dismissal claim in the education sector and reflected Legal Positivism through its strict textual adherence. Also, G.R. No. 219059, where the Court emphasized adherence to established law and respect for procedural correctness. The ruling, which was affirmed in toto, addressed an illegal dismissal case in the electricity sector and exemplified Legal Positivism through its strict application of procedural and statutory requirements.

In G.R. No. 156635, where the Court emphasized adherence to procedural requirements in an unfair labor practice case. The decision, which was affirmed, exemplified Legal Positivism in the banking industry through its strict observance of labor code provisions and procedural correctness. Moreover, G.R. No. 229703, where the Court strictly applied established legal standards and denied damages, emphasizing procedural compliance while taking into account the factual context and evidentiary support. This case involved a loss of trust and confidence in the telecommunications sector and resulted in an affirmed ruling, aligning with the principles of Legal

Positivism. These decisions emphasized statutory compliance and institutional policy adherence, generally favoring employers when procedures and contracts were followed.

In G.R. No. 229703, the Court upheld termination based on written agreements and policies, reflecting a clear application of legal positivist reasoning. Lastly, G.R. No. 246760-61 involved an affirmed decision that declared the workers' dismissal illegal due to the absence of just or authorized cause under the labor code, aligning with strict adherence to statutory grounds.

Collectively, these cases demonstrate how Legal Positivism manifests in judicial emphasis on procedural correctness, textual adherence, and statutory interpretation. This cluster of rulings concludes the broader application of Legal Positivism in labor jurisprudence by illustrating how legal reasoning is firmly anchored in codified norms and formal processes, often favoring outcomes that prioritize institutional regularity and doctrinal consistency.

Legal Pragmatism was reflected in several cases where the Court emphasized flexible, context-sensitive reasoning to deliver fair and workable resolutions. In G.R. No. 200972, the Court granted separation pay instead of reinstatement, citing the employee's age and health as justifying a more compassionate outcome—highlighting the Court's responsiveness to the practical realities of labor relations. Also, in G.R. No. 214186, the Court reinstated the dismissed employee in a case of illegal dismissal, citing the need to balance the interests of both employer and employee. The ruling underscored that legal decisions must consider operational feasibility while ensuring fairness in labor relations.

Legal Pragmatism was also demonstrated in G.R. No. 236322 (management services), where the Court focused on the factual evidence presented and prioritized a clear and practical outcome. The decision involved an alleged constructive dismissal but ultimately reinstated the Labor Arbiter's ruling that the employee resigned voluntarily in light of fraud-related evidence and a separate criminal conviction. The ruling underscored the Court's intent to base its decision not on speculative claims but on substantiated records.

Legal Pragmatism was further reflected in G.R. No. 222430 (maritime employment services), where the Court emphasized the practical implications and fairness of the dismissal, considering the harshness of the penalty relative to the offense. The ruling affirmed with modification an illegal dismissal claim, citing that the employee's refusal to sign documents did not warrant the extreme penalty of termination. This decision illustrates the Court's pragmatic balancing of due process, proportionality of penalty, and contextual fairness.

Moreover, Legal Pragmatism was also exemplified in G.R. No. 224319 (education), where the Court acknowledged the constructive dismissal but disagreed with the Court of Appeals' ruling on the benefits awarded. The decision, affirmed with modification, accepted the division of probationary employment into multiple fixed-term contracts, reflecting a pragmatic understanding of academic employment practices. This case underscores the Court's willingness to apply legal standards flexibly to balance institutional norms with individual fairness. Lastly, Legal Pragmatism was also reflected in G.R. No. 227200 (food service solution, food and beverage service), where the Court ensured fair compensation and adherence to legal standards. The decision affirmed with modification an illegal dismissal claim and ordered wage differentials and interest computations based on clear violations of R.A. No. 6727. The Court grounded

its reasoning in the *Nacar v. Gallery Frames* precedent, applying applicable interest rates for delayed monetary awards.

In summary, the GR Numbers associated with Legal Pragmatism—such as 200972, 214186, 236322, 222430, 224319, and 227200—reflect a consistent judicial approach that values fair, practical outcomes within the bounds of legal obligations. The courts demonstrated a willingness to modify rulings, balance operational feasibility with worker rights, and apply equitable solutions in contexts such as dismissal penalties, contract flexibility, or delayed monetary compensation. Legal Pragmatism, as applied across these cases, affirms that labor adjudication is not rigidly legalistic but responsive to circumstance, focused on practical justice, and oriented toward sustainable employer-employee relations.

Textualism surfaced across several decisions where the Court strictly adhered to the plain language of statutes and contracts. In G.R. No. 233314 (education), the Court rejected the argument that agreeing to a tenure-by-default clause in the CBA constituted estoppel. Instead, it strictly enforced CHED Memorandum Order No. 40-08, emphasizing that any waiver of the requirement would be contrary to law. This reasoning reflected a Textualist approach through its emphasis on statutory adherence and rejection of implied waiver arguments.

Also, in G.R. No. 224319 (education), the Court's ruling emphasized the exact terms of the probationary contracts, noting that the employment relationship was divided into multiple fixed-term appointments rather than continuous tenure. The Court also focused on the structure of probationary employment contracts, emphasizing their fixed-term nature and explicitly rejecting arguments based on estoppel. It held that waiver of CHED Memorandum Order No. 40-08 would be contrary to law, reinforcing a Textualist reliance on statutory and contractual clarity over inferred intentions or labor policy generalizations.

Moreover, in G.R. No. 226103 (maritime employment services), where the Court adhered strictly to the explicit procedures outlined in the POEA-SEC. It emphasized the mandatory referral to a third physician in cases of conflicting medical assessments and noted the petitioner's failure to follow this process. The Court ruled that the employee's failure to comply with the prescribed procedure undermined the disability claim, affirming the ruling. This demonstrates a strong application of Textualism through procedural commitment. G.R. No. 237246 (food service) also reflected a plain-text approach in interpreting due process compliance and the sufficiency of evidence. The Court emphasized its obligation to evaluate the CA's decision from the lens of whether it correctly assessed the NLRC's actions for grave abuse of discretion. This approach highlights Textualism through procedural rigor and statutory interpretation, showing commitment to legal process over discretionary reinterpretation.

Lastly, in G.R. No. 2115225 (distribution), the ruling depended on the textual interpretation of resignation-related documents and relevant case law. The Court determined that the petitioner voluntarily resigned and emphasized that granting separation pay had no basis in law or jurisprudence. Citing the clear statutory framework and procedural context, the Court affirmed the CA's decision, strictly adhering to the legal text and principles—thereby demonstrating a clear application of Textualism.

The GR Numbers associated with Textualism—such as 233314, 224319, 226103, 237246, and 2115225—reveal how the Court consistently applied literal interpretations of statutory provisions, procedural rules, and contract language to resolve labor disputes. In cases involving resignation, disability claims, probationary employment, and procedural due process, justices grounded their reasoning in the clear and exact language of governing documents and legal frameworks. Whether by affirming dismissal decisions due to failure to follow POEA-SEC procedures or rejecting estoppel in favor of CHED regulations, these decisions exemplify how Textualism privileges clarity and doctrinal consistency over equitable or discretionary deviation. These rulings confirm that Textualism continues to shape labor jurisprudence where legal interpretation is centered on textual commitment.

Originalism appeared in G.R. No. 160090 (utilities-electricity), where the Court examined the calculation of backwages and the legality of dismissal through the lens of existing labor laws and established statutory procedures. The Court reaffirmed the Labor Code's standards for awarding separation pay and backwages, ruling that these must be computed strictly in line with prior rulings and statutory principles, such as in *Sara Lee Philippines v. Macatlang*. The Court also discussed the relaxation of procedural rules surrounding appeal bonds in cases where the final award was not yet settled. The decision demonstrates the application of Originalism by grounding its reasoning in the original legal frameworks and legislative intent underlying labor compensation rules and procedural safeguards.

Constitutional Constructionism was clearly invoked in G.R. No. 156635 (banking), where the Court addressed two central issues: the legality of a strike and the status of the petitioners' dismissal. It ruled that while the right to strike is constitutionally protected as a means to advance employment terms, such a right is not absolute and is subject to statutory conditions. The Court found that non-compliance with Article 263 of the Labor Code rendered the strike illegal. In doing so, it balanced labor rights with statutory restrictions, exemplifying Constitutional Constructionism by aligning labor law interpretation with constitutional guarantees while respecting statutory boundaries.

Liberal Interpretation was observed in G.R. No. 202308 (banking), where the Court affirmed in toto the employee's entitlement to GSIS Gratuity Pay. It rejected the employer's argument of unjust enrichment, emphasizing that social legislation—especially retirement laws—should be liberally construed in favor of workers. The Court reiterated that retirement statutes are humanitarian in nature and must be interpreted to ensure the retiree's security and dignity post-employment. This approach exemplified Liberal Interpretation by prioritizing the welfare objectives of the law and resolving ambiguities in favor of the retiree.

In summary, these rulings demonstrate that while less frequent than Realism or Positivism, philosophies such as Textualism, Originalism, Constructionism, and Liberal Interpretation continue to influence labor jurisprudence—particularly when disputes depended on strict legal interpretation, constitutional values, or equitable relief amid procedural gaps.

5. Discussion

This study interpreted how employment structures, labor conditions, HR policies, and labor jurisprudence shape the employee-employer dynamic. Findings revealed that court rulings, rooted in legal tests such as the four-fold and economic dependence test, significantly influence HR practices. Employment, labor standards, and HR policies are interconnected forces defining work relations (Lussier & Hendon, 2020; Labor Code of the Philippines, 2022; Merriam-Webster, 2022).

The analysis, grounded in Contextually Based Human Resource Theory (Paauwe, 2004) and Sustainable Development Goal 8 (UNDP, 2022), stressed the importance of fair employment practices aligned with sustainable economic growth.

Case Profile Patterns Most labor disputes (77.78%) originated in NCR, correlating with its dominant economic role. Regional disparities in access to labor justice remain, despite initiatives like DOLE inspections and the SEnA mechanism (DOLE, 2020; Philippine Development Plan, 2017–2022).

Individual labor disputes (62.96%) were more prevalent than collective actions, mirroring regional and global trends of personalized grievances involving illegal dismissals, constructive dismissal, and disability claims (International Labour Organization, 2021).

Disputes clustered heavily in Maritime Employment Services (22.22%) and Manufacturing (12.96%), sectors with high-risk employment conditions. Vulnerabilities in these sectors suggest the urgent need for stronger, industry-specific HR safeguards, in alignment with DOLE Department Orders 174-17, 198-18, and Executive Order 51 (DOLE, 2020).

Employee-Employer Relationship Themes

Control and Disciplinary Actions: The control test is critical. Courts favored employees when employers failed to substantiate disciplinary actions, as seen in GR No. 211185 and GR No. 218980. Due process and substantive fairness were emphasized (Alburo Alburo & Associates, 2021).

Capacity to Dismiss: Termination processes must align with legal standards. GR Nos. 211185 and 234186 illustrated that dismissals without due process were consistently overturned. The courts applied both the control and economic dependence tests (ILO Recommendation 198; Valeroso v. Sky Cable, G.R. No. 202015).

Payment of Wages: Wages signify economic dependence. Wage irregularities frequently triggered illegal dismissal claims, as in GR Nos. 229881, 230473, and 202542. Wage fairness emerged as a proxy for employment stability (Labor Law PH, 2024).

Selection and Engagement: Clear role definition is vital. Cases like GR Nos. 219430, 224319, and 238842 showed that courts ruled for employees when employers failed to define roles or mismanaged expectations.

Employment Practices Themes

Termination Practices: Procedural compliance, medical assessments, and contract expirations influenced outcomes. TSM Shipping v. De Chavez (G.R. No. 198225) and JS Unitrade v. Samson (G.R. No. 200405) confirmed that documentation, communication, and role stability are essential.

Discipline Practices: Formality, fairness, and proportionality were judicial priorities. Union School v. Dagdag (G.R. No. 234186) and Del Monte Land Transport v.

Abergos (G.R. No. 245344) emphasized correcting behavior over punitive dismissals (Armstrong & Taylor, 2020).

Evaluation Practices: Medical assessments and structured performance oversight were pivotal. *Rodelas v. MST Marine* (G.R. No. 244423) and *Telus v. De Guzman* (G.R. No. 202676) highlighted the importance of transparent, impartial evaluations.

Political and Philosophical Composition of Judicial Decision-Makers

Political Composition: Analysis revealed three judicial orientations—pro-labor, pro-management, and balanced. Pro-labor rulings dominated cases involving illegal dismissal and disability claims. Pro-management rulings were more common in loss of trust disputes. A balanced approach was evident in constructive dismissal cases (Panao, Xandra, & De Leon, 2018).

Philosophical Composition: Legal Realism (practical outcomes), Legal Positivism (statutory adherence), and Pragmatism (context-driven fairness) guided decisions. Cases like *Ang v. ICTSI* (G.R. No. 238347) and *Hernandez v. Magsaysay* (G.R. No. 226103) exemplified Legal Realism. Legal Positivism prevailed in *Agayan v. Kital* (G.R. No. 229703), while pragmatic solutions appeared in *Bulatao v. PNB* (G.R. No. 200972).

Findings showed that judicial emphasis on procedural due process, substantive fairness, clear employment practices, and philosophical pragmatism significantly influence labor dispute outcomes. Organizations must adopt legally compliant, transparent HR policies focused on: (1) Clear job roles and expectations (2) Structured and fair disciplinary procedures (3) Transparent wage systems (4) Rigorous termination and evaluation protocols

Aligning HR policies with the CBHR theory and SDG 8 fosters equitable, sustainable work environments and mitigates the risk of labor disputes. Labor jurisprudence thus provides a strategic foundation for HR policy development that balances business needs with workers' rights.

6. Conclusion

Drawing from the analysis of 108 labor jurisprudence cases, this study revealed that employee-employer relationships—particularly issues of control, disciplinary actions, payment of wages, and clarity in role engagement—significantly shaped court decisions. When employers failed to adhere to legal standards or maintain transparent, fair processes, courts often ruled in favor of employees, underscoring the importance of procedural compliance and equitable treatment. Conversely, well-documented disciplinary procedures, fair wage practices, and explicit job responsibilities tended to support the employer's position.

Furthermore, employment practices such as procedural compliance in termination, structured performance oversight, and fair disciplinary evaluations emerged as crucial determinants of judicial outcomes. Cases involving disability claims, illegal dismissal, and constructive dismissal highlighted that courts closely scrutinize the rigor and fairness of employers' termination and evaluation processes. Employers who demonstrated thorough documentation, objective medical or performance assessments, and transparent communication generally secured more favorable verdicts.

Lastly, the political and philosophical composition of judicial decision-makers—ranging from pro-labor to pro-management stances, and from legal realism to pragmatic interpretations—profoundly influenced labor rulings. While pro-labor rulings often

stressed anti-discrimination and job security, pro-management decisions underscored organizational stability and managerial prerogatives. Pragmatic judgments balanced fairness with flexibility, ensuring that rulings accounted for real-world workplace contexts and statutory requirements.

Overall, these findings underscore the imperative for organizations to develop HR policies grounded in fairness, transparency, and legal rigor, aligned with broader goals of promoting decent work and sustainable employment. Future research should explore jurisprudence at lower court levels, particularly decisions by Labor Arbiters and the National Labor Relations Commission (NLRC), to assess how early-stage labor dispute resolutions compare with Supreme Court trends. Moreover, studies may investigate post-pandemic shifts in labor jurisprudence and address regional disparities in access to labor justice, providing a deeper, more equitable understanding of evolving employment relations.

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7. References

- Alawamleh, K.J. (2022), "To what extent is arbitration acceptable in individual labor disputes? A critique from a Jordanian law perspective", *International Journal of Law and Management*, Vol. 64 No. 1, pp. 18-31. <https://doi.org/10.1108/IJLMA-12-2019-0279>
- Apalia, E. A. (2017). Effects of discipline management on employee performance in an organization: The case of county education office human resource department, Turkana County. *International Academic Journal of Human Resource and Business Administration*, 2(3), 1-18.
- Azucena, C. A. (2013). *The Labor Code: with Comments and Cases* (Vol. 1). National Book Store. <https://www.rexestore.com/labor-standards/981-the-labor-code-with-comments-and-cases-volume-i-revised-edition.html>.
- Armstrong, M., & Taylor, S. (2020). *Armstrong's Handbook of Human Resource Management Practice* (15th ed.). Kogan Page.
- Archibong, U., Kline, R., Eshareturi, C., & McIntosh, B. (2019). Disproportionality in NHS Disciplinary Proceedings. *British Journal of Healthcare Management*, 25(4), 1-8. <https://doi.org/10.12968/bjhc.2018.0062>

- B.Lowry, D.LeClerc,R.Chambre,G.Brierley,E.Smith. (2022, June 27–30). the 2nd Annual Global Trade Week [Virtual session Debate: How to eradicate forced labour in global]. the 2nd Annual Global Trade Week, Virtual and London, London.
- Bapuji, H., Patel, C., Ertug, G., & Allen, D. G. (2020). Corona crisis and inequality: Why management research needs a societal turn. *Journal of Management*, 46(7), 1205-1222
- Braun, Virginia; Clarke, Victoria (2006). "Using thematic analysis in psychology". *Qualitative Research in Psychology*. 3 (2): 77–doi:10.1191/1478088706qp063oa
- Book III – Conditions of Employment | Bureau of Labor Relations (dole.gov.ph)
- Caesar, L. D. (2023). Emerging Dynamics of Training, Recruiting and Retaining a Sustainable Maritime Workforce: A Skill Resilience Framework. *Sustainability*, 16(1), 239. <https://doi.org/10.3390/su16010239>
- Calabrese, S. G. (n.d.). On Originalism in Constitutional Interpretation. Retrieved from www.constitutioncenter.org
- Clayton CW, Gillman H (eds) (1999) *Supreme Court Decision-making: New Institutional Approaches*. University of Chicago Press, Chicago.
- Campbell, J. L., Osseman, J., Pedersen, O.K., Quincy, C. (2013). Coding In-Depth Semistructured Interviews: Problems of Unitization and Inter-coder Reliability and Agreement. *Social Methods & Research*, 42(3), 294-320
- Carter, T., Bell, S., Horneland, A. M., & Idnani, S. (2017). Standards for quality assurance of pre-employment medical examinations of seafarers: the IMHA Quality experience. *International Maritime Health*, 68(2), 99–101. DOI: 10.5603/IMH.2018.0019
- Chai, J. X., Ismail, F., & Khan, M. A. (2022). Employee Discipline Management: How to Pursue Disciplinary Actions Effectively and Legally in The Workplaces. *Journal of Techno Social*, 14(1), 1-5. <https://doi.org/10.30880/jts.2022.14.01.001>
- Choi, J., Lim, S., & Lee, C. (2023). Comparative Analysis of Sustainable Seafarers' Employment and Welfare Systems in South Korea and China: Contemporary Issues and Improvements. *Sustainability*, 16(19), 8512. <https://doi.org/10.3390/su16198512>
- Creswell, J. W., & Poth, C. N. (2013). *Qualitative inquiry and research design: Choosing among five approaches* (4th ed.). Sage Publications.
- Corlett,Angelo J. (2009). Constitutional Constructionism. In: *Race, Rights, and Justice. Law and Philosophy Library*, vol 85. Springer, Dordrecht. https://doi.org/10.1007/978-1-4020-9652-5_3
- Dacanay, J., & Walters, D. (2011). Protecting precarious workers in the global maritime industry: A case of regulatory failure?
- Delve, Ho, L., & Limpacher, A. (2023c, February 15). Content Analysis vs Thematic Analysis: What's the Difference? <https://delvetool.com/blog/content-analysis-vs-thematic-analysis>
- Department of Labor and Employment. (2020). DOLE performance 2016-2020.
- Desrieux, C., & Espinosa, R. Case Selection and Judicial Decision-Making: Evidence from French Labor Courts. *European Journal of Law and Economics*, Springer Verlag, 2018, 47 (1), pp.57- 58. Retrieved November 2019, from <https://halshs.archives-ouvertes.fr/halshs-01827472/document>

- Doori Song, Judicial Pragmatism: Strengths and Weaknesses in Common Law Adjudication, Legislative Interpretation, and Constitutional Interpretation, 52 UIC J. Marshall L. Rev. 369 (2019)
- Elliott, R., & Timulak, L. (2021). Why a generic approach to descriptive-interpretive qualitative research? In R. Elliott & L. Timulak, *Essentials of descriptive-interpretive qualitative research: A generic approach* (pp. 3–14). American Psychological Association. <https://doi.org/10.1037/0000224-001>
- Elton Mayo. (1933). *the human problems of an industrialized civilization. The Human Problems of an Industrialized Civilization.*
- E-Justice and Fundamental Rights International GesbR. (2023). *Issues Affecting the Consistency of Judicial Decisions and Best Practices in Securing Consistency in Judicial Decision Making.* Council of Europe.
- Epstein L, Knight J (1998). *The Choices Justices Make.* CQ Press, Washington, DC.
- Exon, S. C. (2023). *Exploring Informality in Relation to Disciplinary Disproportionality of Black, Asian and Minority Ethnic Employees* (Doctoral dissertation, University of York). Retrieved from <https://etheses.whiterose.ac.uk/>
- Ferrera, G. R., & Alexander, M. (2011). Appellate judges and philosophical theories: Judicial philosophy or mere coincidence? *Richmond Journal of Law and the Public Interest*, 14(4), 561-591.
- Gianfreda, G.Vallanti. (2020). Labor Courts and Firing Costs: The Labor-Market Effects of Trial Delays. *Journal of Industrial Relations.* <https://doi.org/10.1111/irel.12250>
- Government of Canada. (2020). *Determining the employer/employee relationship - IPG-069.*<https://www.canada.ca/en/employment-social-development/services/labour-standards/reports/ipg-069.html>
- Guest, D. (1987). Human resource management and industrial relations. *Journal of Management Studies*, 24(5), 503–521. <https://doi.org/10.1111/j.1467-6486.1987.tb00460.x>
- G.R. No. 202015, July 13, 2016 - Antonio Valeroso and Allan Legatona, Petitioners, v. SKYCABLE Corporation Respondent. Philippine Supreme Court Decisions
- GR. No. 81958 June, 1988 - Philippine Association of Service Exporter, Inc. v. Secretary of Labor and Employment
- Hatten, T. S. (2012). *Small Business Management: Entrepreneurship and Beyond* (5th ed.). Cengage Learning.
- Hall, Mark A. and Wright, Ronald F., *Systematic Content Analysis of Judicial Opinions* (June 30, 2006). Wake Forest Univ. Legal Studies Paper No. 913336, California Law Review, Vol. 96, 2008, 1st Annual Conference on Empirical Legal Studies Paper, Available at SSRN: <https://ssrn.com/abstract=913336>
- He, Xin, Yang Su Flexibility and Authority: Resolving Labor Disputes in a County Government in Western China (June 27, 2018). *Journal of Law and Society Review/University of Hong Kong Faculty of Law Research / Paper No. 2020/031*, <https://doi.org/10.1111/lasr.12443>
- Hendry, C., & Pettigrew, A. (1990). Human resource management: An agenda for the 1990s. *International Journal of Human Resource Management*, 1(1), 17–43. <https://doi.org/10.1080/09585199000000038>

- Henri Fraisse, Francis Kramarz, Corinne Prost. (2022). Labor Disputes and Labor Flows IZA Discussion Paper No. 5677. The Institute for the Study of Labor (IZA). <https://d-nb.info/1011872102/34>
- Hong, Z., Guan, J. (2021). The key to system performance lies in implementation: empirical evidence from labor dispute data of Shanghai from 1918 to 1940. *Journal of Applied Economics*. <https://doi.org/10.1080/15140326.2021.1896320>
- How is Employer-Employee Relationship Determined? (2022). <https://www.alburolaw.com/>. <https://www.alburolaw.com/how-is-employer-employee-relationship-determined>
- <https://www.law.cornell.edu/wex/textualism>
- <https://iep.utm.edu/leglprag/>
- https://www.law.cornell.edu/wex/legal_realism/lega_formalism
- Human Development Report. (2019). Beyond income, beyond averages, beyond today: Inequalities in human development in the 21st century. Copyright © 2019 By the United Nations Development Programme. 1 UN Plaza, New York, NY 10017 USA.
- International Labour Organization. (2003). Employment Relationship. https://ilo.orghttps://ilo.org/ifpdial/areas-of-work/labour-law/WCMS_CON_TXT_IFPDIAL_EMPREL_EN/lang-en/index.htm#:~:text=Employment%20Relationship%20,Employment%20Relationship,-The%20employment%20relationship
- International Labour Organization. (2021). Access to labour justice: Judicial institutions and procedures in selected Asian & Pacific countries. ILO.
- ILO and Asian Research Center for Migration at Chulalongkorn University's Institute of Asian Studies. (2014, February). Employment practices and working conditions in Thailand's fishing sector (9789221277972 (web pdf)[ISBN]). ILO in Asia and the Pacific. https://www.ilo.org/asia/publications/WCMS_220596/lang-en/index.htm
- International Labour Organization, Governance and Tripartism Department. (2013, April). Labour Dispute Systems: Guidelines for improved performance (No. 978-92-9049-677[ISBN]). ILO. https://www.ilo.org/ifpdial/information-resources/publications/WCMS_211468/lang-en/index.htm
- International Labour Organization. (2021). The response of labour dispute resolution mechanisms to the COVID-19 pandemic (ISBN 978-92-2-035941-9 (web PDF)). ILO Publications. <https://www.ilo.org/publns>
- International Labour Organization. (2010). Strategic Policy Framework 2010-15: Making Decent Work Happen. Retrieved from https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_norm/@relco/nf/documents/meetingdocument/wcms_102572.pdf
- Jimenez, J. B. Atty., Why do many employers often lose their labor cases?: Retrieved November 2019 from <https://www.philstar.com/freeman/opinion/2018/09/12/>
- Jurisprudence. (2022). Legal Information Institute Cornell Law School. <https://www.law.cornell.edu/wex/jurisprudence>
- Karkkainen, B. (1994). "Plain meaning": Justice Scalia's jurisprudence of strict statutory construction. *Harvard Journal of Law and Public Policy*, 17(2),

401. <https://www.proquest.com/scholarly-journals/plain-meaning-justice-scalias-jurisprudence/docview/235201733/se-2>
- Krippendorff, K. (2013). *Content analysis: An introduction to its methodology*. Sage publications.
- Labor Law PH. (2024). The four-fold test in determining employer-employee relationship. Labor Law PH.
- Lewis, L. K. (2019). *Organizational Change: Creating Change Through Strategic Communication*. John Wiley & Sons.
- Llewellyn, K. N. (1960). *The Bramble Bush: On Our Law and Its Study*. New York: Oceana Publications.
- Lussier, R. N., & Hendon, J. R. (2020). *Fundamentals of human resource management: Functions, applications, and skill development* (2nd ed.). Los Angeles: SAGE Publications, Inc.
- Magna Carta, the Rule of Law, and the U.S. Constitution. <https://iaals.du.edu/blog/magna-carta-rule-law-and-us-constitution>
- Mañko, R. Judicial Decision-Making, Ideology and the Political: Towards an Agonistic Theory of Adjudication. *Law Critique* 33, 175–194 (2022). <https://doi.org/10.1007/s10978-021-09288-w>
- Mone, E. M., & London, M. (2018). *Employee Engagement Through Effective Performance Management: A Practical Guide for Managers* (2nd ed.). Routledge.
- Neuendorf, K. A. (2017). *The content analysis guidebook* 2nd Edition. Sage publications.
- National Labor Relations Commission (NLRB). (2019). En Banc Resolution No. 02-19 (Series of 2019).
- National Labor Relations Commission (NLRB). (2023). En Banc Resolution No. 05-23 (Series of 2023).
- Neale, N. R., Butterfield, K. D., Goodstein, J., & Tripp, T. M. (2020). Managers' restorative versus punitive responses to employee wrongdoing: A qualitative investigation. *JBE. Journal of Business Ethics*, 161(3), 603-625. doi:<https://doi.org/10.1007/s10551-018-3935-x>
- NLRB v. Jones & Laughlin Steel Corp. - https://scholar.google.com/scholar_case?case=10553454701062806540
- Nyarkoh, S.K., Attah-Gyamfi, G., Akumbuno, A., Akuna, E., Awandare, F. A., Mensah, G., Linda, C. W. and Kissi-Abrokwa, B. (2023). Impact of work-related disciplinary regulation on university staff performance. *Social Science Archives*, Vol. 1(4), 76-87. <https://doi.org/10.47587/SSA.2023.1401>
- Okolie, U. C., & Udom, I. D. (2019). Disciplinary Actions and Procedures at Workplace: The Role of HR Managers. *Journal of Economics & Management Research*, (8).
- Paaauwe. (2004). Contextually based human resource theory. *Contextually Based Human Resource Theory*.
- Paaauwe. (2004b). HRM and Performance Achieving Long Term Viability. Oxford University Paaauwe, J. (2004). HRM and performance: Achieving long-term viability. *Human Resource Management Journal*, 14(2), 21–41.Press.
- Palinkas, L. A., Horwitz, S. M., Green, C. A., Wisdom, J. P., Duan, N., & Hoagwood, K. (2015). Purposeful Sampling for Qualitative Data Collection and Analysis in

- Mixed Method Implementation Research. *Administration and Policy in Mental Health and Mental Health Services Research*, 42(5), 533-544. <https://doi.org/10.1007/s10488-013-0528-y>
- Panao, Rogelio Alicor & Panao, L. & Xandra, Bea & Leon, De. (2018). Balancing the interests of labor and capital: an empirical analysis of Philippine Supreme Court labor cases from 1987 to 2016. *Philippine political science journal*. 39. 10.1080/01154451.2018.1498606.
- Pangalangan, Raul C., ed. (March 2001). "The Philippine Judicial System." *Asian Law Series*. Institute of Developing Economies.
- Philippine Development Plan 2017-2022. (2017). National Economic and Development Authority (NEDA).
- Philippine Statistics Authority (PSA). (2023). *Regional Social and Economic Trends*, NCR.
- Posner, R. A. (2008). *How Judges Think*. Cambridge, MA: Harvard University Press.
- Republic of the Philippines Supreme Court E-Library <https://elibrary.judiciary.gov.ph/>
- Saldaña, J. (2015). *The coding manual for qualitative researchers*. Sage. DOI: 10.1108/QROM-08-2016-1408
- Saunders, M., Lewis, P., & Thornhill, A. (2009). *Research Methods for Business Students*. Pearson Education Limited.
- Segal, J., & Spaeth, H. (2002). *The Supreme Court and the Attitudinal Model Revisited*. Cambridge: Cambridge University Press. doi:10.1017/CBO9780511615696
- Shah, B., Andrioti, D., & Jensen, O. C. (2018). Training needs among maritime professionals: A cross-sectional study. *International Maritime Health*, 69(2), 129–136. DOI: 10.5603/IMH.2018.0019
- Supreme Court of the Philippines. (2019). *Telus International Philippines, Inc. and Michael Sy vs. Harvey De Guzman* [G.R. No. 202676, December 04, 2019]. Retrieved from <http://sc.judiciary.gov.ph/>
- Supreme Court of the Philippines. (2020). *Roberto F. Rodelas, Jr. vs. MST Marine Services (Phils.), Inc.* [G.R. No. 244423, November 04, 2020]. Retrieved from <http://sc.judiciary.gov.ph/>
- The World Justice Project Rule of Law Index 2021 (ISBN 978-0-9964094-6-9). (2021). World Justice Project. <https://worldjusticeproject.org/>
- Trochim, W. M. (2006). Reliability. Retrieved December 21, 2016, from <http://www.socialresearchmethods.net/kb/reliable.php>
- Wang & F.Cooke. (2021). Internet Platform Employment in China: Legal Challenges and Implications for Gig Workers through the Lens of Court Decisions. *Journal of Relations Industrielles/Industrial Relations*. <https://doi.org/10.7202/1083612ar>
- United Nations Sustainable Development Goals <https://sdgs.un.org/goals>
- United Nations. (2015). *Transforming our world: The 2030 agenda for sustainable development*. <https://sustainabledevelopment.un.org/post2015/transformingourworld>
- United Nations. (2015.). *Goal 8: Decent Work and Economic Growth*. United Nations Sustainable Development Goals. <https://sdgs.un.org/goals/goal8>.
- U.S. Department of Labor, Wage and Hour Division. (2024, March). *Fact Sheet 13: Employee or independent contractor classification under the Fair Labor Standards Act (FLSA)* [Fact sheet]. U.S. Department of Labor. <https://www.dol.gov/agencies/whd/flsa/factsheet-13>

West, Robin. Normative Jurisprudence : An Introduction, Cambridge University Press, 2011. ProQuest Ebook Central, <http://ebookcentral.proquest.com/lib/dadiangas-ebooks/detail.action?docID=775152>. Created from dadiangas-ebooks on 2022-07-22 05:09:44.

www.pna.gov.ph. (2021). 82% of labor disputes in E. Visayas settled last year. <https://www.atinitonews.com/2022/02/82-of-Labor-Disputes-in-e-Visayas-Settled-Last-Year/>. <https://www.atinitonews.com/2022/02/82-of-labor-disputes-in-e-visayas-settled-last-year/>

9. Appendices

Appendix A

A Proposed HR Policy Framework

Title: Evidence-Informed, Contextualized, and Justice-Oriented HR Policy Framework (ECJ Framework)

I. Introduction

This HR policy framework is grounded in the descriptive-interpretative qualitative analysis of 108 Philippine Supreme Court labor jurisprudence cases (2016–2020), analyzed through thematic and content analysis using Braun & Clarke (2006) and Krippendorff (2018). It is built upon the Contextually Based Human Resource Theory (Paauwe, 2004) and aligned with the United Nations SDG 8 (Decent Work and Economic Growth).

II. Core Pillars of the Evidence-Informed, Contextualized, and Justice-Oriented (ECJ) HR Policy Framework

1. Employee-Employer Relationship Integrity Policy Guidance:

Ensure that all employment relationships are built not only on written contracts but also on clear, lawful, and equitable employment practices. Strengthen clarity of roles, ensure just cause in dismissals, uphold wage obligations, and respect employee dependence on continued employment.

Derived from Employee-Employer Relationships Findings:

- ✓ Labor disputes frequently stemmed from failures to observe fairness in work assignments, disciplinary actions, and wage practices.
- ✓ The Court applied the four-fold test and economic dependence principles to assess the genuineness of employer control and obligation.
- ✓ The judiciary emphasized that substantive fairness—not just formal agreements—determines the legitimacy of employment relationships.
- ✓ When employers neglected to define duties, follow just cause procedures, or failed wage compliance, the decisions leaned toward employee protection.

Evidence-Informed, Contextualized, and Justice-Oriented HR Policy Framework Diagram- ECJ HR Policy Framework

This diagram illustrates the flow of the proposed HR Policy Framework, showing how labor jurisprudence insights are translated into policy direction and actionable HR strategies:



Figure 12. The Proposed HR Policy Framework

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