

IN THE FAMILY JUSTICE COURTS OF THE REPUBLIC OF SINGAPORE
[2026] SGFC 74

FC/D 2717 of 2024 (FC/SUM 1152 of 2026)

Between

YDQ

... Applicant

And

YDR

... Respondent

JUDGMENT:
CHILDREN'S CHURCH CAMP

***Family Law** – Whether court should make coercive order compelling one parent to facilitate children's participation in church camp over another parent's objection – Applicable considerations*

***Family Law** – Coercive orders in parenting disputes – Judicial restraint – Court as last resort in resolving parenting disputes*

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YDQ

v

YDR

[2026] SGFC 74

FC/D 2717 of 2024 (FC/SUM 1152 of 2026)

District Judge Kow Keng Siong
15 and 26 May 2026

26 May 2026

District Judge Kow Keng Siong:

Introduction

1 This application arises from a dispute between estranged parents over whether their children should attend a church camp (“**Camp**”). The Father seeks an order compelling the Mother (a) to ensure that their two children attend the Camp, (b) to “personally transport” them to and from the Camp daily during the four-day event, and (c) to bear half of the registration fees and ancillary costs of the Camp: FC/SUM 1152 of 2026 (“**SUM 1152**”). The Mother opposes the application.

2 On one level, SUM 1152 involves a narrow parenting disagreement about a single event. On another, it engages a deeper question about the Court’s

role in parenting disputes involving matters of religion. Is it appropriate for a parent to use the coercive powers of the Court to compel his children's participation in a religious activity over the other parent's objection? And should the Court pass judgment on which parent's religious preference for the children is the correct one?

Background

3 These issues arise against the following backdrop.

(a) ***The parties.*** The parties have obtained interim judgment for divorce in January 2025. The date for the ancillary matters hearing has not been fixed yet because of various applications filed by the Father.

(b) ***The children.*** The parties have a son (born in March 2016) and a daughter (born in August 2017). It is not disputed that the children are baptised and enrolled in Christian schools. It is also not disputed that the parties have joint custody over the children, with the Mother having care and control over them.

(c) ***The Camp.*** The Camp aims to build courage, faith, and character in young children grounded in the Bible, and incorporates scripture-based learning through art, drama and play. The son had attended a similar camp in 2022.

The parties' case

Father's reasons for SUM 1152

4 The Father's reasons for filing SUM 1152 are as follows.

(a) *Children's best interests.* The children will benefit from attending the Camp. It (i) supports their religious development, (ii) instils in them courage, faith and resilience (values which are especially important during the present difficult period of the family), (iii) provides wholesome activities that benefit their creative and physical development, and (iv) allows them to build friendship and a sense of belonging with a structured Christian environment.¹

(b) *Mother's alleged obstruction.* Since May 2024, the Mother has demonstrated a consistent pattern of obstructing the formation of the Christian faith in the children by failing to bring them to various Christian activities. She feels entitled to decide whether the children should participate in such activities. Given this, the Father has "reasonable grounds to apprehend that [she] will withhold her consent" to the children's participation in the Camp unless the Court makes a specific and enforceable order".²

(c) *Joint custody issue.* The Mother's position towards the children's religious upbringing is "irreconcilable" with the Father's right of joint custody.³

(d) *Costs consideration.* Further, the Father had already paid the children's registration fees (\$370) at the Camp. These fees would be wasted if SUM 1152 is denied.⁴

¹ Father's written submissions dated 06.05.26 at [4(a)] and [13] to [15].

² Father's affidavit dated 05.05.26 at [11] and [12]; Father's written submissions dated 06.05.26 at [7].

³ Father's affidavit dated 05.05.26 at [15]; Father's written submissions dated 06.05.26 at [10] to [12].

⁴ Father's written submissions dated 06.05.26 at [16].

Mother's response

5 The Mother opposes SUM 1152 for the following reasons.

(a) *Allegations of Mother's obstruction.* She denies obstructing the formation of Christian faith by the children. She did not bring them to attend some of the Christian activities because of their school schedule.⁵

(b) *Care and control issue.* The children's attendance at the Camp involves a "scheduling decision" that falls within the Mother's authority as the parent with care and control. A court order compelling her to personally transport the children to and from the Camp each day would be "oppressive and unreasonable". The Courts adopt a restrained approach in matters involving day-to-day parenting and will intervene only where the child's welfare is at risk. In this case, there is no evidence that absence from the Camp would adversely affect the children's welfare. It is optional and not integral to their development.⁶

(c) *Custody issue.* Alternatively, if the matter is characterised as a custody issue, then as a parent having joint custody rights, the Mother's agreement is required before the children can be enrolled in the Camp. The Father cannot unilaterally decide on the issue and compel her to send them there. Her decision not to enrol the children does not undermine the Father's custody right – the Camp is a single event confined to only four days and he is not prevented from exposing the children to Christianity generally as this is provided in their consent

⁵ Mother's affidavit dated 13.05.26 at [8].

⁶ Mother's affidavit dated 13.05.26 at [10] to [12]; Mother's written submissions dated 13.05.26 at [13] to [17], [22] to [24] and [27(a)].

order dated 2 February 2026: FC/ORC 876 of 2026 (“**Consent Order**”).⁷

(d) *Children’s emotional state and wishes.* Finally, and importantly, she is concerned about the son’s emotional state. He has recently expressed suicidal ideation and is under active counselling by two entities. The child had told her that he felt stressed about attending the Camp. In the circumstances, she feels that compelling the son to attend the four-day camp would be seriously detrimental to his mental health. The daughter has also told her that she is reluctant to attend the Camp.⁸

Preliminary comments

6 Before addressing the merits of the Father’s application, I have two comments on his written submissions.

No court direction given

7 The first concerns the Father’s repeatedly claims in his written submissions that he had paid the registration fees for the Camp pursuant to the “Court direction” during a case conference on 6 May 2026.⁹

8 I am troubled and disappointed by such claims. They are plainly disingenuous as the Court did not “direct” him to register the children for the Camp and pay its registration fees. My records of what had transpired during the case conference on 6 May 2026 are as follows:

⁷ Mother’s written submissions dated 13.05.26 at [2], [19] to [21], [25] and [27(b)].

⁸ Mother’s affidavit dated 13.05.26 at [6] and [7].

⁹ Father’s written submissions dated 06.05.26 at [3], [9], [16] and [21].

Court: [Mr XXX],¹⁰ I note from the summons that you would like the matter to be dealt with expeditiously so that the registration can take place no later than 9th of May. This is just about four days away. It is very rushed.

You have heard [Mr YYY]¹¹ regarding his client's position.¹²

This is what I propose to do. I will still fix the matter for hearing. But, given the shortness of time, I am thinking of fixing the hearing to be on the same day as the verdict on 15th of May.¹³

I will fix a time for the Mother to file her reply affidavit. Then I will hear the parties. And of course, if [Mr YYY] and [Mr XXX] can put in some brief submission points, that would be helpful.

Do you have any views on that, [Mr XXX]. When I went through your summons, you did make provision for the scenario where the Mother is not going to be cooperative. You have put in a prayer for you to register in the absence of consent by the Mother.¹⁴

I think this may not prejudice the children because the camp is in June, and I need to balance the urgency in this case, as well as giving [Mr YYY] and [the Mother] sufficient time to respond. Do you have any views on this, [Mr XXX]?

¹⁰ "Mr XXX" refers to the Father.

¹¹ "Mr YYY" refers to the Mother's lawyer.

¹² The lawyer had informed that the Mother objected to SUM 1152.

¹³ The verdict relates to SUM 469 of 2026.

¹⁴ This refers to prayer 2 of SUM 1152 which states: "... in the event the [Mother] fails or refuses to register the children by the said deadline, the [Father] be at liberty to do so without the [Mother's] consent".

Father: Yeah. Let me speak to the organisers. **What I propose is I register them first.** Depending on the outcome of the court proceedings, and if let's say they are OK to proceed, then I proceed from there. **Otherwise, we can then withdraw after the 15th of May ...**

Court: Sorry. Your voice was tapering off towards the end.

Father: Yeah. **I said we can register first. After the 15th, if there is a decision for them not to go, then I can then withdraw the registration. But for now, because it does not prejudice anything.** If I register, they can go. If they don't go, its ... [OK?]

CT: I understand. Thank you for showing flexibility, [Mr XXX].

[Footnoting, text in square brackets, and bold emphasis added]

9 Based on the above, the following is clear.

(a) It was the Father – not the Court – who had made the “proposal” to register the children for the Camp ahead of the hearing on SUM 1152.

(b) The Father had given the impression that there would be no issue with withdrawing the children from the Camp should the Court subsequently dismiss SUM 1152.

- (c) The Father did not indicate that the registration fees are not recoverable if the children cannot attend the Camp because SUM 1152 is eventually dismissed.

Requests for additional orders

10 My second comment concerns what the Father is seeking to do with SUM 1152.

- (a) In the summons, his requests are confined to court orders relating to the children’s attendance at the Camp.

- (b) However, in his written submissions, he has significantly expanded the orders sought to include compelling the Mother to ensure that the children attend other church events (12 of them), weekly Mass, and to also provide photographic proof – “bearing a date and time stamp and GPS location” – that she had done so.¹⁵

11 I decline to consider the additional reliefs sought in the written submissions.

- (a) *First*, what the Father has done in his written submissions is to transform SUM 1152 – from the original narrow issue of whether the children should the the Camp – to whether comprehensive orders requiring the children to participate in various other Christian activities for the rest of the year should be granted. The nature of the reliefs sought in the summons and the written submissions are materially different – both in kind and in degree.

¹⁵ Father’s written submissions dated 06.05.26 at [23] to [25], [26(g)] to [26(i)].

(b) *Second*, the written submissions have breached the fundamental principle that the relief which a court may grant is delimited by the prayers in the originating application. There are three reasons for this important principle. *One*, it ensures that the respondent has fair notice of the case to be met and a meaningful opportunity to file evidence in response. This is a basic incident of natural justice. *Two*, it ensures that affidavits, cross-examination and submissions remain directed to the matter in dispute. *Three*, it protects the Court from being ambushed into having to consider making orders whose factual premises have not been properly ventilated and tested.

(c) *Third*, the Father did not provide, in his affidavit, the evidential basis to support his claims concerning the additional reliefs sought.

(d) *Finally*, the comprehensive orders sought in the written submissions are already the subject of SUM 620 of 2026 filed by the Father.

Applicable principles

12 I turn to the substantive merits of SUM 1152. As stated earlier, this application raises an important question – when, if at all, should the Court exercise its coercive powers to compel one parent to facilitate a child's participation in a religious activity over the objection of the other?

13 In my view, two key principles guide the determination of this question.

14 The first – and governing – principle is the welfare of the children: see e.g., s 125(2) of the Women's Charter 1961; s 3 of the Guardianship of Infants

Act 1934. Welfare, in this context, includes the children's religious and emotional well-being.

15 *Second*, judicial restraint in making coercive orders. Not every parenting disagreement over child-related issues requires court orders to break the impasse. This is especially true where the issue involves religious matters. Let me explain.

(a) Consideration for a child's welfare is not a licence for judicial micromanagement of the child's life. The Court is not intended to function as a day-to-day surrogate parent tasked with resolving every ordinary parenting disagreement. The child's natural parents should be the ones making decisions for the child.

(b) This is especially so where the parenting disputes concerning a child's religious faith – often a deeply personal matter. Such disputes touch on important matters such as identity, conscience, and values of both the parents and the child.

(c) The courtroom is ill-equipped to determine which parent's religious preference for the child should prevail. Frequently, there is no clearly correct or wrong answers in such matters. The Court must thus remain scrupulously neutral and not make mandatory orders lightly.

16 It bears emphasis that judicial restraint in resolving parenting disputes *is itself rooted in the welfare principle*. Excessive judicial intervention in ordinary parenting disagreements risks deepening parenting conflict, entrenching hostility, and placing children at the centre of adversarial contests. In some cases, the welfare harm lies not in the disputed activity itself, but in the parents' decision to litigate it.

17 Given the above, litigation is often the option of last resort in resolving parenting disputes: see e.g., *VDX v VDY* [2021] SGHCF 2 at [42] (affirmed in *WKM v WKN* [2024] 1 SLR 158 at [92]); *WBU v WBT* [2023] SGHCF 3 at [47]; *CXR v CXQ* [2023] SGHCF 10 at [11]. A court order is a blunt instrument that may do more harm than good. Parents must thus expend their best efforts in resolving their disagreements between themselves. A Court will typically intervene on religious matters only where this is necessary to protect a child's welfare – i.e., where non-intervention would materially compromise the child's welfare: see e.g., *VIG v VIH* [2021] 3 SLR 1145 at [83] to [85].

My decision

18 I apply these principles to the present case.

Characterisation of substantive issue

19 I begin with the parties' differing submissions on how the substantive issue in SUM 1152 – whether the Mother should send the children to the Camp – ought to be characterised and determined. The Father submits that it involves a child custody issue: see [4(c)] above. On the other hand, the Mother contends that the issue of care and control is also engaged: [5(b)] and [5(c)] above.

20 In my judgment, the outcome of SUM 1152 does not turn on whose characterisation is accepted. This is because on either characterisation, the issue converges on the same issue – whether the order sought by the Father is necessary for the children's welfare.

Father has failed to prove that court order is necessary

21 As the applicant in SUM 1152, it is for the Father to satisfy the Court that the requested orders are necessary.

22 I find that he has not discharged this burden.

23 *First*, the Father's case, at its highest, is that the Camp would benefit the children because it supports their Christian upbringing and teaches positive values. (I accept that he honestly holds these beliefs.) The mere fact that an activity may benefit a child does not automatically warrant judicial intervention in the name of the child's welfare. Many activities – educational, sporting, artistic, cultural or religious – may benefit a child. Courts do not, on this basis alone, routinely transform one parent's preferred conception of good parenting into a legally enforceable obligation imposed upon the other.

24 *Second*, the proposed orders are unduly intrusive. It requires the Mother to enrol the children in the Camp, personally transport them daily over four days, and bear part of the costs.

25 *Third*, the Father appears to be seeking court orders to enforce the Mother's compliance with his preferred approach to the children's religious upbringing. This perception is reinforced by the fact that he had attempted, in his written submissions, to improperly expand this application far beyond attendance at the Camp – by seeking further orders relating to attendances at weekly Mass and in other multiple church events, as well as the provision of photographic proof of such attendances. As noted earlier, Courts are slow to exercise its powers to serve such motives. Court orders are not tools to be

exploited by one parent to impose his or her conception of ideal parenting on the other parent.

26 *Fourth*, a court order is appropriate only if the children's absence from this particular camp would materially compromise their welfare. There is no evidence that this is the case.

(a) The Camp is non-compulsory. This is not a case where they are being deprived of, for instance, education or religious identity.

(b) There is also no evidence that the Mother is attempting to erase the children's Christian identity. It is undisputed that the children remain enrolled in Christian schools.

(c) Furthermore, clause 7 of the Consent Order specifically provides that –

The [Father] shall ensure that he sends the children for their Catechism classes ([time] on Saturdays at [name of church]). The [Mother] shall bring the children for mass on Sundays, and neither the [Father], nor the [Mother] shall ask the children about their weekend activities with the other parent or catechism or mass.

[Text in square brackets and emphasis added]

Based on clause 7, the Father remains free to expose the children to religion generally during his own access time with them.

27 *Finally*, and importantly, I accept that the Mother's decision not to send the children to the Camp is based the children's welfare.

(a) She explains that the son has recently expressed suicidal ideation and is presently undergoing counselling. The son feels stressed about attending the Camp. The daughter similarly expressed her reluctance to attend.

(b) Whether these concerns ultimately justify non-attendance is not the decisive point. The significant point is that the Mother's decision not to send the children to the Camp cannot fairly be characterised as irrational, malicious, or calculated solely to undermine the Father's relationship with the children.

(c) It bears highlighting that parents may, in good faith, differ on what is best for their children, including on matters touching religion and emotional readiness. A conscientious disagreement is not transformed into parenting misconduct merely because the other parent considers the proposed activity beneficial.

Conclusion

28 SUM 1152 is accordingly dismissed.

29 I return to the two questions with which this judgment began. Is it appropriate for a parent to use the coercive powers of the Court to compel his children's participation in a religious activity over the other parent's objection? And should the Court pass judgment on which parent's religious preference for the children is the correct one? The answer to both questions is that it should not. In family disputes touching on religion, identity and conscience, judicial restraint is often the wiser choice.

30 The exercise of restraint in this case should not be misunderstood as the Court's indifference to religion or its benefits of the Camp to the children. Rather, the restraint reflects recognition of a deeper principle – that absent clear evidence of harm to a child's welfare, the law should be slow to compel one parent into facilitating the other parent's religious choices for their child. The Court protects the child's welfare – not the parents' preferences over the practice of religion.

31 For avoidance of doubt, nothing in this judgment prevents the Father from sharing his faith with the children during *his own access time*, in the manner contemplated by the Consent Order, and subject always to the children's welfare, their wishes and their emotional well-being.

Kow Keng Siong
District Judge

A Rajandran (M/s A Rajandran) for the Mother
The Father is in person.
