

IN THE FAMILY JUSTICE COURTS OF THE REPUBLIC OF SINGAPORE

[2026] SGFC 69

SSP 643 of 2025

Between

YDO

... Applicant

And

YDP

... Respondent

SSP 1007 of 2025

Between

YDP

... Applicant

And

YDO

... Respondent

GROUNDS OF DECISION

[Family Law — Personal Protection Order]

[Family Law — Personal Protection Order — Emotional or Psychological Abuse]

[Family Law — Personal Protection Order — Emotional or Psychological Abuse — Applicability of the Contextualised Objective Approach]

[Family Law — Personal Protection Order — Necessity]

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YDO v YDP

&

YDP v YDO

[2026] SGFC 69

Family Court — SSP 643 of 2025 and SSP 1007 of 2025

Magistrate Soh Kian Peng

12, 18 & 20 August 2025, 2 September 2025 and 11 November 2025

8 May 2026

Magistrate Soh Kian Peng:

1 Sticks and stones may break my bones, but words can never hurt me. So, the old adage goes.

2 The wisdom behind these words, however, may hide a deeper truth: that in reality, words do leave their mark – and perhaps, the deepest scars are left by words – whether intentionally or carelessly – said by those closest to us, be they our lovers, friends, or closest kin.

3 Then there is also the way in which these unkind words are conveyed to us. Careless utterances can wound deeply for it frustrates the expectations that we may have of those whom we hold the closest. Relentless and repeated tirades, on the other hand, may crush the spirit entirely. The pain suffered from such words may, in some cases, lead to the conclusion that emotional or psychological abuse (see s 58B(4) of the Women's Charter 1961) had been

inflicted. The task of the court, as was observed by my brother judge, is to distinguish between “the pain that is an inevitable feature of human relationships...and conduct that has crossed into something the law recognises as abuse”: *YBD v YBC* [2026] SGFC 49 at [2].

4 The present case is another example of what may amount to emotional and/or psychological abuse.

5 These were the two applications before me:

(a) SSP 643 was the Father’s application that he had brought on behalf of his daughter (“K”). He sought a Personal Protection Order (“PPO”) for her against the Mother.

(b) SSP 1007 was the Mother’s application. She sought a PPO for herself and the two children ([K] and the son) against the Father.

6 The Father was represented by Ms Dorothy Tan and Ms Athelia Ong. The Mother, having discharged her counsel on the eve of trial, was self-represented. I heard the trial over several days. Judgment was handed down on the 11th of November 2025. These are the reasons for my decision.

7 The applicable legal provisions are to be found in Part 7 of the Women’s Charter 1961. To obtain a PPO, the applicant must establish the following two requirements on a balance of probabilities:

(a) First, that the respondent had committed an act of family violence, or was likely to commit family violence, on the person sought to be protected.

(b) Second, that it was necessary, for the protection or personal safety of the person to be protected under the order.

8 It is with this broad legal framework in mind that I now turn to deal first, with the Father’s application in SSP 643.

9 The crux of the Father’s case is that the Mother’s conduct or behaviour towards K constituted emotional or psychological abuse as set out in s 58B(4) of the Women’s Charter 1961. Specifically, that provision states:

- (4) “Emotional or psychological abuse” means conduct or behaviour that —
- (a) torments, intimidates, harasses or distresses a person; or
 - (b) causes or may reasonably be expected to cause mental harm to a person, including thoughts of suicide or inflicting self harm.

10 I had asked parties to address me on whether the approach to be taken in assessing whether emotional abuse had been committed was either: **a)** objective, **b)** part-subjective, part-objective, or **c)** subjective. Since my decision was handed down on 11 November 2025, there have been several cases from the Family Court setting out the appropriate test for assessing whether emotional or psychological abuse had been committed. These cases suggest that there is a high threshold to be met for emotional or psychological abuse to be made out, and that the court will adopt an objective approach, bearing in mind the relevant context: see *YBD v YBC* [2026] SGFC 49 at [19] – [107]; *XXW v XXX and other matters* [2026] SGFC 23; *XZU v XZV* [2026] SGFC 31 at [29] – [33] citing *XWB v XWC* [2025] SGFC 135.

11 The adoption of the objective approach in assessing whether there had been emotional or psychological abuse, however, may encounter several

difficulties where the PPO is sought on behalf of a child. This is especially the case where the allegation is that one parent has been too harsh in their disciplinary methods. While there is a correction exception to family violence, which accounts for the fact that parents can discipline their children, this exception only applies to *physical* abuse, and not emotional or psychological abuse: s 58B(2)(c)(ii) of the Women’s Charter 1961. It thus appears that while parents *can* discipline their children, care must be taken such that acts of discipline do not cross the line and stray into the realm of emotional or psychological abuse. The *real* question then, is where the line should be drawn? If we adopt the “contextualised objective approach” as laid down by my brother judge in *YBD v YBC* [2026] SGFC 49 as the universal test for determining whether emotional or psychological abuse had been committed, would it be all too easy to conclude that a child was indeed “tormented” or “distressed” after having been chided by their parent for bad behaviour?

12 Ultimately, these are all questions that will have to be decided elsewhere. Having considered the evidence before me, in my judgment, regardless of the approach taken, I found that the Mother’s actions did cross the line and amounted to emotional or psychological abuse.

13 For one, it was abundantly clear to me that [K] was tormented and distressed by the Mother’s verbal lashings. The audio recordings bore out the excruciating nature of the verbal abuse [K] had to endure. She can be heard sobbing in some of the audio recordings that were played in court.

14 Then there was also what the Mother had said to [K]. For example, this was an excerpt of the transcript of a recording made on 12 February 2025 which the Father had exhibited in his affidavit:

Mother: [K] Okay. Okay. The start of the sentence, you got that correct. But you didn't write it correctly, did you? You...you identified it correctly, but you forgot to write the capital S. Write the capital S right now. Okay? Okay. Do that. Write that. Capital S.

K: Capital S...S....S.

Mother: So it would be capital S, right?

K: Mummy, S.

Mother: S is just the name of it.

There is the sound of something dropping. Mother now speaks in a louder voice.

Mother: Do not fucking drop your pencil. Pick it up! Everytime you drop it, you break the lead.

There is the sound of chair being dragged

Mother: God, I'm fucking going to stab you in the eye with this. Alright. I'm so fucking with your shit. Just get it right. Everything is fucking wrong, countless times.

What is this? Singapore. Where is the "g"? Right? Where is the "g", [K]?

K: NC

Mother: How do you spell Singapore. How Singapore?

K: S.....

Mother: I've taught you this so many times in the past. Sing...a.pore. So easy....easy. Spell it. Come on, hurry up, [K].

[K]: S-A-G-T

Mother: Wrong! Say it again.

[K]: S....

Mother: Okay. Write it then. Write it. Write it. Head straight, [K]. Head straight.

Mother makes a frustrated sound.

Mother: Who write like that. For God's sake, [K]. Why, you fucking cock-eyed, is it? [NOT CLEAR] What's that? Sword? Sword? Fuck. What the fuck, [K]! Come on. Sing. Write the word "Sing".

Write the word “Sing”, [K]. God, you’re fucking stupid. This is un-fucking believable. Sing...not Sig. Sing, [K]. You like to sing and dance. Write “Sing”. Fucking stupid! My God! Hurry up, [K]. You are wasting my time, alright?

...

Mother: Come on.

K: Finished.

Mother: “Her birthday is in June. Her birthday is in June.” Write “Her birthday is in June”.

Woman raises her voice.

Mother: You went Happy Birthday to how many fucking birthdays? I’m not going to let you go to birthdays anymore unless you can finish “Birthday”. You went to how many fucking happy birthday parties. You still don’t know how to spell birthday.

K: B.....

Mother: Just write it, [K]. Come on. Birthhhday. Birthhhday.

Woman speaks in a much louder voice

Mother: Don’t! Head up straight. Look straight, head straight. Bera day? Bera day? Come on, [K]. Do better, [K]. Do better. Come on.

Woman is now shouting.

Mother: How many fucking birthdays? How many fucking times you sing Happy Birthday? And you still don’t know how to spell “Birthday”. “Birthday”, [K]. Go! Birthday. Happy birthday. It’s the same fucking word. Birth....

Woman is shouting louder

Mother: BIRTHDAY. Now write it. You so fucking gundu. How many fucking birthdays have you been to? You still can’t fucking get it right. You been to so many fucking birthdays and you still can’t get the fucking word “Birthday” right. Write B....

K: B.....

Woman is screaming louder

Mother: B I R T H, [K]!. What the fuck! Birthday. Not ritual day. Birthday. Birthday, [K]. Birthday.

K: [NOT CLEAR]

Mother: Birthday. Fucking birthday. BIRTH BIRTH BIRTH!!! Fucking, [K]. FUCK! FUCK! FUCK! BIRTH!

There is sound like slapping sound

Mother: Go!

Child starts to cry

....

15 As I have mentioned, the audio recordings which were played spoke volumes as to the *intensity* and *duration* of the Mother’s tirades against the daughter. I would further add that it must also be remembered that [K] is a young girl – at her tender age, the views and opinions of her parents must weigh greatly in her mind. One can therefore only imagine the torment and distress that she must have felt at being labelled “useless”, and at the vulgarities hurled at her, in her Mother’s relentless scoldings.

16 I thus concluded that the Mother had indeed committed family violence against [K]. I also deemed it necessary to order a PPO for [K]’s personal safety or protection. While raising a child can bring joy, it also brings with it, its own unique set of stressors. In this vein, it was clear to me that the Mother did not have a healthy way of coping with stress (especially stress arising from the course of her work), and this had resulted in her venting her frustrations on [K].

17 That being said, I considered it appropriate to limit this PPO for a period of 3 years (till 11 November 2028). I explain.

18 First, I found that the Mother did recognise that the manner in which she had acted towards [K] was out of bounds, and that she was willing to change for the better.

19 Second, while the objective of the PPO regime was to shield victims of family violence, where a PPO is being sought against a parent for a child, the necessity requirement should also be considered against the backdrop of the parent-child relationship. There are several reasons for this.

20 For one, while the PPO regime, as instantiated in the Women’s Charter 1961, serves to protect victims of domestic abuse, Parliament had made it clear that there too should be a focus on rehabilitating perpetrators of family violence. As was stated by the then Minister of State for Social and Family Development, Ms Sun Xueling at the Second Reading of the Women’s Charter (Family Violence and Other Matters) (Amendment) Bill) No. 18/2023 (the “Second Reading”):

The third Focal Area is on empowering the Court to make additional rehabilitative orders, raise penalties and strengthen enforcement against breaches of family violence-related offences.

Not only do survivors need a supportive environment to heal from their trauma, perpetrators also need a safe environment where they can share their struggles openly, without being judged. **This set of amendments aims to address the root causes of family violence perpetration and to provide the necessary support to perpetrators in their rehabilitation journey. With appropriate support and intervention, perpetrators can learn to better manage their emotions and behaviours and to break the cycle of violence.**

During last year's National Family Violence Networking System Conference, I met a group of men from Thye Hua Kwan Family Service Centre's Brotherhood Programme. This programme supports males who had past histories of aggressive episodes towards their loved ones. These men were supported to examine the consequences of their aggression on their loved ones. With

the support of fellow male participants, they experienced positive behavioural changes.

During the Conference, the participants of this programme sung a self-composed song titled, "A Better Man". I would like to quote a verse from the song: "Please hear my story, please don't deny me. A tiny seed of hope is crying to see. With a heart of gold and all the love in the world, give us one more chance to start again."

I applaud these individuals who took the bold step to try to become a better person for themselves, their families, friends and the community. MSF and our community partners are committed to supporting perpetrators, whether male or female, in their rehabilitation journey.

Currently, to rehabilitate perpetrators, the Court may make a Counselling Order when it issues a PPO. About 93% of PPOs issued from 2018 to 2022 were tagged with a Counselling Order. A person under a Counselling Order, and this may be the perpetrator, survivor, or a child is required to attend a counselling programme offered by social service agencies appointed by MSF.

With a greater focus on rehabilitation of perpetrators, the new section 60E expands the scope of the existing Counselling Order to include other programmes, treatments and interventions. These include parenting programmes, caregiver training, or family therapy and other programmes which cater better to the risk levels and unique needs of each perpetrator.

Counselling will help perpetrators such as Mr Y, caregiver of his wheelchair-bound mother. Mr Y threatened his mother with a knife and threw away her medication as he did not think the medication was effective. Through the Court-ordered mandatory counselling, Mr Y gained insight into his mother's care needs and the impact of his actions on her. He also completed a caregiver training to better care for his mother. Upon the completion of the mandatory counselling sessions, Mr Y voluntarily continued with additional counselling sessions and showed significant improvement in his behaviour. Mr Y and his mother now enjoy a better relationship with no further incidence of violence.

[emphasis added]

21 That the PPO regime has a rehabilitative aspect should not come as a surprise. After all, it was meant to deal with abuse within familial relationships (s 58A read with s 58B(1) of the Women's Charter 1961). It goes without saying

that such familial relationships, which are the closest and most intimate bonds that we can share with another person, cannot and will not be so easily sundered except in the most dire of circumstances.

22 One example, which lies at the heart of the Father’s application in SSP 643, is the parent-child relationship. A child needs the support of both their parents as they are growing up. That is why our courts have continually emphasised the need for *both* parents to continue to cooperate and to work for the best interests of their children (*XRA v XRB* [2025] SGFC 94 at [50(e)]; *XAI v XAH and another matter* [2025] SGFC 93 at [54]), even in the wake of a divorce: *XDZ v XEA* [2024] SGFC 90 at [74(f)]; *VMG v VMH* [2023] SGHCF 45 at [10].

23 It is, however, important to also acknowledge the *impact* a PPO can have on the parent-child relationship – especially if one considers how such orders are viewed from the perspective of the child.

24 The law, as it stands, demands that the necessity of granting a PPO be assessed by weighing the future risk of family violence being inflicted on the person sought to be protected under the order: *XFL v XFM* [2024] SGFC 103 at [19] – [23]; *YBD v YBC* [2026] SGFC 49 at [108] – [112]. In my judgment, in applications such as the present one, this assessment cannot be done in a vacuum, without consideration for the possibility for change and rehabilitation on the part of the parent against whom the order is sought, and without any consideration for the parent-child relationship. One must consider whether the PPO can be calibrated in a way that protects the child while allowing, as far as possible, the preservation and eventual rehabilitation of the parent-child relationship. One way in which this may be done would be to grant a time-limited PPO together with a counselling order for both parents. Such orders

would not only ensure protection for the child but also provide room for reflection and change. In the event where change is not possible, and *further* incidents of family violence continue to take place, it may be possible for an application to be taken out to vary the PPO, or for further orders to be made: see s 60A(4) and s 60B of the Women's Charter 1961.

25 To be clear, I am not saying that the existence of a parent-child relationship is *the* determining factor in the assessment of necessity, and that this must mean that a time limited PPO must be ordered whenever an application for a PPO on behalf of a child is taken out against their parent. There may be cases where the circumstances demand that a PPO which is not limited by time be granted against the parent in question.

26 Insofar as the Father's application in SSP 643 was concerned, I considered that to not impose a time limit on the PPO would send the wrong signal: that the Mother was incapable of change, and that [K] would require protection from her for an indefinite period of time (or, at least, until the PPO is successfully revoked: see s 60A(4) of the Women's Charter 1961). Neither of these things were true – the Mother has it within herself to change for the better, and to be a better parent. Further, there was also evidence that [K] did have a bond with the Mother. That much to me was clear from the photographs the Mother had adduced of herself together with the daughter.

27 In my judgment, a time limited PPO for a period of 3 years would strike a balance between ensuring that [K] is protected, whilst affording the Mother the time and space to equip herself to better handle the stresses that come with being a parent, so that she can fully embrace her role as the mother in the years to come.

28 To that end, I also ordered that the Mother go for counselling in the hopes that this would help her in her journey. That being said, this was not a journey that she would embark on alone. I also deemed it fit to order that the Father attend counselling so that he may equip himself with the necessary skills to support the Mother.

29 I must emphasise that, notwithstanding my findings above, my ruling should not be taken as an indictment of the Mother and her capability as a parent. My task was to judge whether [K] required protection, and not to judge the Mother's worth as a parent. As I have explained, I have found it necessary to issue the PPO for [K]'s protection, but this shall be tempered against the reality that the PPO should not destroy the bond that they share. The orders I have crafted are meant to ensure that [K] would be protected, whilst encouraging and equipping the Mother to adequately tackle the root cause of her behaviour towards [K] that was the basis for the Father's application in SSP 643.

30 As a final point, while I have emphasised the rehabilitative aspects of the orders that I have made, it should not be lost on the parties – especially the Mother – that breaches of the PPO are an arrestable offence that may be punished by either a jail sentence and/or a fine: see ss 63C and 63D of the Women's Charter 1961.

31 I turn now to deal with the Mother's application in SSP 1007. Ms Tan had made the point that the Mother's application in SSP 1007 should not be entertained because it was filed purely in retaliation to the Father's application and was not a *bona fide* application motivated by any real desire to protect herself or the children.¹

¹ Father's Written Submissions at paragraph 108.

32 I agree. The Mother had said as much. After I had asked the Mother a clarificatory question, she went on a long spiel, in which the real motivation behind her application in SSP 1007 came out.

33 In her words, she said that if the Father had a PPO against her, it would create a “lopsided imbalance” that would want to make her step away from caring for [K], and that such an order would put power in the Father’s hands. Later, when confronted in cross-examination about whether her application was about enabling her to continue to have power over [K], the Mother explained that it was about preserving her caregiving responsibilities and dealing with the “threat of a husband” who clearly disliked her and was trying to take her down and prevent her from being a good mother.

34 It was therefore clear to me that the Mother had not taken out her application with the intention of seeking protection for herself and the two children. It was clear that she thought that having an application of her own would not only preserve the power dynamic in the relationship between herself and the Father, but also thwart any attempt by the Father to weaponise the PPO to prevent her from caring for [K].

35 Given this, I was of the view that the Mother’s application in SSP 1007 should be dismissed. The PPO regime must not be used as leverage in parenting disputes. In any event, I did not find that she had proven that the Father had committed family violence on herself or the two children.

36 In relation to the two children, the Mother cited an incident that had taken place on the 15th of March 2025. The Father was with both children at the time. The Mother claims she heard shouting followed by a loud thud. The son had run to her, with [K] following close behind. He complained to the

Mother that the Father had picked him up in a fit of rage and thrown him onto the floor. His head had hit the floor.

37 The Father's account was that the children were playing rough with each other. [K] had hit the son, who burst into tears and ran to the Mother.

38 I did not find that the Mother had established, on a balance of probabilities, that her account of events was true. For one, as Ms Tan had pointed out, the Father is a tall and well-built man. If it were indeed the case that he had picked the son up and thrown him onto the ground (as the Mother says he did), it was very likely that the son would have sustained serious injuries. In this connection, it was also odd that the Mother did not seek immediate medical attention for the son. Instead, her account was that it was bad judgment on her part that she did not bring him to see the doctor. As a final point, while the Mother had also adduced evidence of a drawing made by the son, which she says depicted the incident, I declined to give any weight to this piece of evidence. That was because it was apparent to me that the Mother had recorded the video herself – and absent the son being present in court to testify, I cannot ascertain why he had made that drawing, what the drawing represented to him, or whether he had been coached into saying certain things which were recorded in the video.

39 I turn now to the Mother's complaints in relation to herself.

40 I start with the 12th of May incident. The Mother alleged that the Father had not only blocked her from going up the stairs but then proceeded to push her down the stairs. I did not find, on the evidence before me, that the Mother had established that the Father had committed family violence on her. In my judgment, the most that can be said about this incident is that there was a quarrel

between the Father and the Mother, and the Father had simply refused to give way to the Mother who was headed up the stairs.

41 In relation to the 30 December 2024 incident, the Mother’s allegation was that the Father had “forcefully” yanked her bag and caused her spectacles to gouge a wound on her cheek. This quarrel had happened whilst the family was driving back to Singapore from Malaysia.

42 I did not find that the Father had committed family violence in this incident. It was clear to me that the Father and the Mother had gotten into a heated argument. The both of them had gotten out of the car, and there was a scuffle over the backpack that the Mother was carrying which contained, amongst other things, the children’s passports. In the ensuing scuffle and the rush to gain control of the driver’s seat, the Mother had obviously been injured but given the context in which the injury had happened, this does not, in my judgment, fall within the definition of physical abuse as is set out in the Women’s Charter.

43 As for the incident in September 2019, where the Mother alleged that the Father had punched her and physically hurt her whilst they were living in the United Kingdom, I agreed with the points raised by Ms Tan: that the Mother had simply not adduced any evidence to corroborate her account. There were no police reports, or medical records placed before me to shed light on what had actually happened in that incident.

44 In any event, I would go further to add that the Mother had not shown the necessity of ordering a PPO for herself or the two children. I agreed with the point raised by Ms Tan – the fact that the Mother can be heard, during some of the recordings, yelling and berating the Father, spoke volumes as to the true

dynamics within the family. I did not find that the Mother was the battered wife that she sought to portray herself to be.

45 As for the children, the Mother had not, apart from her general allegation that the children were not safe with the Father, pointed to any risk factors which made it necessary for a PPO to be granted for their protection.

46 To sum up, SSP 643 was allowed in part. [K] was granted a PPO (limited for a period of 3 years till 11 November 2028). The Mother and the Father were also ordered to attend counselling. As for SSP 1007, that was dismissed.

47 I concluded my judgment with the following words for the Father and the Mother:

(a) It is clear to me that there is much unhappiness between the both of you. That being said, I hope that you will both use this opportunity to start on a blank slate and to move on, after these proceedings. You have two young and wonderful children. You both owe it to them, to give them a happy family, and the best possible future. That, however, cannot happen if the both of you are constantly bickering, and fighting with each other. I hope that the both of you can find it within yourselves to leave these unhappy incidents behind, to forgive each other, and in time, rekindle the love you once had. To that end, let me leave you with the words of Max Erhmann, in his poem, *Desiderata* – I trust that you will find some wisdom, strength, and encouragement in his words.

48 There was no order as to costs.

YDO v YDP
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Soh Kian Peng
Magistrate

The Wife in person and unrepresented;
Dorothy Tan and Athelia Ong (PKWA Law Practice LLC) for the
Husband.
