

IN THE FAMILY JUSTICE COURTS OF THE REPUBLIC OF SINGAPORE

[2026] SGFC 31

SSP 2336 of 2025

Between

XZU

And

XZV

... Applicant

... Respondent

GROUND OF DECISION

[Family Law — Personal Protection Order]

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XZU

v

XZV

[2026] SGFC 31

Family Court — SSP 2336/2025
District Judge Goh Kiat Yi

12 February, 13 February 2026

12 March 2026

District Judge Goh Kiat Yi:

1 SSP2336 of 2025 (“SSP2336”) was an application by a daughter-in-law (“the applicant”) against her father-in-law (“the respondent”) for a personal protection order for her daughter, C.

2 I heard the matter on 12 February 2026 and delivered my decision on 13 February 2026 with reasons which I now supplement.

Background

3 The Respondent is 80 years old and is the paternal grandfather of C, who turns 15 this year. There are ongoing divorce proceedings between the Applicant and the Respondent’s son. C has a younger sister, D.

4 The Respondent and his wife, the paternal grandmother, have been living with the family since C was born. They helped care for the grandchildren as both C's parents were working.

5 The Applicant commenced the present application sometime in November 2025. In her application form, she sought a personal protection order ("PPO") on behalf of C on the basis of a single incident of emotional and psychological abuse allegedly committed by the Respondent on 29 October 2025.

6 The Applicant did not raise any past incidents in her application form.

The evidence

7 The Applicant filed a 3-page document of which only the first page was admitted into evidence. At the mentions stage of the proceedings, the Applicant confirmed that the other two pages contained evidence from third parties that she was not calling as witnesses and they could be disregarded. The Applicant's document was admitted and marked as A1.

8 At the hearing, the application form containing the application details was admitted and marked as A2.

9 The Respondent filed an 11-page affidavit which was admitted and marked as R1.

10 The Applicant called C as a witness. To Respondent counsel's credit, he conducted the cross-examination of C with sensitivity and care, often suggesting breaks when there were slight hints of discomfort experienced by C. He also

asked fair and reasonable questions to advance his client's case without being unduly confrontational. I observed that C was comfortable in court.

The Applicant's case

Incident on 29 October 2025

11 In her application form, the Applicant alleged that the Respondent had reprimanded C when she was about to go downstairs to dispose of rubbish as he wanted her to finish tidying up the study table. C then informed him that she would continue tidying up later. However, in the presence of her friend, the Respondent raised his voice and told C to leave the house. When C returned, the Respondent questioned C why she had come back. C responded that the house is not his and subsequently walked away. This sequence of events was largely repeated in A1.

Incident on 26 November 2026

12 The Applicant raised a further incident of alleged family violence which occurred after the filing of SSP2336 in her document, A1. The Applicant alleged that on 26 November 2025, when C was having lunch at the dining table, the Respondent sat down to have his meal. He behaved in an aggressive manner and slammed his cup onto the table and forcefully placed other items on the table. The Respondent also allegedly stared at C.

The Respondent's case

13 The Respondent resisted the application. He averred that he and his wife have been staying with the family to care for the grandchildren. He added that the relationship with the Applicant had deteriorated since the commencement of the divorce proceedings between her and his son. The Respondent said that he and his wife used to accompany the grandchildren to school and the playground. They used to eat together and talk to each other but the grandchildren have since been instructed to ignore them.

Incident on 29 October 2025

14 For the incident on 29 October 2025, the Respondent averred that he had noticed that C was cleaning her study table and creating a huge mess. Instead of cleaning the mess, C appeared to be leaving the house with her friend without clearing up. To get her attention, he raised his voice to ask her to clean up. C then shouted, “this is my house, not your house”. The Respondent was shocked and asked C to get out of the house. He then walked back to his room and stayed there without any further interaction with C. The Respondent claimed that he only raised his voice to discipline C and was shocked at her response.

Incident on 26 November 2025

15 As for the 26 November 2025 incident, the Respondent testified that he is 80 years old and would drop things from time to time. He said that it is not easy for him to hold onto a hot plate. He placed the plate on the table and that was what happened. He denied staring at C.

Legal Requirements

16 I start with the legal requirements for a PPO. These applications are filed under Section 60 of the Women’s Charter 1961 (“the Charter”) which introduced a new family violence regime on 2 January 2025 (see *XNY v XNZ* [2025] SGFC 59 at [4]-[13] (“*XNY*”) for a more detailed background).

Two requirements for a PPO to be granted

17 Section 60A(1) of the Charter essentially provides that the court may, on an application, make a protection order to restrain *X* from committing family violence against *Y* if the court is satisfied on a balance of probabilities, that *X* has committed or is likely to commit family violence against *Y* and the protection order is necessary for the protection or personal safety of *Y*.

18 This provision imposes two requirements before a personal protection order can be issued. First, the court must be satisfied that the respondent has committed family violence or is likely to commit family violence against the family member. Second, the court must be satisfied that it is necessary for the protection or personal safety of the family member to issue the PPO. The Applicant bears the burden of proving these requirements (see *XNY* at [11]).

The definition of family violence

19 Family violence is essentially defined in Section 58B(2), 58B(3) and 58B(4) of the Charter as the commission of physical, sexual, emotional or psychological abuse against a family member as follows:

Physical abuse includes -

- (a) conduct or behaviour that:
 - (i) causes, or threatens to cause, personal injury, or physical pain to a person; or
 - (ii) Threatens a person with the death or injury of the person; and
- (b) also includes wrongfully confining or restraining a person against the person's will; but
- (c) does not include force lawfully used:
 - (i) in self-defence; or
 - (ii) by way of correction towards a child below 18 years of age.

Sexual abuse includes conduct or behaviour that coerces, or attempts to coerce, a person to engage in sexual activity.

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 self-harm.

20 Section 58B(5) of the Charter further provides that abuse may take the form of a single instance of conduct or behaviour or a course of conduct or behaviour. Section 58B(6) of the Charter further states that the conduct or behaviour that constitutes abuse need not be directed at the family member in

question, but must be capable of being seen, heard or otherwise perceived (directly or indirectly) by the family member in question.

Issues to be determined

21 There are two issues to be determined. First, whether family violence has been committed or is likely committed by the Respondent. Second, whether it is necessary to issue a PPO against the Respondent

Whether family violence has been committed or is likely committed by the Respondent

Incident on 29 October 2025

22 I start with the incident on 29 October 2025, which is the only incident raised in the application form when the applicant commenced SSP2336.

23 It is common ground that there was an argument between the Respondent and C arising from the Respondent wanting C to clean up some mess in the home. The key difference in the narrative was the sequence of events, in particular, when did C shout at the Respondent and whether she used the words “this is my house, not your house”.

24 I accepted C’s version of events. I observed C to be forthcoming, consistent and did not embellish her evidence. She also readily agreed to two points that were detrimental to her case in the course of cross-examination as follows:

(a) C accepted that what the Respondent did was basically to discipline her because the Respondent did not want his wife, the paternal grandmother, to clean up the mess for her.

(b) C also agreed that she had the courage to speak back to the Respondent during the incident to defend herself by saying to the Respondent that “this is not your house”.

25 On the other hand, the Respondent’s oral evidence at trial was inconsistent with his affidavit. This inconsistency was glaring on two points. The Respondent testified in court that he did not ask the child get out of the house and did not raise his voice at her. These contradicted his own averments on affidavit where he said that that he did raise his voice and asked C to get out of the house at some point. It may well be that the Respondent being 80 years old may have memory lapses and was not dishonest. However, these inconsistencies made his testimony less reliable.

26 I therefore accepted the Applicant’s version of events.

Incident on 26 November 2025

27 Turning to the second incident, the Respondent gave evidence that his hands were weak and he has difficulties holding onto his plates and therefore could have forcefully placed them on the dining table. I note that the Respondent’s evidence was not challenged by the Applicant at all during cross-examination and the Respondent’s explanation was reasonable. Be that as it may, I note that C testified that the Respondent did not directly engage her on that occasion.

Was family violence committed or likely committed

28 Both the Applicant and C confirmed that the Respondent has never been physically violent to C since he lived with the family for the past 14 years. The claim rests solely on the allegation of “emotional and psychological abuse”.

29 In interpreting the type of conduct that falls within the realm of “emotional or psychological abuse”, the case of *XWB v XWC* [2025] SGFC 135 (“*XWB*”) is instructive. The court in *XWB* noted that despite the statutory definition, determining what constitutes “emotional or psychological abuse” remains subjective and open to various interpretations. Given the broad definition, an overly liberal interpretation may lead to outcomes inconsistent with the legislative intent (see *XWB* at [8]).

30 The Court in *XWB* referred to the Second Reading of the Women’s Charter (Family Violence and other Matters) (Amendment) Bill (Singapore Parliamentary Debates, Official Report (4 February 2023) vol 95) (Minister of State for Social and Family Development, Ms Sun Xueling) (“Second Reading”) where the Minister of State highlighted examples of emotional or psychological abuse such as:

- (a) a perpetrator threatening to withhold monthly allowances;
- (b) a perpetrator constantly monitoring the victim's whereabouts;
- (c) a perpetrator isolating the victim from friends and family;
- (d) a perpetrator preventing the victim from leaving the house, and threatening the victim with negative consequences to compel the victim’s compliance;

- (e) a perpetrator threatening to evict the victim without financial or physical resources and refusing to renew the victim’s long-term visit pass; and
- (f) a perpetrator creating fear in the victim of eviction and separation from children, which prevents victims from seeking protection (see *XWB* at [9]).

31 The Court in *XWB* observed that the common thread in the examples is the perpetrator’s controlling behaviour over the victim through fear (whether for personal safety or likely consequences), resulting in mental or emotional harm to the victim. Such behaviour is referred to as coercive control in the Second Reading (see *XWB* at [10]).

32 The Court in *XWB* further opined that despite the expansive definition of “emotional and psychological abuse”, not every action causing distress will constitute emotional abuse. The statute uses “emotional abuse” rather than “emotional distress”, suggesting that the victim must suffer some level of emotional harm beyond mere unhappiness (see *XWB* at [11]).

33 The Court in *XWB* concluded that the purpose of a PPO is to protect victims from harmful behaviour by establishing clear boundaries of conduct that a reasonable person would consider unacceptable. A PPO is not intended to punish the aggressor or pass judgment on their social interactions or parenting style. The Court further observed that finding of family violence has serious ramifications for the relationship between the aggressor and the victim and could accelerate the breakdown of familial ties. While the Court will not hesitate to grant PPOs in deserving cases, it should be cautious about granting

applications where the facts fall short of demonstrating emotional or psychological harm (see *XWB* at [12]).

34 I largely concur with the observations in *XWB* and add a few further observations to highlight that the bar to finding “emotional or psychological abuse” is not a low one.

35 First, the definition of family violence has to be a sufficiently serious as the breach of a PPO, which would entail the further commission of acts of family violence, carries with it penal consequences. Section 63C of the Charter provides that a person who is guilty of a family violence offence shall be liable on conviction –

- (a) if the offence is aggravated — to a fine not exceeding \$10,000 or to imprisonment for a term not exceeding 18 months or to both; and
- (b) in all other cases — to a fine not exceeding \$10,000 or to imprisonment for a term not exceeding 12 months or to both

36 Second, it is important for the Court to consider the degree of emotional, psychological or mental harm suffered by the victim as a result of the perpetrator’s actions. As the Minister of State noted in the Second Reading, “*the definition of family violence looks to the harm caused by the perpetrator, rather than the intention of the perpetrator...*” (see Second Reading).

37 The illustrations set out in Section 58B(6) of the Charter also suggests that there should be demonstrable emotional, psychological or mental harm suffered by the victim. These illustrations are essentially as follows:

- (a) A perpetrator spreads false rumours to third parties' about his/her spouse being promiscuous. The victim spouse finds out about the rumours and is distressed.
- (b) A perpetrator is prone to smash furniture in the victim's house when he/she is angry. This behaviour causes the victim's child to be distressed and in fear of personal injury.
- (c) A perpetrator repeatedly makes demeaning comments to belittle and humiliate the victim in front of their children. The perpetrator threatens to stop giving the victim a monthly allowance if the victim contacts his/her family or friends or seeks help. The victim suffers mental harm as a result.

38 Notably, Section 58B(4)(b) also defines emotional and psychological abuse as conduct or behaviour that causes or may reasonably be expected to cause mental harm to a person, including thoughts of suicide or inflicting self-harm. Again, the focus is on the emotional, psychological or mental harm to the victim which is serious.

39 Taken together, it is my considered view that there must be demonstrable emotional, psychological or mental harm suffered by the victim as a result of the perpetrator's actions for there to be a finding of emotional or psychological abuse. Such emotional, psychological or mental harm has to go beyond ordinary feelings of frustration, indignation, annoyance and unhappiness which is inherent in everyday life.

The two incidents raised do not amount to family violence

40 Turning to the present case, I found that the Respondent's conduct did not amount to emotional or psychological abuse. For the 29 October 2025 incident, C testified that not all the mess, including those on the floor, was cleaned up at the time she was leaving the house. Importantly, C accepted that the Respondent was disciplining her as he believed that she was not going to clear up, leaving the paternal grandmother to clean up for her.

41 Second, there were no vulgarities or abusive language used by the Respondent. C herself could not recall what the Respondent said when he allegedly spoke to her in an unkind manner. Whilst it is not pleasant to be asked to "get out of the house" and later commenting "why did you come back", these are at best angry words that arose from an act of discipline.

42 C also accepted that she had the courage to defend herself by telling the Respondent "this is not your house". One could view this as a rather disrespectful retort from a granddaughter to a grandfather which could be hurtful to him. It is unlikely that C's retort would be considered emotional or psychological abuse.

43 As for the 26 November 2025 incident, C accepts that the Respondent did not engage her directly and did not do anything else other than placing the plate and his things down forcefully. Although she says he stared at her, it is not her case that he did so in a menacing or intimidating manner. C also accepts that this was a once-off experience.

44 Further, I did not think that C was placed in any emotional, psychological or mental harm that went beyond mere unhappiness. There is no

medical or other objective evidence to support such a finding. To the contrary, there was evidence showing C sitting comfortably in the living room watching television when the Respondent was home following the incidents. Whilst C explained that this was because the Respondent was in his room, the Respondent remained in the house and could come out at any time. There was no material difference whether he was in his room or anywhere else in the house. C also testified that she had voluntarily said goodbye to the Respondent before she left on a trip to Batam and this took place after the application was filed. There was no expedited order in force issued for C's protection at the material time.

45 Finally, this application was initiated by the Applicant rather than C. As the Applicant testified, she decided to file the application after she did "some research" following the 29 October 2025 incident. C also testified that it was the Applicant who suggested filing the application and she agreed to it.

46 On the whole, I did not think that there was any emotional or psychological abuse committed by the Respondent on C.

47 For completeness, the Applicant and C alluded to another incident belatedly at trial several years ago when C was 12. However, that incident was not part of the application nor raised in A1 and had to be disregarded. Even if that incident was considered, it arose out of an unparticularized disagreement between C and the Respondent. It is not disputed that no physical hurt was caused by the Respondent on C. The fact that the Applicant omitted this in the application form and in her documents demonstrates that it was not a notable incident.

48 For these reasons, the first requirement for issuing a PPO was not met.

Whether it is necessary to issue a PPO

49 This was a case which would also fail on the second requirement of necessity.

50 As necessity has always been a legal requirement even under the pre-amendment family violence provisions, I consider the case authorities on necessity to remain relevant. As the Court noted in *WSD v WSE* and another matter [2024] SGFC 1 at [37], necessity is a statutory requirement which serves as a safeguard against unnecessary intervention by the Court. Further, the PPO is not intended to be punitive in nature (see *WSD* at [40]) to punish a family member for his or her mistakes.

51 Determination of necessity also involves a risk assessment on the likelihood of the perpetrator committing family violence against the victim in future (See *XYD v XYE* at [2026] SGFC 8 and *XFL v XFM* [2024] SGFC 103 at [19]). Thus, the court may not issue a PPO for one-off instances except possibly where the violence is serious. Ultimately, the court has to consider whether it is necessary to issue a PPO given the precise facts and circumstances of each case.

52 In the present case, the Respondent and the maternal grandmother have been living with the family and the grandchildren since C was born. The Respondent said that he has a long standing, caring relationship with C and has helped care for C and D. This was not denied by C.

53 C also recalled the close relationship with the Respondent, especially when she was young. She testified that the Respondent would take her to the playground, cycle and spend time together. They also used to have small talk

on a daily basis. She notably choked up when expressing regret over the change in the relationship between herself and the Respondent.

54 In this 14 years, there were no proven acts of violence. Even the recent two incidents can hardly be said to constitute family violence. It was plainly unnecessary to issue a PPO.

55 I therefore dismissed the application.

Costs

56 I ordered the Applicant to pay costs to the Respondent after hearing parties on their costs submissions.

57 As I noted above, the Applicant commenced these proceedings after doing “some research” about the PPO. She did not consider any other alternatives to address the single incident which happened on 29 October 2025. While I found that there was no malicious intent or collateral purpose on the Applicant’s part, the application itself was largely misconceived. The Respondent had to defend himself and incurred costs and expenses in doing so.

58 Whilst the statutory definition of family violence has rightly been expanded to address all forms of family violence, including emotional and psychological abuse, this does not mean that the court will readily grant a PPO, especially in circumstances where it is unnecessary to do so. On the other hand, where the legal requirements are met, the Court will not hesitate to step in to order a PPO for the protection or personal safety of victims.

Concluding remarks

59 C appears to be a child caught in between the divorce proceedings between her parents which has affected the relationships between the extended family members. During the trial, she appeared visibly emotional when she spoke about the deteriorating relationship with her grandfather. The Respondent testified that he regards C and her sister as his “bao-bei” or treasure.

60 I did not think that the relationship between C and the Respondent is irremediable. I urge both sides of the family to exercise restraint in their dealings with each other and seek therapeutic services such as counselling, if necessary. Ties of love and affection built up over years of familial relationship can endure beyond the immediate fog of acrimony and unhappiness.



Goh Kiat Yi
District Judge



Applicant in-person and unrepresented;
Muhammad Hasif (A.W. Law LLC) for the Respondent;
