

- (1) This judgment DOES need redaction.
- (2) Redaction HAS been done.

Kow Keng Siong  
District Judge  
26 March 2025

**IN THE FAMILY JUSTICE COURTS OF THE REPUBLIC OF SINGAPORE  
[2025] SGFC 35**

SS No. 1299 of 2024

Between

XKJ

And

XKK

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**JUDGEMENT**

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***Family Law** – Family violence – Order for protection – Wife seeking protection for her child and herself – Whether Husband had committed family violence*

***Evidence** – Admissibility of evidence – Whether family violence allegedly committed after the filing of application for personal protection order is admissible for consideration*

***Evidence** – Burden of proof – Wife making generic and bare allegation of family violence committed by Husband – Whether Wife has “proved” that family violence was committed – Factual findings of “proved”, “disproved”, and “not proved” under s 3(3) to s 3(5) of the Evidence Act 1893*

***Family Law** – Family violence – Order for protection – Whether protection order is necessary – Relevant considerations*

***Evidence** – Admissibility of evidence – Whether medical report by Child Guidance Clinic may be considered in deciding whether protection order is necessary*

***Words and Phrases** – “Any force lawfully used” – Section 64 Women’s Charter 1961*

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**XKJ**

**v**

**XKK**

**[2025] SGFC 35**

Family Court – SS No. 1299 of 2024

District Judge Kow Keng Siong  
5 November 2024; 8 & 21 January, 25 March 2025

26 March 2025

**District Judge Kow Keng Siong:**

### **Introduction**

1 Section 64 of the Women’s Charter (“**Charter**”) defines the types of acts that can constitute “family violence”. The definition excludes two types of acts from being family violence. The first is where the force is “lawfully used in self-defence” (“**self-defence exception**”). The second is where the force is “lawfully used by way of correction towards a child below 21 years of age” (“**correction exception**”). The present case provides an opportunity to examine the scope of these two exceptions.

2 The applicant (“**Wife**”) and the respondent (“**Husband**”) were married in 2014. They have two sons – 10 years old (D.O.B.: XX August 2014) (“**1<sup>st</sup> Son**”) and eight years old (D.O.B: XX October 2016) (“**2<sup>nd</sup> Son**”).

3 On 7 July 2024, the Wife left the matrimonial home (“**Flat**”) with the 1<sup>st</sup> Son following a domestic incident. On 10 July 2024, she filed a complaint for a personal protection order (“**PPO**”) for the 1<sup>st</sup> Son and herself. (“**Complaint**”) In the Complaint, the Wife alleged that the Husband had committed family violence on various occasions for the past four years, with the most recent incident being on 7 July 2024.

### **Preliminary issue**

#### ***Husband’s objection***

4 Before proceeding further, I wish to deal with a preliminary issue.

(a) In her affidavit of evidence-in-chief<sup>1</sup> (“**AEIC**”) and testimony, the Wife alleged that after she had filed her PPO application on 10 July 2024, the Husband committed further family violence on 11 July and 5 August 2024.

(b) The Husband objected to evidence of the 11 July and 5 August incidents being considered at the trial. He gave three reasons for taking this position. *First*, he submitted that “the Wife is bound by the four corners of her Complaint” and that she should not refer to matters not raised in the Complaint. To support his submission, the Husband referred to my observation in *XEP v XEQ* [2024] SGFC 95 (“**XEP**”). In that case, I had held that “the evidence in a PPO trial should be confined

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<sup>1</sup> The AEIC is dated 19 September 2024.

to those that support or rebut the allegations of family violence contained *in an applicant's Complaint*" [emphasis added].<sup>2</sup> *Second*, the Husband submitted that before receiving the Wife's AEIC, he did not know that she would be raising the 11 July and 5 August incidents. As such, he did not have the opportunity to address them in his AEIC.<sup>3</sup> *Finally*, the Husband was merely brought through the Wife's allegations regarding the two incidents during his cross-examination – he was not invited to give his account of what had happened for these incidents.<sup>4</sup>

***XEP is distinguishable***

5 In my view, the Husband's reliance on *XEP* to exclude evidence of the 11 July and 5 August incidents at the trial is misplaced.

(a) It is useful to set out (in full) my observations in *XEP* at [15(a)]:

*As a starting point*, the evidence in a PPO trial should be confined to those that support or rebut the allegations of family violence in the applicant's complaint. *If there are good reasons to depart from this starting position, then notice of the further evidence must be given as soon as possible*. This is because *it is important that the other party (i) is not taken by surprise and (ii) has sufficient opportunity to respond to the further evidence at the trial ....*

[emphasis added]

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<sup>2</sup> Respondent's Written Closing Submissions dated 4 March 2025 at [4].

<sup>3</sup> Respondent's Written Closing Submissions dated 4 March 2025 at [5].

<sup>4</sup> Respondent's Written Closing Submissions dated 4 March 2025 at [6].

From the above, I clearly did not rule out the possibility of admitting evidence of incidents of family violence allegedly committed after a complaint is filed (“**Other Incidents**”).

(b) It is also important to highlight the context in which the observations in [5(a)] above had been made. In *XEP*, the applicant had requested to admit evidence of Other Incidents *while cross-examining the respondent*. No advance notice was given of this. I disallowed the applicant’s request as it was highly prejudicial to the respondent: *XEP* at [15(b)] and [15(c)].

### ***Key considerations***

6 In my view, the following considerations are relevant in deciding whether to allow evidence of Other Incidents to be admitted in a trial.

(a) A court should not put on blinkers, inflexibly shut out evidence of family violence, and require a victim of such violence to go through the trouble of filing a further PPO application – just because the violence allegedly occurs after the initial PPO application is filed.

(b) At the same time, the respondent’s right of having due notice of the allegation made against him/her and to prepare his/her response should also be preserved.

(c) As I have made clear in *XEP*, to strike a balance between the two considerations above, the admission of evidence of the Other Incidents is permissible only if “the other party (i) is not taken by surprise and (ii) has sufficient opportunity to respond to the further evidence at the trial”.

***Ruling on preliminary issue***

7 Returning to the present case, I am of the view that it is appropriate to admit evidence of the 11 July and 5 August incidents at the trial.

(a) *First*, the Husband had ample notice that the Wife was going to refer to these incidents at the trial. This is because about *two months before* the trial began, the Wife had already set out in detail her allegations regarding the 11 July and 5 August incidents in her AEIC.<sup>5</sup> Unlike the respondent in *XEP*, the Husband was not taken by surprise.

(b) *Second*, the Husband did not raise any objection to the Wife referring to the two incidents during the trial.

(c) *Finally*, the Husband had sufficient opportunity to respond to the Wife's allegations regarding two incidents – either by adducing rebuttal evidence during his examination-in-chief or by cross-examining her about them. He did not do either.

**Wife's burden of proof**

8 Having addressed the preliminary issue, I will now touch on the Wife's burden of proof at the trial. To succeed in her PPO application, she must prove two things on a balance of probabilities. *First*, she must prove that the Husband had committed or is likely to commit family violence against the 1<sup>st</sup> Son and herself. *Second*, she must also prove that a PPO "is necessary" for their protection.

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<sup>5</sup> See the Complainant's Affidavit dated 19 September 2024 at [85] to [88] and at [90] to [94] respectively.

**Did the Husband commit family violence**

9 I will now assess whether the Wife has discharged her burden of proof.

***Random acts of physical violence***

*The Wife's case*

10 It is the Wife's case that for more than a year, the Husband had hit the 1<sup>st</sup> Son for no good reason. He would do so by using, e.g., an exercise stick, a cane, a belt, a hanger, and heavy books. He would also hit the child for being fidgety while doing his work.<sup>6</sup> The Wife did not give any other details, such as the dates, regarding these instances of violence.

*The Husband's case*

11 The Husband denied the Wife's allegations.

*My decision*

12 I find that the Wife has "not proved" her allegations in [10] above.

- (a) *First*, the allegations of family violence are too generic and bare. It is not clear in what context the Husband had allegedly committed the violence. Such context is necessary, for instance, (i) to enable the Husband to properly respond to these allegations, (ii) to determine whether the correction exception is applicable, and (iii) to assess whether the Wife's allegations are credible and reliable.

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<sup>6</sup> Wife's affidavit dated 19 September 2024 at [25] and [30].

(b) *Second*, and in any event, it appears that the Wife did not personally witness many of the alleged incidents of violence.<sup>7</sup>

13 To be clear, the finding in [12] above does not mean that (a) the Wife’s allegations have been “proved” to be false or (b) the Husband has “disproved” them. For a discussion on the concepts of “proved”, “disproved”, and “not proved”, see s 3(3) to s 3(5) of the Evidence Act 1893; *Loo Chay Sit v Estate of Loo Chay Loo* [2010] 1 SLR 286 at [18] to [21]; *R Cooperatieve Centrale Raiffeisen-Boerenleenbank BA (trading as Rabobank International), Singapore Branch v Motorola Electronics Pte Ltd* [2011] 2 SLR 63 at [35].

### ***March 2024 – Tutoring incident***

#### *The Wife’s case*<sup>8</sup>

14 I now turn to an alleged incident of family violence where the Wife has provided more background details.

15 According to the Wife, sometime in March 2024, while attending to the 2<sup>nd</sup> Son in the children’s bedroom, she heard the Husband speaking loudly. He had apparently lost his temper while tutoring the 1<sup>st</sup> Son. On leaving the bedroom to investigate, the Wife saw the Husband (a) berating the child, (b) punching and kicking him all over his body (including his face, abdomen, legs and back), and (c) striking the child’s head with hardcover books and rulers. The Husband stopped the violence when the Wife intervened. However, when she returned to the children’s bedroom, he continued to berate and hit the 1<sup>st</sup> Son. The Husband stopped when the Wife intervened again – but would resume

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<sup>7</sup> Record of Proceedings for 5 November 2024 at page 52 (line 23) to page 53 (line 6).

<sup>8</sup> Wife’s affidavit dated 19 September 2024 at [25] and [30].

the violence after she had left. There were more than 20 times of such interventions, and the entire incident lasted for about 15 minutes.

*The Husband's case*

16 The Husband denied the Wife's allegations. He submitted that her allegations should be disbelieved because there were several material discrepancies and gaps in her evidence.<sup>9</sup> These related to the following.

- (a) When did the incident allegedly occurred? The Wife had given conflicting accounts of when the incident had occurred: December 2023 (according to the Complaint) and March 2024 (according to the Wife's AEIC).
- (b) How was the family violence allegedly committed? In her AEIC, the Wife initially stated that the Husband had "punched and kicked" the 1<sup>st</sup> Son. In a later part of her AEIC, she stated that he had used hardcover books and rulers to hit the child's head.
- (c) Who had entered/left the room. The Wife had given two conflicting accounts as to the identity of the person who had entered and left the room. In her AEIC, she claimed that she was the one. In cross-examination however, she testified that it was the 1<sup>st</sup> Son.<sup>10</sup>
- (d) Was the Wife hit? During cross-examination, the Wife testified that the Husband had hit her during the incident. There is no such allegation in the Complaint or her AEIC.

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<sup>9</sup> Respondent's Written Closing Submissions dated 4 March 2025 at [19] to [25].

<sup>10</sup> Record of Proceedings for 5 November 2024 at page 72 (lines 13 to 27).

(e) The Wife’s alleged reaction to the violence. According to the Husband, it is incredible that for more than 20 occasions of assault on the 1<sup>st</sup> Son, the Wife “did nothing practical to stop” the Husband “other than to chide [him]”.

*My decision*

17 In my view, the Wife has “not proved” her allegations in [15].

(a) In her AEIC, the Wife stated that she had left the children’s bedroom for about 20 occasions to intervene in the Husband’s repeated abuse of the 1<sup>st</sup> Son.<sup>11</sup> This is a key feature of her allegation regarding how the alleged abuse had occurred.

(b) However, during cross-examination, the Wife changed her evidence. She testified that it was the 1<sup>st</sup> Son – not her – who had gone “in and out of the room 20 times”. She maintained the same position during re-examination.<sup>12</sup>

(c) In my view, the discrepancy in the Wife’s evidence is material. Arising from the discrepancy, it is unclear to me what had really occurred at the material time.

***23 March 2024 – Tooth extraction incident***

18 I turn to the Wife’s next allegation of family violence. This incident took place in the night of 23 March 2024.

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<sup>11</sup> Complainant’s Affidavit dated 19 September 2024 at [70].

<sup>12</sup> Record of Proceedings dated 8 January 2025 at page 72 (line 30) to page 73 (line 7).

*The Wife's case*<sup>13</sup>

19 According to the Wife, the Husband lost his temper when she questioned his decision to send the 1<sup>st</sup> Son for tooth extraction. Specifically, he (a) raised his fist at her, (b) shouted that the date for the extraction could not be changed, (c) told her to follow his rules as she was staying in his house, and (d) threw a laundry basket (filled with laundry) at her. The basket hit the Wife's stomach and thigh area. She fled into her bedroom and locked the door for safety.

*The Husband's case*

20 The Husband denied the Wife's allegations in [19] above.<sup>14</sup> He submitted that these allegations should be disbelieved.<sup>15</sup>

(a) Wife was not fearful of the Husband. According to the Husband, the following events had occurred *before* the alleged violence: (i) Prior to 11.41 pm, he had discussed with the Wife about the 1<sup>st</sup> Son's teeth issue; (ii) At 11.41 pm, the Wife texted him, "*you never send yet*"; and (iii) At 11.42 pm, he sent her an image of the X-ray of the child's teeth. According to the Husband, the fact that the Wife had asked him for the X-ray showed that she was not fearful of him at the material time.

(b) Failure to seek help. The Husband highlighted the Wife's evidence that after being hit by the laundry basket, she felt that "[her] life was in danger".<sup>16</sup> According to the Husband, it was incredible that

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<sup>13</sup> Wife's affidavit dated 19 September 2024 at [60] to [66].

<sup>14</sup> Record of Proceedings dated 21 January 2025 at page 24 (line 9 to line 22).

<sup>15</sup> Respondent's Written Closing Submissions dated 4 March 2025 at [13] to [18].

<sup>16</sup> Complainant's Affidavit dated 19 September 2025 at [65].

despite being fearful of her life, the Wife did not (i) call for the Police or ambulance or (ii) go for a medical check-up.

*My decision*

21 I am not persuaded by the Husband's submissions.

(a) *First*, I fail to see why the mere fact that the Wife had sent the message at 11.41 pm to him proves that she was not fearful of him *at a later point in time* when he threw the laundry basket at her.<sup>17</sup>

(b) *Second*, the mere fact that the Wife did not seek Police help or medical attention at the material time does not undermine her evidence of what the Husband had done. It is well established that victims of violence do not always behave in a set or rational manner. It is unreasonable to dissect the Wife's reaction on the night of 23 March 2024 and pass judgement on what she should or should not have done based on hindsight.

(c) *Finally*, and in any event, I find the Wife's act of fleeing to her bedroom and locking the door after the Husband had thrown the laundry basket at her to be a reasonable response to his violence.<sup>18</sup>

22 In my view, the Wife is probably telling the truth regarding her evidence in [19] above.

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<sup>17</sup> Record of Proceedings dated 8 January 2025 at page 52 (line 24 to line 30); page 58 (line 1) to page 59 (line 19).

<sup>18</sup> Record of Proceedings dated 8 January 2025 at page 38 (line 27) to page 39 (line 6).

(a) It is the Husband's case that he was "upset" with the Wife at the material time. This is because she had chosen to raise the tooth extraction issue at close to midnight and thus disrupted his sleep.<sup>19</sup>

(b) It is highly unlikely that the Wife had fabricated her evidence for the purpose of building a case to support a PPO application. The incident had occurred some *four months before* she filed the application. All these show that the Wife did not intend to make an issue out of the incident at the material time.

(c) If the Wife had wanted to frame the Husband, she could easily have made a simpler allegation against him, e.g., that he had slapped her. She did not. Instead, she alleged that he had thrown a laundry basket at her. In my view, the unusual way in which the family violence was committed lends credibility to her claim.

### ***7 July 2024 – Triggering incident***

23 Next, I come to the incident that triggered the Wife's PPO application.

#### *The Wife's case*<sup>20</sup>

24 On 7 July 2024, the Wife was attending to the 2<sup>nd</sup> Son in the children's bedroom. At one point, she began noticing that the 1<sup>st</sup> Son was extremely fidgety and was walking between the living room and his bedroom many times for more than one hour. Suddenly, she heard the Husband shouting angrily and the 1<sup>st</sup> Son crying in the living room.

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<sup>19</sup> Record of Proceedings dated 8 January 2025 at page 44 (line 3 to line 22); page 48 (line 12); page 49 (line 7 to line 11).

<sup>20</sup> Wife's affidavit dated 19 September 2024 at [43] to [59].

25 On leaving the bedroom to investigate, the Wife saw the Husband forcefully slapping the 1<sup>st</sup> Son's head near to the ear.<sup>21</sup> She told him to stop. After he agreed,<sup>22</sup> she returned to the children's bedroom to tend to the 2<sup>nd</sup> Son.

26 Later, the Wife heard the Husband scolding the 1<sup>st</sup> Son again. She messaged him at 10.26 pm and threatened to call the Police if he hit the child's head again. The Wife then heard a loud bang that sounded like the Husband smashing the table. Moments later, he was at the children's bedroom. The Husband angrily banged the door, aggressively waved his fist at her, and shouted, "*Go ahead and call the police if you can!*"

27 The Wife told the Husband that his actions had gone beyond disciplining the 1<sup>st</sup> Son. On noticing that she was making a *video recording* on her phone, the Husband knocked the phone out of her hand and punched her chest twice. The Wife called the police.

#### *The Husband's case*

28 The Husband admitted that he had scolded the 1<sup>st</sup> Son but denied the rest of the Wife's allegations. His account of the incident is as follows.

- (a) At the material time, the Husband had reminded the 1<sup>st</sup> Son to prepare for school the following day and had reprimanded him for making negative remarks and showing poor attitude. The child then showed his displeasure, used disrespectful remarks against the Husband, and cried to get the Wife's attention.

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<sup>21</sup> Record of Proceedings for 8 January 2025 page 16 (line 4 to line 16).

<sup>22</sup> Record of Proceedings for 8 January 2025 page 19 (line 9 to line 15).

(b) When the Wife arrived, she sided with the 1<sup>st</sup> Son instead of correcting him. She also sent the Husband messages threatening to call the Police. He told her not to interfere if she was not going to help to correct the 1<sup>st</sup> Son's attitude towards him. The Wife turned nasty, pointed her phone at him, and eventually called the Police.

(c) After the Police arrived, the Husband said that he did not want the Wife in the Flat and asked for her house keys and the children's passports. The Wife surrendered these items and left thereafter with the 1<sup>st</sup> Son.

29 According to the Husband, the Wife's evidence should be disbelieved for the following reasons.<sup>23</sup>

(a) Her evidence that she had merely cautioned him against further hurting the 1<sup>st</sup> Son and then returned to soothe the 2<sup>nd</sup> Son to sleep is incredible.

(b) The Wife deleted the messages that she had sent to him that night. In these messages, she had threatened to call the Police if he continued to hit the 1<sup>st</sup> Son. Her explanation for deleting these messages – because she was afraid that he might become angry on seeing them – is inconsistent with the fact that she was brave enough to take a video recording of him at the material time.

(c) The Wife had deleted the messages “to destroy evidence which may be detrimental to her false allegation of violence against the Husband”.

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<sup>23</sup> Respondent's Written Closing Submissions dated 4 March 2025 at [8] to [12].

- (d) The 1<sup>st</sup> Son was not found to have suffered any bleeding on his body when examined by a medical officer at the Flat.
- (e) The Wife did not go for medical check-up to show that she had suffered injuries to her chest.

*My decision*

Whether the Husband had committed family violence

30 I am not persuaded by the Husband’s submissions.

(a) Regarding the submission in [29(a)] above, the Wife explained that she had returned to the 2<sup>nd</sup> Son only after the Husband had agreed not to use further violence on the 1<sup>st</sup> Son.

(b) As for the submission in [29(b)] above, I do not see anything incongruous between (i) the Wife’s reason for deleting the messages and (ii) her *subsequent* act of taking a video of the incident. It bears highlighting that she began to record the video *only after an escalation* in the incident: see [26] and [27].

(c) I find the submission in [29(c)] above to be disingenuous. If there is anything in the deleted messages that discredits the Wife’s case, then I would have expected the Husband – being the recipient of these messages – to have testified about their contents. He did not do so.

(d) As for the submission in [29(d)], the mere fact that the 1<sup>st</sup> Son did not suffer from any visible bleeding is neither here nor there. After all, it is the Wife’s evidence that the Husband had hit the child’s head. She did not testify that he had cut the child with an instrument.

- (e) As for the submission in [29(e)], the fact that the Wife did not go for medical check-up does not prove that she was not punched.

31 I find the Wife's evidence that the Husband had committed family violence on the night of 7 July 2024 to be truthful. I say this because her evidence is consistent with the undisputed and objective evidence.

*Events before the video recording started*

- (a) It is common ground that the Husband was angry with the 1<sup>st</sup> Son and the Wife at the material time. It is also not disputed that the parties had a disagreement when the Wife intervened to stop him from punishing the child.

- (b) The Wife's account regarding the events that night is detailed, textured, and clear.<sup>24</sup>

- (c) On the other hand, the Husband's account is highly unsatisfactory.

- (i) He testified that the Wife had assaulted him during the incident. He did not mention this in his AEIC.

- (ii) Further, the Husband gave incoherent and inconsistent responses during cross-examination when questioned about the details of his case. He struggled to describe in his own words what the Wife had done that night.<sup>25</sup>

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<sup>24</sup> Wife's affidavit dated 19 September 2024 at [43] to [59]; Record of Proceedings for 8 January 2025 at page 13 (line 22) to page 30 (line 15).

<sup>25</sup> Record of Proceedings for 21 January 2025 at page 10 (line 21) to page 18 (line 21).

*Events after the video recording started*

(d) From her video recording,<sup>26</sup> the Wife can be heard accusing the Husband three times of having hit the 1<sup>st</sup> Son's head and warning him that the child could "die" from such an assault. The Husband did not deny these repeated accusations. Instead, he said that he knew what he was doing. When asked why he had hit the child's head, the Husband responded that he was teaching him about "respect".

(e) The Husband can be heard in the video recording speaking in an aggressive manner. On the other hand, the Wife's tone was measured but firm.

(f) Towards the end of the video recording, the Husband could be seen angrily reaching out towards the Wife, saying "You stop it huh", and swiping the handphone away.

(g) It is not disputed that the Wife had called the Police that night. There is no reason for her to do so if the Husband had merely *scolded* the 1<sup>st</sup> Son for being disrespectful. In my view, it is more probable that the Wife had called the Police because he had assaulted the child and her.

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<sup>26</sup> The recording is at the Complainant's Affidavit dated 19 September 2024 at Tab 13. For the transcript of the recording, see the Wife's Supplementary Affidavit at pages 33 and 34.

Whether the correction exception is applicable

32 Having found that family violence was committed on the 1<sup>st</sup> Son, the next question is whether the Husband’s actions come within the correction exception.<sup>27</sup> At this juncture, it is useful to set out the scope of this exception.

*The exception*

(a) Section 64 of the Charter provides that family violence “does not include any *force lawfully used ... by way of correction* towards a child below 21 years of age”. (emphasis added)

(b) On a plain reading –

(i) The correction principle applies only when the family violence involves a use of force. The exception does *not* apply where the family violence involves (1) placing a child in fear of hurt, (2) confining or restraining the child against his/her will, or (3) continual harassment of the child.

(ii) A respondent to a PPO application must satisfy two requirements before the correction exception is applicable. *First*, he/she must show that the force was used as a means of correcting a child below 21 years of age. *Second*, the respondent must also show that the force had been “lawfully used”.

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<sup>27</sup> Respondent’s Written Closing Submissions dated 4 March 2025 at [32] to [36].

*Reason for the use of force*

(c) The first requirement focusses on the *purpose/reason* for the use of force – it must be to correct a child’s behaviour and attitude. In my view, a use of force for corrective purpose will be “lawful” (second requirement) *if it is intended to benefit the child* – i.e., to inculcate in the child the appropriate way to conduct himself/herself (i) as a person and (ii) in his/her relationship with others.

(d) Accordingly, if the use of force is *not* for the child’s benefit, it will fall outside of the correction exception and thus constitute family violence. Some examples of this are where force is used primarily because –

(i) The parent is angry with the child or his/her behaviour.

(ii) The parent wants to vent his/her frustration on matters unrelated to the child. See e.g., *TCV v TCU* [2015] SGFC 3 (“*TCV*”) at [49], [51] and [57] (Where the parent slapped and caned the child because she blamed the child for being the cause of her unhappiness with her (the parent’s) father); *VYB v VYA* [2021] SGFC 121 (“*VYB*”) at [38] (Where the mother hit the child because she was angry that the child’s father had thrown away the cane).

(iii) The parent is under financial, work or other forms of stress. In the context of offences against young victims, it has been held that “the frustrations faced by a parent or a caregiver due to his or her difficult personal circumstances can *never* justify or excuse the abuse of such victims”: *Public Prosecutor*

*v BDB* [2018] 1 SLR 127 at [75]. In my view, this observation is equally relevant in the application of the correction exception.

(iv) The parent wants to assert power or control over the child: see e.g., *TCV* at [13] and [70].

(e) How does one determine whether a parent’s use of force is for the child’s benefit? To answer this question, one can consider the following:

(i) What has the child done that warrants corrective action?

(ii) What has the parent said before, during and after force is used on the child? For instance, has the parent provided a reasonable explanation for the punishment: see e.g., *WSD v WSE* [2024] SGFC 1 at [46]? Is the use of force accompanied by derogatory remarks: see *VYB* at [37] (Where the court found that the mother’s utterances at her child who had soiled his clothes – that he was a “stupid idiot” and an “animal”, and threats to “kick [him] outside”, to hit him until “black eye” and “leg pains got blood”, to cut off his penis, and to hit him 100 times if he continued to protest – revealed that her use of force was primarily out of anger and was not for correction).

*Manner the force is used*

(f) To come within the correction exception, the Charter requires the force to have been “lawfully used”. In the context of s 64, the word “lawfully” can be understood as using force “*in a way* that is allowed or recognised by law” (emphasis added).<sup>28</sup> The word – which is an adverb

<sup>28</sup>

See e.g., <https://www.oxfordlearnersdictionaries.com>

and is synonymous with “properly” and “reasonably”<sup>29</sup> – thus describes the *manner* the force is used.

(g) Clearly, the *excessive* use of force is “improper” and “unreasonable” – and thus “unlawful”. This is in line with local jurisprudence on the correction exception as well as the following observations in *R v Hopeley* [1860] EW Misc J73 (“*Hopeley*”):

By the law of England, a parent ... may for the purpose of correcting what is evil in the child inflict *moderate and reasonable* corporal punishment, always, however, with this condition, that it is moderate and reasonable. If it be administered for the gratification of passion or of rage, or if it be *immoderate and excessive in its nature or degree*, or if it be protracted beyond the child's powers of endurance, or with an instrument unfitted for the purpose and calculated to produce danger to life or limb; in all such cases the punishment is *excessive, the violence is unlawful ...*

[emphasis added]

(h) Various considerations can assist in determining whether the use of force is excessive or reasonable. They include the following.

(i) Is the use of force *measured* – or is it random, unrestrained, and/or gratuitous? Is force used for a prolonged period? See e.g., *VYB* at [14(b)] (Held: Punching is unacceptable *per se*); *BJJ v Child Protector* [2013] SGJC 3 at [39] (Held: Acts of kicking a child’s head and body, hitting the head with a bunch of keys, and hitting the face and causing a nose bleed automatically went beyond reasonable disciplining); *Lau Siao*

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<sup>29</sup> See e.g., <https://dictionary.cambridge.org>

*Hwee Rosana v Wong Chew Kong*, SS 18/1998, cited in Practitioner’s Library: Family and Juvenile Court Practice (LexisNexis, 2008) at pp 78-79 (Held: Family violence established as the parent had hit the child with a toy violin until it broke); *CSW v CSX* [2024] SLR(FC) 204 (“*CSW*”) at [70] (Held: Light tap on a child’s head to correct his/her rude and inattentive behaviour came within the correction exception).

(ii) Has the parent used an *instrument* to inflict the force? If so, is the instrument unfitted for the purpose of discipline? See e.g., *Hopeley* (discussed at [32(g)]); *CSW* (discussed at [32(h)(i)] above); *TLZ v TLY* [2016] SGFC 37 (“*TLZ*”) at [53] (Held: Using a belt to hit a four-year-old child on the leg is not an acceptable form of correction). Is the instrument likely to endanger the child’s safety and health? Where a cane is used, it has been held that whether the correction exception is applicable depends on the number and extent of bruises caused: *BHR v Child Protector* [2013] SGJC 2 at [50].

(iii) Is the amount of force used *proportionate to the child’s misbehaviour*? See *AVF v AVH* [2011] SGDC 363 at [30]; *TLZ* at [53] (Held: Using a belt to hit a child for a relatively minor misbehaviour (not greeting the parent) is not an acceptable form of correction).

(iv) The *child’s age and personal characteristics* are also relevant considerations in assessing whether the use of force is excessive. The type and manner of sanction on the child must be age appropriate. For instance, the use of force that is beyond the

child’s power of endurance is unreasonable: *Hopeley* (discussed at [32(g)]). Punishment is also likely to be found to be unreasonable if (1) it is beyond the child’s level of comprehension or (2) the child is unable to change the behaviour which the parent seeks to correct. See e.g., *VYB* at [45] (Held: The mother’s punishments and threats did not commensurate with the six-year-old child’s maturity as he was left confused, and he lacked the faculties to modify his behaviour of soiling his clothes).

(v) Finally, the *effect* of the force on the child is also a relevant consideration. It is difficult to see how the use of force can be in a child’s interest if its detriment outweighs its benefit. This is especially so where the force causes the child unnecessary pain, suffering, or trauma: *TCV* at [14].

33 Applying the above principles to the present case, I find that the Husband has failed to prove that his act of forcefully hitting the 1<sup>st</sup> Son’s head near to the ear comes within the correction exception.

*Reason for the use of force*

(b) It is the Husband’s evidence that the 1<sup>st</sup> Son had made negative and disrespectful remarks against him and had shown “poor attitude”.<sup>30</sup> From the video recording, the Husband can be heard saying repeatedly that he was “teaching” the child how to “respect” his parents. *It is not clear what exactly the child had done that is “disrespectful”*. If the Husband had hit the child’s head simply to assert his power and control

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<sup>30</sup> Husband’s Affidavit dated 22 August 2024 at [6].

over the child, then this is not for the child’s benefit: see [32(d)(iv)] above.

*Manner the force is used*

(c) In the video recording, the Wife had repeatedly warned the Husband that by hitting the 1<sup>st</sup> Son’s head, he could cause the child (then about 10 years old) “a lot of problems” – including “killing him”. She had also highlighted that the Husband was of a much bigger built than the child and that his hitting carried a lot of “power”. The Husband did not pay heed. Instead, he responded angrily that he “will teach [the child] the way it is” and that he knew what he was doing.

(d) Finally, given that the Husband had failed to show on what exactly the 1<sup>st</sup> Son had done that is “disrespectful”, there is no evidence to show that his act of hitting the child’s head forcefully is a measured and proportionate response to the child’s (mis)behaviour.

***11 July 2024 – Metal gate incident***

*Undisputed facts*

34 I now come to the next incident of alleged family violence.

35 This incident occurred after the Husband had evicted the Wife and 1<sup>st</sup> Son had been evicted from the Flat. On 11 July 2024, the Wife had returned to the Flat unannounced to retrieve her personal belongings and those of the 1<sup>st</sup> Son. On arriving at the Flat, the Husband opened the door.

(a) According to the Wife, the Husband attempted to forcibly push her out on seeing her. She became stuck between the door and the

doorframe of the metal gate. He then deliberately pushed the door even harder, causing it to press against her left thigh and chest (sternum) area. The Wife eventually managed to extricate herself from between the door and the doorframe.<sup>31</sup> As a result of the incident, the Wife suffered visible injuries to her left palm and left thigh.<sup>32</sup>

(b) According to the Husband, the Wife had attempted to force her way into the Flat when he opened the door. He held the main door firm and told her that she ought to have given advance notice before coming to the Flat. The Wife proceeded to stick one of her legs through the door and shouted, “Domestic violence”. The Husband eventually succeeded in closing the door after a struggle for 10-15 minutes. According to the Husband, any hurt caused to the Wife was self-inflicted.<sup>33</sup>

*Husband had used force*

36 Based on the above facts, the Husband had clearly used force on the Wife at the material time – by forcefully closing the door on her while she was attempting to enter the Flat.

*Issue to be determined*

37 The Husband justified his actions by claiming that he was acting in “self-defence” when the Wife attempted to force her way into the Flat – as she “must

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<sup>31</sup> Complainant’s Affidavit dated 19 September 2024 at [85] to [87].

<sup>32</sup> See photos in the Complainant’s Affidavit dated 19 September 2024 at pages 131 and 132.

<sup>33</sup> Husband’s Affidavit dated 22 August 2024 at [13] to [16].

have been fully aware that she has no entitlement to enter the [Flat] without [his] prior consent.<sup>34</sup>

*My decision*

Applicable principles

38 Given the Husband’s case, it is necessary for me to consider whether the self-defence exception applies to him. According to s 64 of the Charter, a use of force does not amount to family violence if it is “*lawfully* used in self-defence”. In other words, the Husband must prove that the circumstances and the way he had used force against the Wife is *permitted by law*.

39 Interestingly, the Penal Code 1871 (“**Penal Code**”) contains provisions regulating when the use of force for the purpose of private defence is legally permissible. These provisions – to the extent that they are relevant in the context of family violence – stipulate the following conditions.

- (a) A person has the right of private defence in *only two situations*, namely –
  - (i) To defend his *own body* and the *body of any other person against any offence* affecting the human body: s 97(a) of the Penal Code; and
  - (ii) To defend any *property* against any act which is an offence falling under the definition of theft, mischief, or criminal

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<sup>34</sup> Respondent’s Written Closing Submissions dated 4 March 2025 at [37].

trespass, or which is an attempt to commit such offences: s 97(b) of the Penal Code.

(b) The *exercise* of the right of private defence, where it arises, is subject to certain limits.

(i) *One*, it does not extend to the inflicting of more harm than it is reasonably necessary in the circumstances: s 98(1) of the Penal Code.

(ii) *Two*, there is no right of private defence where there is reasonable opportunity to have recourse to the protection of a public authority in the circumstances: s 98(2) of the Penal Code.

(iii) *Three*, in the case of the right of private defence of the *body*, this right –

(1) Starts as soon as the defender reasonably believes that there is danger to the body arising from any act which is an offence against the human body or an attempt or a threat to commit the offence, though the offence may not have been committed: s 101(1) of the Penal Code.

(2) Continues as long as the defender believes that the above danger persists: s 101(2) of the Penal Code.

(iv) *Four*, in the case of the right of private defence of property against *theft*, this right –

(1) Starts when the defender reasonably believes that there was a danger to property arising from any act which is an offence falling under the definition of theft,

mischief or criminal trespass, or which is an attempt to commit such an offence: s 104(1) of the Penal Code.

(2) Ends in three situations. First, when the offender has retreated with the property. Second, when the assistance of a public authority is obtained. Finally, when the property has been recovered: s 104(2) of the Penal Code.

(v) *Lastly*, the right of private defence of property against *criminal trespass* or *mischief* continues as long as the offender continues in the commission of criminal trespass or mischief: s 104(4) of the Penal Code.

40 In my view, the above conditions placed by the Penal Code on the exercise of the right of private defence should equally apply when one considers whether force has been “lawfully used in self-defence” in the context of family violence cases. A contrary view will mean that a person may be absolved of having committed family violence pursuant to the self-defence exception under the Charter – but can still be held criminally liable under the Penal Code because he falls outside of the private defence exception. Such an anomalous and absurd result cannot be right. Parliament is presumed to act consistently.

#### Self-defence exception is not applicable

41 Applying the considerations in [39] above, I find that the Husband’s act of forcefully closing the door on the Wife while she was attempting to enter the Flat falls outside of the self-defence exception.

(a) *First*, his use of force does not come within either of the two situations stated in [39(a)] above.

(b) *Second*, and for completeness, I find that the Wife’s attempt to enter the Flat does not constitute “criminal trespass” as defined in s 441 of the Penal Code. This is because she clearly did not have the “intent to commit an offence or to intimidate, insult or annoy” the Husband at the material time. I say this because the Wife had pressed the doorbell for him to open the door.<sup>35</sup> She would not have announced her arrival in such a manner if she had a sinister intent at the material time. Furthermore, the Wife’s intention of entering the Flat was for the innocent purpose of retrieving her personal belongings. The Husband did not dispute this evidence.

(c) *Finally*, the Husband’s position that the Wife had “no entitlement to enter the [Flat] without [his] prior consent” is clearly misconceived.

(i) The Charter clearly stipulates that any asset acquired during marriage by one party to the marriage is “matrimonial asset” to which the other party can have a share: s 112(1) and (10). In the present case, the Husband had acquired the Flat *during* the parties’ marriage.<sup>36</sup> Furthermore, he had also intended

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<sup>35</sup> The Husband’s Affidavit dated 22 August 2024 at [14].

<sup>36</sup> The parties were married in 2014. The Flat was registered in the Husband’s name in 2022: see Complainant’s Affidavit dated 19 September 2024 at page 35.

the Flat to be matrimonial asset.<sup>37</sup> This means that the Wife has the right to enter the Flat.

(ii) Apart from family law, the Wife clearly also has a right to retrieve her belongings from the Flat. If the Husband unlawfully interferes with such a right, he can be liable for the tort of conversion.

### ***5 August 2024***

#### *The incident*

42 Finally, I come to the incident of 5 August 2024. On that day, the Wife had returned to the Flat (again) to retrieve her personal belongings and those of the 1<sup>st</sup> Son. This time, she was accompanied by a Sunday church schoolteacher (“**teacher**”).

(a) According to the Wife, the Husband (i) had rushed her to pack her items, (ii) had placed her in fear by locking the Flat’s door, and (iii) had forced her to sign a letter which was not in her native language. While the teacher was translating the letter’s contents to her, the Husband took the opportunity to go through her items. Later, when the Wife had time to check her bag, she realised that some items were missing. They included jewellery, cash, commemorative notes and her children’s piggybanks amounting to \$15,000.<sup>38</sup>

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<sup>37</sup> The Husband had referred to the Flat as the “matrimonial home” in both his AEIC (see e.g., the Husband’s Affidavit dated 22 August 2024 at [4]) and submissions (see e.g., the Respondent’s Written Closing Submissions dated 4 March 2025 at [1]).

<sup>38</sup> Complainant’s Affidavit dated 19 September 2024 at [91] to [94].

- (b) The Husband did not give any evidence regarding the 5 August incident.

*My decision*

43 In my view, the Wife had failed to prove that the Husband had committed “family violence” – as the term is defined in s 64 of the Charter – on 5 August 2024. Let me explain.

- (a) Regarding the Husband’s act in [42(a)(i)] – there is no evidence that he had threatened the Wife in any way, or that his act of rushing her had risen to the level of continual harassment.

- (b) As for the Husband’s act in [42(a)(ii)] – I find the act of locking the Flat’s door, on its own, does not amount to wrongful confinement or restraint. It is not uncommon for homeowners to lock their door for security reasons.

- (c) Turning to the Husband’s act in [42(a)(iii)] – the mere fact that he had “forced” the Wife to sign the letter is neither here nor there. She did not provide the details of how he had “forced” her to sign the letter, e.g., whether threats had been made.

- (d) Finally, *assuming* that the Husband had taken the missing items, this does not come within any of the four limbs of “family violence”.

***Summing up***

44 To sum up – I find that the Husband had committed family violence during the following incidents:

	<b>Date of incident</b>	<b>Victim of family violence</b>
(a)	23 March 2024 Tooth extraction incident	Wife
(b)	07 July 2024 Triggering incident	Wife and 1 <sup>st</sup> Son
(c)	11 July 2024 Metal gate incident	Wife

### Is a PPO necessary

45 I now come to the second requirement for the issue of PPO – i.e., whether a PPO is necessary for the protection of the 1<sup>st</sup> Son and the Wife.

### *Applicable principles*

46 The principles relating to this requirement are well-settled.

(a) The question of whether a PPO is necessary or not involves a risk assessment – i.e., *how likely will the respondent commit family violence against the applicant in future?* If there is little or no risk of such violence, then a PPO will be unnecessary: *XFL v XFM* [2024] SGFC 103 ( “*XFL*” ) at [19] and [20]. One the other hand, if there is a risk of family violence in future, then a PPO is appropriate as it can deter such violence: *XFL* at [21] and [23].

(b) Factors that are relevant to the risk assessment in (a) above include the following. (For further discussion, see *XFL* at [20].)

(i) What are the reasons/circumstances for the family violence.

(ii) Whether the family violence is a recent occurrence.

- (iii) Whether the family violence is a one-off occurrence.
  - (iv) Whether there has been a material change in the circumstances since the commission of family violence.
- (c) Factors that may suggest that there is a risk of family violence in future include the following. (For further discussion, see *XFL* at [21].)
- (i) The underlying cause for family violence remains unresolved.
  - (ii) The parties are likely to have future interactions.
  - (iii) The respondent is deeply antagonistic towards the applicant.
  - (iv) The respondent has a propensity for violence.
  - (v) The respondent is unapologetic for the family violence that had been committed.
  - (vi) There is an escalation in the family violence.
  - (vii) Further violence is committed after the PPO application.

***PPO is necessary***

47 In my view, a PPO is necessary in the present case.

*Protection for the Wife*

48 I find that there is a risk of the Husband committing family violence against the Wife in future. I have come to this finding for the following reasons.

- (a) Violence committed recently. The last incident of family violence against the Wife was committed just a few months prior to my verdict in this case.
- (b) Violence not isolated incident. Altogether, the Husband had committed family violence against the Wife on three occasions: see [44].
- (c) Unresolved issues. There is no evidence that the underlying cause for the family violence – i.e., how to manage and discipline the 1<sup>st</sup> Son – has been unresolved between the parties. According to the Wife, Husband is ill-equipped and/or does not have the temperament to handle the child who has Autism Spectrum Disorder and Generalised Anxiety Disorder.<sup>39</sup>
- (d) Future interactions. I am mindful that the parties are no longer living together. In my view, this does not render a PPO unnecessary. Two points bear highlighting. *One*, the family violence had arisen because of the Husband's unhappiness with the Wife for interfering in his actions relating to the 1<sup>st</sup> Son. Assuming that the parties have joint custody of the child, the potential for conflicts over parenting styles will remain. *Two*, given that the parties are living apart, they will need to interact regularly regarding the Husband's access to the 1<sup>st</sup> Son. There

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<sup>39</sup> Complainant's Closing Submissions dated 4 March 2025 at [35]. See also the Wife's contemporaneous messages in her Supplementary Affidavit dated 21 October 2024 at page 10 and 25.

is evidence that the child is reluctant to see the Husband: see [50(b)] below. In the circumstances, the issue of child access is likely to be a source of conflict between the parties in future.

(e) Acrimonious relationship. During the trial, it is clear to me that the parties' relationship is very strained. The Husband blames the Wife for denying him access to the 1<sup>st</sup> Son and has taken up an application for interim child access. This application is pending as at the time of verdict. During oral submissions, I was also informed that the Husband finds it upsetting that despite being the father, he can only see the child in the presence of a social worker.

(f) Lack of remorse. The Husband is not apologetic for the violence that he had committed against the Wife. Further, he feels entitled to assert his "rights" against her – including to prevent her from returning to the matrimonial home (for her to collect her belongings) and to evict her from it. It bears highlighting that the Wife is a foreigner with apparently no relatives in Singapore. Because of his decision to evict the Wife, she had to stay at various places, including a shelter.

(g) Further violence. Finally, even after the Wife had filed a PPO application on 10 July 2024, the Husband was undeterred. He continued to commit family violence on her the very next day, shortly after having received a court summons relating to her application: see [35] above.<sup>40</sup>

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<sup>40</sup> Husband's Affidavit dated 22 August 2024 at [13] and [14].

*Protection for the 1<sup>st</sup> Son*

49 Similarly, I find that there is a risk of the Husband committing family violence against the 1<sup>st</sup> Son in future.

(a) Violence committed recently. The family violence was committed recently (7 July 2024).

(b) Violence not isolated. It appears that the family violence on 7 July 2024 is not an isolated incident. There are several contemporaneous text messages from the Wife to her family in Japan alluding to the fact that the Husband had been violent with the child.

(i) In 2021 (when the 1<sup>st</sup> Son was just seven years old), the Wife had texted that the child was “whipped every day”.<sup>41</sup>

(ii) In May 2023, the Wife had sent another message about the Husband hitting the child “despite him not doing anything but just because he [did not] like the [1<sup>st</sup> Son’s] moves”.<sup>42</sup>

(iii) In July 2023, there is further message from the Wife about the Husband’s physical punishment becoming more severe because of the child’s abnormal behaviour. (In September 2022, the child was found to be autistic.) In the same message, she had also texted that the child “feels a lot more mentally stable when his dad is not around”.<sup>43</sup>

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<sup>41</sup> The Wife’s Supplementary Affidavit dated 21 October 2024 at page 13.

<sup>42</sup> The Wife’s Supplementary Affidavit dated 21 October 2024 at page 17.

<sup>43</sup> The Wife’s Supplementary Affidavit dated 21 October 2024 at pages 10 and 21.

I find that the Wife did not send the above messages for the purpose of building a case for a PPO application against the Husband. These are my reasons for coming to such a finding.

(iv) The messages were sent *at least one year before* the PPO application was filed (in July 2024).

(v) Furthermore, the *tone and context* of the messages show that they were desperate cries for help by a mother who felt frustrated and helpless by the family violence committed against her child.

(vi) In September 2021, the Wife had texted that she was “worried that [the whipping] might be reported”.<sup>44</sup> Such an expression of concern – about the implications of the Husband’s violence towards the 1<sup>st</sup> Son coming to light – is inconsistent with case building by the Wife.

Finally, I wish to add that apart from the messages, there is another piece of evidence which suggests that the Husband had hit the child on multiple occasions for some time: see [50(a)] below.

(c) Lack of remorse. Based on the Wife’s evidence (which I accept), the Husband did not see anything wrong with him forcefully hitting the 1<sup>st</sup> Son’s head – a vulnerable part of the body – during the 7 July incident.

(d) Unresolved issues. The Husband committed the violence because of his perception that the 1<sup>st</sup> Son had been “disrespectful”. It

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<sup>44</sup> The Wife’s Supplementary Affidavit dated 21 October 2024 at page 13.

bears noting that the child has Autism Spectrum Disorder and Generalised Anxiety Disorder. According to the Wife, the Husband is in denial over the fact that the child has autism.<sup>45</sup> There is evidence to suggest that because of the Husband's parenting style, the child has developed issues with his father: see [50(b)] below. During the trial, the Husband did not challenge any of this evidence. Neither did he show how – if at all – he has acknowledged or considered the 1<sup>st</sup> Son's condition in his approach to managing and disciplining the child.

(e) Future interactions. As a father, the Husband will continue to have the right to have access to the 1<sup>st</sup> Son. A PPO is necessary to remind him the importance of addressing the issues in (d) above when managing the child.

*Child Guidance Clinic report*

50 Before concluding, I wish to state that in deciding whether to impose a PPO, I have considered a medical report dated 11 September 2024 prepared by the Child Guidance Clinic (“CGC”). According to the report<sup>46</sup> –

(a) The child alleged that he had been hit “by his father since 3 years ago over multiple occasions when he was unable to complete his homework, made mistakes at home or did not respond to his father when spoken to”.

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<sup>45</sup> Complainant's Affidavit dated 19 September 2024 at [35] and [36].

<sup>46</sup> The CGC report can be found in the Wife's Supplementary Affidavit dated 21 October 2024 at page 30.

(b) The child “had verbalised about having suicidal thoughts by jumping off from his father’s apartment if he were made to return to his father”.

(Collectively “**Observations**”)

51 The Observations are *clearly relevant* to the issue of whether a PPO should be granted: see [49(c)] and [49(e)].

52 I am mindful that the Observations are hearsay (in that the 1<sup>st</sup> Son and the maker of the report did not testify at the trial) and are untested by cross-examination. Nonetheless, I see no reason to doubt the accuracy and objectivity of the Observations. Let me elaborate.

(a) *First*, according to the CGC report, the Observations are derived from interviews with the 1<sup>st</sup> Son *alone* during his assessment and therapy sessions.<sup>47</sup> This means that the Wife was not present during the interview sessions to influence what the child told CGC.

(b) *Second*, the Observations are consistent with several key aspects of the Wife’s contemporaneous messages (see [49(c)] above), AEIC, and testimony – e.g., regarding when the Husband had started becoming violent towards the child as well as the randomness of his violence.

(c) *Third*, the Observations are reported by CGC, an independent body. It is a department that comes under the Institute of Mental Health, the national agency charged with the supporting persons with mental health issues.

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<sup>47</sup> See paragraph 3 of the CGC report. The report can be found in the Wife’s Supplementary Affidavit dated 21 October 2024 at page 30.

(d) *Finally*, the Husband did not raise any objection to the admission of the CGC report.<sup>48</sup>

**Conclusion**

53 For the above reasons, I imposed a PPO on the Husband. In my view, the PPO is necessary to deter him from committing family violence against the Wife and the 1<sup>st</sup> Son in future.

54 Additionally, I ordered the parties to undergo mandatory counselling. I note that there are no pending divorce proceedings between the Husband and Wife. It is my hope that the counselling can help all parties concerned develop insights and repair their broken relationships.

Kow Keng Siong  
District Judge

Clement Yong Hong Kit & Nicole Thong Xiao Ying  
(Ms Beyond Legal LLC) for the Wife;

Clarence Lun Yaodong (Ms Fervent Chambers LLC) for the Husband.

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<sup>48</sup> Record of Proceedings for 5 November 2024 at page 4 (line 8 to line 20).