

IN THE FAMILY JUSTICE COURTS OF THE REPUBLIC OF SINGAPORE

[2026] SGFC 23

SSP 443 of 2025

Between

XXW

... Applicant

And

XXX

... Respondent

SSP 505 of 2025

Between

XXX

... Applicant

And

XXY

... Respondent

SSP 506 of 2025

Between

XXX

... Applicant

And

XXW
... Respondent
SSP 594 of 2025

Between
XXY
... Applicant
And
XXX
... Respondent
SSP 633 of 2025

Between
XXZ
... Applicant
And
XXW
... Respondent
SSP 634 of 2025

Between
XXZ

And

... *Applicant*

XXY

... *Respondent*

JUDGMENT

[Family Law — Personal Protection Order]

[Family Law — Personal Protection Order — Definition of Physical Abuse]

[Family Law — Personal Protection Order — Definition of Emotional and/or
Psychological Abuse]

This judgment is subject to final editorial corrections approved by the court and/or redaction pursuant to the publisher's duty in compliance with the law, for publication in LawNet and/or the Singapore Law Reports.

XXW

v

XXX

and 5 other matters

[2026] SGFC 23

Family Court — SSP 443/2025, SSP 505/2025, SSP 506/2025, SSP 594/2025,
SSP 633/2025 and SSP 634/2025

Magistrate Soh Kian Peng

5, 6, 7 August, 6 November 2025

11 December 2025

Magistrate Soh Kian Peng:

Introduction

1 This was a family deeply divided by their own internal conflict. The Father and Mother are embroiled in divorce proceedings which had begun in 2019, but have yet to conclude.

2 They have five children to their marriage: A, B, C, D, and E. Of their five children, only two are parties to the present proceedings.

3 In one camp, were the Father and the eldest son, A. They were represented by Ms Amelia Ang (“Ms Ang”) and Ms Victoria Lynn Chin.

4 In the other camp, were the Mother, and D. They were represented by Ms Tan Ei Leen (“Ms Tan”).

5 This conflict between both camps came to a head after an incident that had taken place at the family bungalow (the “Matrimonial Home”) on 1 March 2025 (the “Car Porch Incident”).

6 At around 7pm on that day, the Father’s friend (“HN”) had arrived at the house with his family in tow. The context to this was that the Father had invited HN and his family to stay over for a few weeks as HN was waiting to collect the keys to his new home.

7 HN’s arrival on that day sparked a confrontation. A and D faced off on the front porch. A scuffle erupted. While it was a brief scuffle, parties hotly dispute what had taken place, and allege that family violence had been inflicted on them in this brief altercation.

8 It appears that this incident was the straw that broke the proverbial camel’s back. In the wake of that incident, parties took out the following six applications:

- (a) SSP 443/2025 (“SSP 443”): this was the Mother’s application against the Father.
- (b) SSP 505/2025 (“SSP 505”): this was the Father’s application against D.
- (c) SSP 506/2025 (“SSP 506”): this was the Father’s application against the Mother.

(d) SSP 594/2025 (“SSP 594”): this was D’s application against the Father.

(e) SSP 633/2025 (“SSP 633”): this was A’s application against the Mother.

(f) SSP 634/2025 (“SSP 634”): this was A’s application against D.

9 I heard the trial of all six matters across three days in August. Judgment was reserved. Written submissions were filed. A further hearing was convened on 6 November for me to hear further arguments on various points raised in written submissions. This is my decision in respect of all six applications.

The Law

10 When it comes to applications for PPOs, the first port of call must be the provisions relating to family violence that are found under Part 7 of the Women’s Charter 1961 (the “Charter”). There are, however, several questions as to how these provisions should be interpreted and applied. I shall deal with these issues in turn.

What is the proper approach to determining if a PPO should be granted?

11 As to the requirements that must be satisfied in order to obtain a PPO, that is set out in s 60A(1) of the Charter. That provision states:

60A.—(1) 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 —

- (a) X has committed or is likely to commit family violence against Y; and
- (b) the protection order is necessary for the protection or personal safety of Y.

12 While s 60A(1) makes clear what are the requirements that must be proved, and the standard to which they must be proved, in order to obtain a PPO, it does not make clear how this inquiry is to be approached. At a first glance, there appear to be two possible approaches to the assessment of whether the court should grant a PPO:

(a) To approach the inquiry sequentially. That is to say, the court first examines whether an act of family violence had been committed, or was likely to be committed, before moving to consider whether it was necessary to order the PPO for Y’s protection or personal safety (the “First Interpretation”).

(b) In ascertaining whether a PPO should be ordered, the touchstone is necessity as set out in s 60A(1)(b) (the “Second Interpretation”). That means the focus of the inquiry centers on whether it is necessary to order a PPO for the protection or personal safety of the person sought to be protected. To that end, a key ingredient in finding that a PPO is necessary is whether there have been acts of family violence committed, or whether it is likely that the respondent will commit family violence (*ie*, the court must also be satisfied that the requirements in s 60A(1)(a) are established). This interpretation finds its basis in the function of a PPO, which our jurisprudence has described as being intended to protect and not to punish: see *WSD v WSE and another matter* [2024] SGFC 1.

13 Both Ms Ang and Ms Tan took differing positions.

14 Ms Ang argued that the Second Interpretation was preferable. This approach not only “better served the protective purpose of a PPO (as opposed to punishment)”, but also “reflected that s 60A(1) set out a composite and

overlapping set of considerations anchored by necessity, rather than strictly discrete, distinct and self-contained elements”.¹Applying this approach would mean that the court’s “overarching inquiry is whether ordering a PPO is necessary for the protection or personal safety of the person sought to be protected”, and this means that s 60A(1)(a) (*ie*, the family violence requirement) would no longer be a distinct cumulative requirement to be considered, but rather, one of several factors assisting the court in assessing the “necessity” requirement.²

15 This approach, as Ms Ang argued, was in line with parliamentary intent. It was evident from the Second Reading of the Women’s Charter (Family Violence and Other Matters) (Amendment) Bill) No. 18/2023 (the “Second Reading”)³ that the “legislative focus was on safeguarding victims and preventing harm, rather than penalising respondents for [their] past conduct”.⁴

16 Ms Ang also offered several practical reasons as to why the Second Interpretation should be preferred. First, this would avoid families that were already burdened by conflict, to invest substantial time and costs proving the first limb (that family violence had been, or was likely to be committed), only to fail to establish the second limb of necessity. Second, that proving family violence is necessarily “backward-looking” and thus “compels individuals to relive traumatic episodes and would further damage relationships that most need healing”.⁵

¹ Father and A’s Written Submissions at para 12.

² Father and A’s Written Submissions at para 13.

³ Father and A’s Written Submissions at para 14.

⁴ Father and A’s Written Submissions at para 14.

⁵ Father and A’s Written Submissions at para 15.

17 As Ms Ang concluded – the Second Interpretation, by focussing the inquiry on the necessity of a PPO, the court will be able to evaluate, “in a single holistic analysis, the relationship between established acts of family violence, the likelihood of future family violence by the individual, and all other pertinent factors”.⁶

18 Ms Tan, on the other hand, advanced arguments in support of the First Interpretation. The basis of her argument was that there was “no indication” at the Second Reading that Parliament had intended to do away with the 2-stage inquiry. It was clear, from the speeches made, that a PPO would only be issued “when the Court is satisfied that both family violence has been or is likely to be committed and that protection is necessary for protection or personal safety”.⁷

19 In undertaking a purpose interpretation of a statutory provision, the first task is to ascertain possible interpretation of the text as it has been enacted, having regard to the context of that text within the written law as a whole: *Attorney General v Ting Choon Meng and another appeal* [2017] 1 SLR 573 (“*Ting Choon Meng*”) at [59(a)]. The arguments advanced by Ms Ang and Ms Tan illustrate that there are, at least, two possible interpretations of s 60A(1).

20 The second step in the exercise of purposive interpretation is to ascertain the legislative purpose or the object of the statute. Here, the court is to “principally consider the general legislative purpose of the enactment by reference to any mischief that Parliament was seeking to address by it”: *Ting Choon Meng* at [59(b)]. It is clear from the Second Reading that the general

⁶ Father and A’s Written Submissions at para 18.

⁷ Mother and D’s Written Submissions at para 40.

legislative purpose of the amendments to the family violence provisions of the Charter was to provide a more comprehensive regime to tackle and break the cycle of family violence by addressing the needs of both survivors and perpetrators, and “supporting them towards family reconciliation where possible”.

21 In this vein, there were four main objectives that the amendments sought to achieve:

- (a) Amending the definitions of family violence to align with how abuse was defined in other acts. These amended definitions, in particular, the definition of emotional or psychological abuse, were broadened so as to deal with, amongst other things, egregious forms of controlling behaviour (commonly termed “coercive control” in other jurisdictions).
- (b) Empowering survivors of family violence to take steps to protect themselves. This included lowering the age requirement for a person to bring a PPO application on their own.
- (c) Strengthening the Government’s ability to intervene in family violence cases.
- (d) Empowering the Court to make “additional rehabilitative orders and strengthening enforcement against breaches including raising penalties”.

22 Given what had been said during the Second Reading, the First Interpretation would better reflect Parliamentary intent.

23 For one, there is much force to Ms Tan’s argument that Parliament did not intend to disturb settled law, specifically, that the approach to assessing whether a PPO should be ordered is a two-stage inquiry as has been articulated in cases such as *UNQ v UNR* [2020] SGHCF 21 at [23]. While Parliament had intended to expand the scope of protection, and augment the measures available to allow for targeted intervention at the root causes of family violence, it does not appear that Parliament had intended to do away, or modify the two-stage inquiry that applies in assessing whether a PPO should be granted.

24 Second, the finding of whether an act of family violence had been committed does have a bearing in the orders that the court may make in addition to granting a PPO. For example, before a Mandatory Treatment Order may be made, the appointed psychiatrist must, in the formal assessment report, certify that the psychiatric condition was “a contributing factor for X’s conduct or behaviour that was the basis for making the protection order against X”: s 60F(16)(b). Any finding that an act of family violence had been committed would be relevant to this exercise.

25 Framed in this way, the first requirement of whether an act of family violence had been, or was likely to be, committed serves as a threshold requirement. It sets the stage for the second stage of the analysis where the court must determine the necessity of making such orders.

26 That said, while I am unable to agree with Ms Ang’s argument that the Second Interpretation should apply, she does make several pertinent and incisive observations (see above at [16]).

27 For one, as Ms Ang points out, it is indeed the case that the requirement to prove that an act of family violence had occurred may be detrimental in two ways. Parties may be tempted to dredge up old grievances in the hopes that this would bolster their application. It would also mean that, for some, they would have to relive rather painful memories as they give evidence in support of their application. Finally, the requirement to prove that an act of family violence had been committed may distract parties who oftentimes forget that they too need to demonstrate to the court why it is necessary for such an order to be made.

28 While these are very real and practical concerns, they are not insurmountable, nor do they entirely render the two-stage inquiry unworkable.

29 It must be remembered that the basic function of a PPO is to protect. While it certainly does not punish the respondent for their past acts, it does remind them that should they continue to behave in this manner, there would be penal consequences (see *XFM v XFL* [2024] SGFC 103 at [23] where it was noted that a PPO does have a deterrent effect).

30 In other words, a PPO is a tool of last resort. It is typically deployed in situations where Y⁸ can no longer manage their relationship with X and intervention through the PPO is justified so as to ensure that Y does not suffer further harm or abuse at the hands of X. This, of course, reflects the reality that while most people are generally able to regulate their familial relationships by laying down and enforcing their boundaries, and standing up for themselves,

⁸ I adopt the same terminology as is used in the Charter, where “X” refers to the respondent to the PPO application, and “Y” refers to the person sought to be protected by the order.

there are some who may, given their circumstances, be unable to do so and thus find themselves trapped within a cycle of abuse.

31 The requirement of proving that an act of family violence had been committed is therefore important because it provides a glimpse into the dynamics of the relationship between X and Y. This insight has a direct bearing on the necessity requirement under s 60A(1)(b) (see *XNY v XNZ* [2025] SGFC 69 at [49] for the proposition that the requirement of necessity involves a risk assessment where the court considers the likelihood of the respondent committing family violence against the person sought to be protected).

32 Let me illustrate with the following example. X threatens to stab Y with a knife. This would fall within the definition of physical abuse under s 58B(2). Beyond that, proving this act of family violence would also speak to the necessity of ordering a PPO. For instance, it could demonstrate that X has a volatile temper. It could also show that X bears a grudge towards Y. All of these are relevant considerations in assessing the necessity of ordering a PPO.

33 It is also worth noting that it is not necessary to prove that an act of family violence had been committed – s 60A(1)(a) also makes it clear that it suffices to prove that X is likely to commit family violence. Here, the link between the first and second stages of the inquiry is clearer. Our jurisprudence shows that if it is proven that X is likely to commit family violence, it is presumed that a PPO would be necessary. The onus then shifts to the respondent to produce evidence showing that a PPO is not necessary to protect Y: *XEP v XEQ* [2024] SGFC 95 at [21]; *XMN v XMO* [2025] SGFC 54 at [17]; *XXR v XRY and another matter* [2025] SGFC 100 at [10].

34 Therefore, in approaching this two-stage inquiry in deciding whether a PPO should be granted, it is important to keep in mind that the two requirements set out under s 60A(1) are interrelated.

35 As a final point, and in relation to the requirement of necessity, parties did not dispute that this inquiry involved a risk assessment, and that the necessity requirement is established if it can be shown that the order is necessary for either Y's protection, or personal safety (with "or" as is used in s 60A(1)(b) being read disjunctively – XNY v XNZ [2025] SGFC 69).

Approach to determining whether family violence had been committed

36 Because parties' respective cases were premised on emotional and/or psychological abuse as well as physical abuse, it was relevant to consider how the court should set about determining whether such abuse had been committed. I turn now to deal with these points.

What is the test for determining whether an act or a series of acts amounts to emotional and/or psychological abuse?

37 The starting point must, once again, be the definition of emotional and/or psychological abuse as is set out in s 58B(4) of the Charter:

(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.

38 This definition must be read together with s 58(5) and (6). These provisions make clear that such abuse can either take the form of a single

instance of conduct or behaviour, or a course of conduct or behaviour. They also provide that such 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”.

39 The text of s 58B(4), however, does not make clear the approach that should be taken in assessing whether the conduct or behaviour in question “torments, intimidates, harasses or distresses a person”, or causes or may reasonably be expected to cause “mental harm”. The text makes clear that the inquiry is squarely on the impact, or the harm, suffered by Y. The assessment of such harm may, conceivably, be approached objectively or subjectively, and this may result in divergent outcomes. For example, if a purely objective approach were adopted, that could, in some cases, leave survivors who have *subjectively* experienced torment, intimidation, harassment or distress without recourse. Conversely, if a purely subjective approach were adopted, a conceivably wide range of conduct or behaviour could amount to emotional and/or psychological abuse under s 58B(4).

40 To illustrate this point, take, for example, the following situation. X tells Y that they are out of shape, and that they need to lose weight. If an objective approach were taken, such a comment, without more, would arguably not be considered conduct that torments, distresses, intimidates or harasses Y. However, adopting the objective approach could, arguably, ignore Y’s lived reality. From a subjective approach, Y could be said to be distressed by X’s comment.

41 Ms Ang took the position that a part-subjective, part-objective inquiry was appropriate in assessing whether there was emotional and/or psychological abuse under s 58B(4)(a).⁹ She made the following points.

42 First, that under the new provisions, there was no longer a need to prove the element of intent, or knowledge, on the part of X. Taking into consideration the protective function of a PPO, objectivity must be the “touchstone for assessing the conduct in question”, and the question is whether the “conduct would be regarded as emotional or psychological abuse by an ordinary, reasonable man.”¹⁰ This would “prevent any trivial conduct from constituting abuse merely because an unusually sensitive person claims to have been affected” – this would prevent the PPO regime from being “weaponised in the course of matrimonial proceedings”.¹¹

43 Second, while objectivity was the touchstone of the inquiry, the subjective characteristics of Y must also be taken into account so that “the PPO regime functions as a true and effective safeguard against family violence”.¹²

44 Similarly, Ms Tan also argued that a part-subjective, part-objective approach should be adopted in assessing whether there had been emotional and/or psychological abuse. Specifically, the court had to find that Y genuinely experienced distress (the subjective element), and that, when viewed

⁹ See Transcript, 6 November 2025 at pp 15 – 17.

¹⁰ Father and A’s Written Submissions at para 21.

¹¹ Father and A’s Written Submissions at para 21.

¹² Father and A’s Written Submissions at para 22.

“objectively and in context, the respondent’s behaviour was of such a nature that a reasonable observer would regard it as tormenting or harassing”.¹³

45 As Ms Tan pointed out, while the verbs “torments, harasses or distresses” used in s 58B(4)(a) described emotional states experienced by the victim, the inquiry cannot be a purely subjective one as it would “open the floodgates to unmeritorious claims founded only on a person’s asserted feelings of distress, however unreasonable or exaggerated”.¹⁴ In this connection, if the victim’s “subjective feelings or allegations alone were sufficient” for the court to find that emotional or psychological abuse had been inflicted, this would “trivialise the statutory purpose of the PPO regime” which was to “safeguard individuals from serious and demonstrable abuse” and not to “police every instance of familial disagreement or emotional discomfort”.

46 Ms Tan also highlighted this approach was consistent with how such abuse was dealt with under the Vulnerable Adults Act 2018 (“VAA”) and the Children and Young Persons Act 1993 (“CYPA”), and this was aptly illustrated though cases such as *Re GEQ and another matter* [2024] SLR(FC) 376 (“*Re GEQ*”), *BHR v Child Protector* [2013] SGJC 2 and *UNB v Child Protector* [2018] SGHCF 10,

47 In my judgment, an objective approach should be taken in assessing whether there had been emotional and/or psychological abuse. This would, as I set out below, approach the question from the perspective of a reasonable person in Y’s shoes. In this inquiry, while Y’s lived experience or subjective

¹³ Mother and D’s Written Submissions at para 55.

¹⁴ Mother and D’s Written Submissions at para 53.

characteristics may be taken into account, the ultimate question of whether Y had suffered emotional and/or psychological abuse must be weighed against an objective benchmark.

48 The chief reason for adopting an objective approach to assessing whether there had been emotional and/or psychological abuse is the penal consequences that arise in the event that X breaches the PPO. Here, s 60A(6) states:

(6) A person who knowingly contravenes a protection order commits a family violence offence punishable under section 63C.

49 In determining whether the PPO had been contravened, it is relevant to consider how such orders are worded. This is the language used in a PPO:

You, [X], shall be restrained from committing family violence against [Y].

50 It is thus clear that the PPO would have been breached if X commits *further* acts of family violence against Y (see *eg: Public Prosecutor v JDO* [2025] SGMC 20 at [10]). Effectively, the grant of a PPO renders the commission of further acts of family violence an offence that is punishable by a jail term and/or fine.

51 It must, therefore, logically follow that the same approach to assessing whether family violence had been committed must be applied, regardless of whether the inquiry is undertaken in the context of s 60A(1)(a), or in determining whether there had been a breach of a PPO.¹⁵

¹⁵ See Transcript, 6 November 2025, p 20.

52 The application of an objective standard would make it clear what is acceptable conduct, and what would constitute conduct that goes beyond the pale. This is especially important given the penal consequences that flow from a breach of the PPO: see s 63C of the Charter which sets out the punishment for family violence offences. It would also, as both Ms Ang and Ms Tan have put it, prevent any trivial conduct from amounting to emotional and/or psychological abuse and opening the floodgates to unmeritorious claims (see above at [42] and [45]).

53 How then, should the objective standard be applied in the context of emotional and/or psychological abuse? Here, the text of s 58B(4) sets out two types of harm that would constitute emotional and/or psychological abuse.

54 The first is conduct or behaviour that torments, intimidates, harasses or distresses a person (s 58B(4)(a)). Here, the relevant question to ask is whether a reasonable person, in the position of Y, would be tormented, intimidated, harassed or distressed by X’s conduct or behaviour.

55 The second is 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” (s 58B(4)(b)). Once again, the relevant question to ask is whether a reasonable person, in the position of Y, would have suffered mental harm as a consequence of X’s conduct or behaviour.

56 As to what the scope of “mental harm” includes – it is evident from the phrase “including thoughts of suicide or inflicting self-harm” that “mental harm” was not intended to be limited to recognised psychiatric conditions. That very same phrase – “including thoughts of suicide or inflicting self-harm” – also

tells us that not every blow or affront to one's mental state would constitute mental harm. The threshold appears to be much higher.

57 In applying the objective standard that I have sketched out above, it goes without saying that one must also have regard to the circumstances of the case (including Y's particular characteristics), as well as the relevant context in which the alleged conduct or behaviour had taken place.

What is the test for determining whether an act or a series of acts amounts to physical abuse

58 I turn now to consider the relevant test for ascertaining whether an act, or a series of acts, would amount to physical abuse under the Charter.

59 The definition of physical abuse is set out in s 58B(2) of the Charter:

(2) "Physical abuse" —

(a) includes 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 any force lawfully used —

(i) in self-defence; or

(ii) by way of correction towards a child below 18 years of age.

60 The text of s 58B(2) makes it clear that physical abuse includes:

(a) Conduct or behaviour that causes personal injury or physical pain to a person;

- (b) Conduct or behaviour that threatens to cause personal injury or physical pain to a person;
- (c) Conduct or behaviour that threatens a person with the death or injury of the person; and
- (d) Wrongfully confining or restraining a person against their will.

61 What the text of s 58B(2), however, does not make clear, is the approach that the court should take in its assessment – specifically, whether the inquiry is: a) objective, b) subjective, or c) part-objective and part-subjective.

62 The reason why this is relevant is because the concept of “physical pain”, “personal injury”, or threats made against a person can take on a different texture depending on whether one adopts a subjective or an objective approach. For instance, a paper cut, or a mild bruise could, on a subjective approach, be said to constitute “physical pain” or “personal injury”. However, the application of an objective approach, could conceivably, yield the opposite result.

63 Ms Ang argued that a part-objective, part-subjective approach should be adopted. Given that the definitions of family violence were updated to reflect how abuse was defined in the VAA and CYPA, it was relevant to consider how the court had approached the issue of physical abuse in those cases. To illustrate the point, Ms Ang cited the cases of *Re GEQ* and *Public Prosecutor v Alamelu D/O Paramaguru* [2025] SGDC 217 (“*PP v Alamelu*”).¹⁶

¹⁶ Father and A’s Written Submissions at paras 37 – 39.

64 Similarly, Ms Tan argued that in determining whether the conduct or behaviour causes “physical pain”, the inquiry is both objective and subjective in nature. This requires the court to assess, objectively, whether the conduct was of a nature that would reasonably be expected to cause physical pain or injury, and also subjectively, whether the evidence does show that Y did, in fact, experience or had likely experienced physical pain.

65 The reason for such an approach was twofold. If a purely subjective approach were adopted, any bare assertion of “pain” would be sufficient to establish physical abuse. Conversely, a purely objective test would “ignore the victim’s actual experience of harm”. Ms Tan highlighted that while the amendments were “designed to enhance accessibility and provide earlier protection”, they were “not meant to render PPOs a free pass available on mere assertion”.¹⁷

66 As to how “physical pain” would be proved, Ms Tan made the point that such proof could come from medical evidence (*ie*, medical notes or reports) or contextual evidence (*ie*, eyewitness accounts, photographs, police reports, admissions, or contemporaneous messages), and that such evidence had to be considered in totality, bearing in mind that such acts “frequently occur in private and may not be accompanied by medical documentation”.¹⁸

67 In my judgment, and for the same reasons that I have set out above (at [48] – [52]), an objective approach must also be taken, having regard to the circumstances and relevant context, in assessing whether personal injury or

¹⁷ Mother and D’s Written Submissions at para 45.

¹⁸ Mother and D’s Written Submissions at para 48.

physical pain had indeed been caused, or whether the conduct in question had indeed threatened Y with death or injury, or personal injury or physical pain.

68 In this connection, *Re GEQ*, provides a useful illustration of how the objective approach might be applied. I do not derive any guidance from the case of *PP v Alamelu*. The accused in that case had pleaded guilty to a charge under s 6(1) of the Children and Young Persons Act 1993 (“CYPA”). The court thus had to deal with the issue of sentencing, and did not have to consider the approach to determining whether there was physical abuse.

69 Returning back to *Re GEQ*, that case concerned an application by the Director-General of Social Welfare for a set of orders to protect the vulnerable adult from the respondent. One issue which arose for the court’s determination was whether the respondent had physically abused the vulnerable adult by “requiring her to perform a series of over-exercises” that resulted in her suffering “unnecessary physical pain and affected her well-being”.

70 The court found (at [29]), that the respondent had indeed physically abused the vulnerable adult by imposing his exercise regime on her, and caused her at least physical pain without “proper regard of her reported spinal and pain issues”. It appears that the court had applied an objective approach in arriving at this conclusion, having regard to factors such as the vulnerable adult’s poor physical condition, the exercise regimen forced on her, as well as evidence from the medical professionals that had treated her.

The relevance of X's intention in determining whether family violence had been committed

71 I turn now to consider whether X's intention should be taken into account in determining whether family violence had been committed.

72 Ms Tan and Ms Ang both argued that there was no longer any requirement, on the part of the applicant, to prove that the respondent had acted with knowledge or intent. They both cited the Second Reading which made clear that the amendments to the family violence provisions were to enable survivors to “obtain protection against harmful conduct without having to prove what the perpetrator knew or ought to have known”.¹⁹

73 I agree. The previous definitions of family violence stated:

“family violence” means the commission of any of the following acts:

- (a) **wilfully or knowingly placing**, or attempting to place, a family member in fear of hurt;
- (b) causing hurt to a family member **by such act which is known or ought** to have been known would result in hurt;
- (c) wrongfully confining or restraining a family member against his or her will;
- (d) causing continual harassment **with intent to cause or knowing that it is likely to cause** anguish to a family member,

[emphasis added]

74 The amendments to the definition of family violence have made it clear that the applicant no longer needs to prove any intention or knowledge on the

¹⁹ Mother and D's Written Submissions at para 65; Father and A's Written Submissions at para 49.

part of the respondent. Language denoting the requirement to prove knowledge, or intention, which was present in the previous definitions of family violence, no longer find expression in the current, updated definitions of family violence.

75 While the applicant no longer has to prove any intention or knowledge on the part of the respondent in relation to alleged acts of family violence, I agree with Ms Tan that such knowledge or intention may still be relevant to “evaluat[ing] the nature, purpose and context of the conduct in determining whether it amounts to family violence within the meaning of the statute”.²⁰ As Ms Tan put it, a parent who restrains a violent child with the intention of preventing them from harming themselves, or a person who shoves another family member with the intent of putting them out of harm’s way, cannot seriously be said to have committed family violence.²¹ Such intention or knowledge would thus be relevant in putting the alleged acts of harm in its proper perspective, and provide the relevant context in assessing, objectively, whether family violence had indeed been committed.

76 Apart from this, there is one other way in which intention or knowledge on the part of X could be relevant – and that is in assessing the necessity of ordering a PPO. Take a situation where Y has arachnophobia. X sends Y a picture of a large spider. Objectively, one may conclude that Y was tormented or distressed by this. However, if the evidence shows that X had only intended to send that picture as a practical joke, and thereafter regretted their actions having seen the impact it had on Y, it would not be necessary to order a PPO in Y’s favour.

²⁰ Mother and D’s Written Submissions at para 66.

²¹ Mother and D’s Written Submissions at para 67.

The Six Applications

77 Having set out the law on family violence, I turn now to deal with the six applications before me.

SSP 443 and 506

78 These are cross-applications between the Mother and the Father. While the both of them rely on the Car Porch incident as a basis for their respective applications, the Mother had also cited one other incident in support of her application.

79 The Mother recounts an incident that had taken place sometime in 2013 (the “Knife Incident”). The Father had returned home drunk, having lost a lot of money gambling. The Mother had confronted the Father over his gambling habit. The Father flew into a rage, barged into the Mother’s room, scolded her, and hurled items that were on the bedside table onto the floor.

80 Amidst this, the Father’s friend called him on the phone. The Mother says that she heard the Father tell his friend on the phone that he wanted to hit her. Such was the Father’s rage that he threw the phone against the wall of the corridor and said that he was going downstairs to take a knife.

81 The Mother hurriedly told the two helpers, as well as A and B, to return to their bedrooms and lock the doors. The Mother took shelter in A’s bedroom. During this time, she heard sounds that “resembled a knife being dragged alongside the banister in the Matrimonial Home as there was a high-pitched screeching sound that was made”. The Mother also says that she heard sounds of a knife being knocked against the banister, followed by knocks against A’s door.

82 The police were called, and took statements from the Father, the Mother and A. The Mother alleges that this incident left an indelible mark on her. She lived in paranoia and fear of what the Father might do in his drunken rage.²²

83 Apart from this incident, the Mother also alleged that the Father’s gambling and alcohol addiction had been a “huge issue” in their marriage. She says that whenever the Father was drunk, he would behave violently – and this included: “swearing loudly in Hokkien, throwing dishes, smashing furniture and threatening to set fire to the house or commit suicide”.²³ The Mother also recounted that when she would visit the Matrimonial Home after she had been forced to move out, the Father would glare at her fiercely, make sarcastic remarks about her, or “display aggressions” towards her such as pointing “middle fingers” at her or saying that she would soon go to jail. She says she ignored these provocations for the sake of her children.²⁴

My decision

84 I begin with the Father’s claim in SSP 506. The basis of his claim was that the Mother had committed emotional and/or psychological abuse on him, and also incited physical abuse. He also alleged that the Mother was likely to commit such abuse against him in the future.

85 According to the Father, the Mother had orchestrated the entire Car Porch Incident. He says that she had waited in the Matrimonial Home, and even brought along her younger brother who had not visited for many years. He says

²² Mother’s Affidavit at paras 23 – 29.

²³ Mother’s Affidavit at para 20.

²⁴ Mother’s Affidavit at para 14.

that she wanted to make her displeasure and objection to letting his friend HN stay over at the Matrimonial Home, known.

86 Even if I were to take the Father's case at its highest, and assume that the Mother had indeed orchestrated the entire Car Porch incident in the manner that he had described, I do not find that this would constitute emotional and/or psychological abuse.

87 For one, the Father had not even, in his own affidavit, stated how the Mother's actions had impacted him. Further, and taking the perspective of a reasonable person in the Father's shoes, I do not find that the Father would have experienced "torment, intimidation, harassment or distress" at the Mother's actions. The most that could be said was that he had walked away from that incident with a bruised ego, given that his well laid plan to help his friend had fallen through. He may have, understandably, been upset, or even aggrieved – but this alone cannot, and does not, constitute emotional and/or psychological abuse.

88 As for the argument that the Father had suffered emotional and/or psychological abuse as a result of the Mother secretly recording and filming him, not only in the Car Porch incident, but also on other occasions,²⁵ this cannot be seriously entertained for the following reasons.

89 For one, this was not set out in the Father's complaint form. The *only* incident he had cited in his application in SSP 506, was the Car Porch incident. Further, the Father had made no mention of this in his affidavit. In fact, mention

²⁵ Father and A's Written Submissions at para 73.

of these recordings made by the Mother only appears in A's affidavit.²⁶ And while it was strenuously argued that the Father was negatively affected as he had to live under the constant threat of being recorded which created "an unsettling and intimidating environment",²⁷ there was no evidence on the record indicating the *frequency* at which the Mother made such recordings. There was also no evidence on the record showing the impact such recordings had on the Father's state of mind.

90 Finally, I would add that given the circumstances in which the Father had raised this complaint against the Mother, this appears to me to be nothing more than an attempt, by the Father, to bolster his case against the Mother on the grounds of emotional and/or psychological abuse.

91 As for the Father's claim against the Mother on the grounds of physical abuse, I too find that there is no merit to his allegations. While I agree with Ms Ang that a situation where X has incited others to violence against Y could fall within the definition of physical abuse, I do not find that the Mother had incited D's violence towards the Father.

92 A video recording of the incident was produced. It was played in court. Having reviewed the video along with the accompanying transcripts, it is clear to me that the Mother did not instigate the confrontation, or the ensuing scuffle. She had, in fact, shouted at her children to stop fighting.

93 Finally, I would observe that while it was argued, in written submissions, that the Mother had instigated the confrontation and the ensuing

²⁶ A's Affidavit at para 28.

²⁷ Father and A's Written Submissions at para 73.

violence towards the Father, this appeared to be but a mere assertion given that the arguments did not go on to explain, having regard to the relevant evidence, **how** the Mother had allegedly done so.²⁸

94 As to whether the Mother was likely to commit family violence on the Father, I do not find that to be the case. While much was made of the Mother's insistence on returning to the Matrimonial Home when she had no good reason to do so, which allegedly demonstrated a lack of insight into her actions,²⁹ the point is that, at least until the ancillary matters are settled, she is a co-owner, and absent any legal prohibition, would be entitled to return to the property if she so wishes.

95 In any event, even if the Mother did display a lack of insight – specifically, that her returning to the Matrimonial Home would only provide the kindling for further conflicts, the reality is that the property is large enough to allow the Mother and Father to sensibly avoid each other. As the Father had stated in his own affidavit:³⁰

...After all, the house is a bungalow with a large built-up living space of around 15,000 square feet, with ample space for me to avoid meeting or interacting with [the Mother] when she comes over.

In this connection, there is also the evidence of their Burmese helper, who had been employed since November 2022, that she had not seen the Father

²⁸ Father and A's Written Submissions at paras 69 – 71.

²⁹ Father and A's Written Submissions at paras 77 – 79.

³⁰ Father's Affidavit at para 12.

interacting with the Mother,³¹ and that since the Car Porch incident, she had not witnessed any other incidents at the Matrimonial Home.³²

96 Finally, while it was also highlighted that the Mother “unreasonably expected others to understand her thoughts and intentions without any direct communication”,³³ I do not think that this points to the likelihood of the Mother committing family violence on the Father.

97 Given that I have not found that the Mother had committed, or was likely to commit family violence on the Father, his application must fail.

98 In any event, I would state that I do not find it necessary to grant the PPO for the Father’s personal safety or protection. In my judgment, there is a low risk of the Mother committing family violence on the Father. While both the Father and the Mother do not share a good relationship, I do not find that the Mother bears any ill will towards the Father. Finally, having found that there was no merit to the Father’s claims of the Mother having committed family violence on him (above at [84] – [96]), there was no basis on which to conclude that there was a risk of the Mother committing *further* family violence on the Father.

99 I turn now to deal with the Mother’s application.

100 It was argued, in written submissions, that the Mother had, in her affidavit and oral testimony, given evidence of “various incidents” which had

³¹ Transcript, 7 August 2025, p 77, lns 7 – 9.

³² Transcript, 7 August 2025, p 78, lns 5 – 9.

³³ Father and A’s Written Submissions at paras 79 – 80.

taken place during the marriage where the Father had inflicted emotional and/or psychological abuse.³⁴

101 Apart from the Knife Incident, the only other allegations which the Mother had raised against the Father was his behaviour towards her when she encountered in him the Matrimonial Home (see above at [83]), as well as the Father's propensity for violence when he was drunk and how he would smash plates on the ground in a fit of anger after having lost money gambling.³⁵

102 Even accepting that the Mother's accounts of her unpleasant encounters with the Father in the Matrimonial Home are true, they appear to have occurred during the time when their marriage was breaking down. This would have been, naturally, a tense and emotionally charged period for both the Mother and the Father. Given this, while it may be fairly said that the Father had behaved rudely, I do not find that his conduct constituted emotional and/or psychological abuse.

103 As to the other allegations made against the Father, namely, his propensity to fly into a drunken rage, especially having lost money gambling, I do not find that the Mother had proven this.

104 Ms Tan had argued that the absence of corroboration should not preclude a finding of domestic abuse, especially given that such acts frequently happen behind closed doors, and victims "often refrain from or delay the making of

³⁴ Mother and D's Written Submissions at para 87.

³⁵ Mother's Affidavit at para 20.

police reports or keeping written records, especially within ongoing marriages”.³⁶

105 Such a general observation, however, cannot be used to compensate for the evidential shortcomings in one’s application. In the present case, divorce proceedings had already been taken out. Interim judgment had been granted, and matters were slowly winding their way towards a hearing of the ancillary matters. Surely, some mention of the Father’s alcoholism or gambling habits must have been made in either the particulars setting out the grounds for divorce, or in the affidavits filed in preparation for the ancillary matters hearing. That, in fact, does appear to be the case – the Mother had, in her complaint form, stated that she had set out such details in her Affidavit of Assets and Means. However, no evidence of the same had been placed before me, nor was there any application made to refer to the affidavits that had been filed in the divorce proceedings. There was therefore no evidence to prove the Father’s propensity to fly into a drunken rage, or that he had lost money gambling – let alone, how he would behave when that happened. While Ms Tan had asked the Father some questions on his gambling habits in cross-examination, this point was not strenuously pursued.³⁷

106 As for the Knife Incident, the Mother was not questioned on this point in cross-examination, nor was this point dealt with in the Father’s written submissions. Also, while the Mother had stated that she had taken shelter in A’s room during this incident, no questions were put to A during his cross-

³⁶ Mother and D’s Written Submissions at para 88.

³⁷ Transcript, 6 Aug, pp 79 – 80.

examination. It also bears noting that the Father's response was a bare denial of the Mother's allegations regarding the Knife Incident.³⁸

107 Given this, I accept the Mother's account of what had happened in the Knife Incident. Based on the Mother's narration of what had happened, I am satisfied that the Knife Incident would constitute emotional and/or psychological abuse. Any reasonable person in the Mother's shoes would feel distressed at the Father's actions that night, namely, the threats of hitting her coupled with his statement that he was going to take a knife, and his actions thereafter which included creating sounds that resembled a knife being dragged across the banister.

108 However, I do not find that the Father had committed family violence on the Mother in the Car Porch incident. That much, to me, is clear from the video as well as the transcripts that were produced. Although there was one part of the video which showed the Father moving towards the Mother, it is unclear whether the Father had done so in an attempt to hit the Mother, or whether he was simply trying to step back into the house. There is, in any event, no way to discern this because D had intervened and pushed the Father to the ground.

109 That said, I do not find that the Mother has established the necessity of ordering a PPO. As I had noted, while the Mother may still share a common space with the Father when she returns to the Matrimonial Home, the reality is that it is a large property and so the two of them would be able to avoid each other.

³⁸ Transcript, 7 Aug, p 33, lns 23 – 30; Father's affidavit at para 39.

110 Further, apart from the Knife Incident and the Car Porch Incident, the Mother had not recounted any other *specific* incidents of family violence which she says the Father had inflicted on her. The rest of her allegations were framed generally, and lacking in detail. It appears to me that such incidents between the Father and the Mother may well be infrequent, and this is certainly a factor weighing against the need to grant a PPO.

111 Given this, it must therefore follow that the Mother's application for a PPO also fails.

SSP 505 and 594

112 I go on to deal with SSP 505 and 593, which were cross-applications between the Father and D.

113 Both the Father and D rely on the Car Porch incident in support of their respective applications against each other. The video of the incident shows D going up to confront the Father in a rather aggressive way. A steps in to intervene. The tension builds and A and D start tussling with each other.

114 Amidst the tussle, D breaks free. He can be seen putting the Father in a chokehold. Those present manage to separate and restrain both D and the Father. The Father then moves in the Mother's direction – though, as I note above (at [108]), it is unclear whether he is moving towards the entrance of the house, or moving to attack the Mother. That is because D suddenly intervenes and pushes the Father to the ground.

115 It is clear from the video that D had acted aggressively towards the Father in this situation. I consider that his act of putting the Father, who was an

elderly man, in a chokehold, and pushing him to the ground would fall within the definition of physical abuse – specifically, that he had caused the Father physical pain.

116 Given my finding, it was clear to me that the Father had not inflicted any family violence on D in this incident. That being said, D has two more strings to his legal bow given that he had cited two other incidents in his complaint form.

117 The first had taken place in 2019. D says that in this case, the Father had been verbally abusive towards B. D had gone to confront the Father the next day. He wanted to know why the Father had said those words to B, and to tell him not to say such hurtful things in the future. The Father was seated on a high stool chair in the living room. The Father erupted when D confronted him. He had picked up a glass cigarette dish on a nearby table and swung it towards D's face.

118 D blocked the blow and grabbed the cigarette tray, thinking that it would stop the Father's attack. It did not. The Father proceeded to grab D's neck. A commotion ensued. D's siblings came out to see what the commotion was. The police were called in, and the situation was defused. D says he declined to press charges against the Father.³⁹

119 The second incident had taken place in 2021.⁴⁰ D was having supper at the kitchen table. He saw that the Father was drunk. He says he tried to finish

³⁹ D's Affidavit at paras 18 – 23.

⁴⁰ D's Affidavit at paras 25 – 30.

his food so as to avoid the Father, knowing of his tendency to be violent and aggressive when drunk.

120 The Father, however, had spotted D and tried to speak to D about the Mother. The Father was apparently unhappy with the Mother who had disapproved of the Father's group of friends. In this conversation, D referred to the Father's friends, in Mandarin, as being "good for nothing" as the Father would invariably end up drinking or gambling whenever he was with them.

121 The Father was enraged. He picked up a porcelain plate and swung it towards D's face. D blocked the blow, and a struggle ensued. While D did not suffer any physical injuries from this incident, he says that it shows how unpredictable the Father was with his "temper and violence".⁴¹

122 In written submissions, Ms Ang pointed to the fact that D had, in his testimony, said that there were police reports of both these incidents, but he "did not think it necessary to substantiate this report".⁴²

123 I think the fact that D did not disclose these reports is telling. His testimony suggests that he knew that there was the option of disclosing these police reports, but for some unexplained reason, had decided that it was not necessary to do so. In addition to this, there is also evidence to suggest that D had angry outbursts towards his Father on other occasions – the Father had said that when D was angry with him, D would call him a "fucking old man".⁴³ D

⁴¹ D's Affidavit at para 30.

⁴² Transcript, 6 Aug, p 50, lns 14 – 23.

⁴³ Transcript, 6 Aug 2025, p 76 at ln 6.

had apparently told the Father that he could kill him by hitting him with his hands and/or legs.⁴⁴

124 The conclusion I draw is that these police reports, if disclosed, would provide a different story from the tale D had told in his affidavit: Illustration (g) to s 116 of the Evidence Act 1893; *Gurbani & Co LLC v Paulus Tannos* [2025] SGHC 177 at [27]. I therefore do not accept D's account of events as to what had happened in the two incidents that had taken place in 2019 and 2021 respectively.

125 Aside from these incidents, D relied on one other point to support his claim of emotional and/or psychological abuse that was not in his complaint form. He had, in his testimony, told me that the Father would tell C that he had gone out gambling when he had actually gone for supper. D also said that the Father had been badmouthing him to C.

126 While what D had narrated appears to, at first blush, resemble the situation set out in Illustration (a) to s 58B of the Charter, D's account lacks sufficient contextual detail to assess what exactly the Father had said to C. Further, D did not go on to state exactly how he felt about the Father saying these things about him.

127 In any event, and even if I accepted D's account – I do not find that the Father's actions had caused him torment, distress, or that it had intimidated or harassed him. D, in his own words, expressed a desire to reconcile with the Father and to salvage their relationship. He also told me that as he continued to live in the Matrimonial Home, he would, whenever the Father required help,

⁴⁴ Transcript, 6 Aug 2025, p 76 at ln 6 – 7.

assist him with running errands or help to log into his Youtube account. This was not the behaviour of a son who was tormented or distressed by the words of his father.

128 I therefore find that while D had committed an act of family violence on the Father, the Father had not committed an act of family violence on D.

129 This leaves me to deal with whether it is necessary to grant the PPO, and in this regard, I do not find that either the Father, or D, has demonstrated why a PPO is necessary for their protection or personal safety. While much was made of the fact that D continues to reside in the Matrimonial Home, and would not be moving out, at least until 2027,⁴⁵ I was not pointed to any evidence, apart from the incidents which I have dealt with above, demonstrating repeated skirmishes between the Father and D.

130 Although the relationship between the Father and D was strained, I did not find, on the evidence, that they bore deep-seated grudges towards each other. I do note that the Father had apparently placed a “condition” on the possibility of reconciliation, namely, that he would only “let this go” if D acknowledged that he was in the wrong. The broader and more important point, however was that *both* the Father and D expressed hope at the possibility of reconciliation, and a chance at rebuilding the father-son relationship.

131 Given that neither the Father or D had proven the necessity of ordering the PPO for their protection or personal safety, their applications in SSP 505 and 594 must fail.

⁴⁵ Mother and D’s Written Submissions at para 136.

SSP 633 and 634

132 These were A’s applications against the Mother and D. A relies on the Car Porch Incident as his basis for both applications. That much was clear from the complaint form he had filed.

133 I deal, first, with A’s application against the Mother. I do not find that the Mother had committed any act of family violence on A in the Car Porch Incident.

134 Although A recounts that incident in his affidavit, he does not set out any details of what he says the Mother had done to him, save to say that he thought that the scratch marks he had suffered could be either due to the Mother or B digging their fingernails into him. A also makes the vague allegation that he had “strong reason” to believe that the Mother was one of the people who had grabbed him, causing him to suffer injuries around his neck region.⁴⁶

135 A’s account of what he says the Mother had done to him in the Car Porch Incident are vague and speculative at best. I would also add that it is clear from the video clip and the transcript, that the Mother did not commit any act of family violence on A in that incident. In fact, in the video, the Mother can be heard yelling at both her sons to stop the fight. If the Mother had indeed grabbed A during the scuffle, then this was likely done in an attempt to stop her two sons from fighting each other.

136 While A claimed to be afraid of the Mother, his answers to my questions revealed what appears to be the root cause of his disgruntlement – that he had,

⁴⁶ A’s Affidavit at para 16.

as the eldest child, been caught in between his warring parents, and his disapproval of what the Mother had apparently done to the Father:⁴⁷

Court: Could you elaborate, especially why you feel fear towards her?

A: Because for all I believe, she is not---she is not a physically violent person, but I believe, in this family, she has created many troubles and issues, especially since the divorce started.

Court: Okay. And is this related to---well, I've heard you give evidence of how you were caught in the middle. Is that re---is it related to that?

A: I think being caught in the middle, you know---I mean, I wasn't happy being caught in the middle last time, but I just took it as, like---I didn't feel---maybe I feel a bit of anger and unhappiness being caught in the middle because, you know, actually, these are issues that, you know, two adults should settle themselves without involving their children. But since they couldn't solve it themselves, I mean, I can only try to mediate on their---on their behalf, which I did so until maybe 2020, early 2020, because---I mean, the other party might try to paint me as being strongly on the side of my father, but when I started helping him out, it was not to stand on his side or against the other side. It was to help him settle administrative issues because, you know, he's old in age, he doesn't know technology, he's forgetful. So many times, you know, he doesn't remember even his appointments. So it was just---and he's not good at English, so all the Court documents or affidavits or everything is all in English, so I had to help him out to keep up---to keep him up to date on the situation.

Court: Okay. I'm still not quite clear as to why you are afraid of your mother.

A: I think she tries to portray herself as a loving, peaceful, you know, mother or wife, but when you know her deeply, I think you realise all these

⁴⁷ Transcript, 7 Aug, at pp 47 – 48.

are just acts. I don't---you know, I don't believe she loves her family. I believe it's all just for her own personal benefits. I mean, there are---there is a case against her as well from my---by my father regarding her financial misdeeds, but this is still in progress. But I have seen evidence of certain issues. I think I should not give the specifics, but I can, you know---example, her salaries, dividends, director fees over the decades has always been to her personal account, but whereas---because my---whereas my father's own income has been moved into a joint name account, which he doesn't even know that it exists. So I remember, when I was helping him with his administrative things, like finding out hi---resetting his bank accounts, everything, I realised that he was basically left penniless. You know, his personal account had less than \$3,000. So it was quite amusing, to be honest, because I always thought he was quite wealthy, but, I mean, \$3,000 in his personal bank account. And, you know, he engaged Lee & Lee, so we didn't even know how would we pay these lawyers, you know, their salaries.

137 Further, while A claimed that he had “suffered psychological trauma and stress” from the Mother’s antics, this was merely a vague assertion in his affidavit,⁴⁸ and there was no proof of the alleged psychological trauma or stress that he had suffered.

138 It is thus clear that the Mother had not committed family violence on A. I also find that it is not necessary to order a PPO for A’s personal safety or protection against the Mother. For one, A had not pointed to any risk factors justifying the grant of a PPO against his own Mother. Further, as I had pointed out above (at [136]), it is apparent that A is unhappy with his Mother, and

⁴⁸ A’s Affidavit at para 27.

disapproves of how she has handled matters with the Father. But this is not a good reason to order a PPO in A's favour.

139 For these reasons, I dismiss A's application in SSP 633.

140 I turn now to deal with A's application against D. While A cites the Car Porch Incident as the basis for his application against D, and gives an account of it in his affidavit, he did not set out what harm, if any, D had inflicted on him in this incident. The video clip shows both A and D tussling and grabbing each other's shirts. The other members of their family had stepped in to restrain and separate the two brothers.

141 Having reviewed the video clip, and the audio recording, it is clear that D did not, in any way, inflict family violence on A. It was unseemingly behaviour for both brothers to be fighting in this manner, but D's actions towards A could not, by any stretch, fall within the definitions of family violence as set out in the Charter.

142 For this reason alone, A's application against D in SSP 634 must be dismissed. In any event, I also find that it is not necessary to order a PPO for A's protection or personal safety. While both A and D had their differences, especially in relation to their parents' marital issues, D appeared content to cut off ties with his brother and to minimise his interactions with him.⁴⁹ Finally, A had only complained of a single alleged incident against D (which I have already dealt with above). There were no other incidents that A had complained of which pointed to a pattern of abuse on D's part.

⁴⁹ Transcript, 6 August 2025, p 41 – 45.

143 For these reasons, I dismiss SSP 634.

Conclusion

144 To summarise, all six applications are dismissed.

145 I shall hear parties on costs.

146 Finally, it remains for me to thank both Ms Ang and Ms Tan for their able assistance, and to commend the both of them for their clear and incisive written and oral arguments which assisted me greatly in navigating the various points of law.

Soh Kian Peng
Magistrate

Amelia Ang and Victoria Lynn Chin (Lee & Lee LLP) for the
Father and A;
Tan Ei Leen (Drew & Napier LLC) for the Mother and D.
