

IN THE FAMILY JUSTICE COURTS OF THE REPUBLIC OF SINGAPORE
[2026] SGFC 119

SSP No. 6 of 2026
SSP No. 269 of 2026

Between

XNA

... *Applicant*

And

XMZ

... *Respondent*

**JUDGMENT: APPLICATIONS –
(1) FOR REVOCATION OF PPO & (2) FOR DEO**

Family Law – Family violence – Domestic exclusion orders – Wife seeking domestic exclusion order supplementary to existing personal protection order – Whether necessity for domestic exclusion order must be established separately from necessity for personal protection order

Family Law – Family violence – Domestic exclusion orders – Whether respondent's access to home created or materially aggravated identified risk to applicant – Whether exclusion from home would materially address that risk

Family Law – Family violence – Revocation of personal protection order – Change in circumstances – Whether protective need has ceased – Significance of compliance with order – Women's Charter 1961 s 60A(4) and s 60A(5)

TABLE OF CONTENTS

INTRODUCTION.....	1
SSP 269 – APPLICATION FOR DEO	3
APPLICABLE PRINCIPLES	3
THE CONTEXT IN WHICH THE DEO DETERMINATION IS TO BE MADE	6
KEY ISSUES FOR DETERMINATION	10
INCIDENT 1: 5 AUGUST 2025 – THE SUN PLAZA INCIDENT	11
INCIDENT 2: 8 SEPTEMBER 2025 – THE WIFE’S VIDEO CALL INCIDENT	13
INCIDENT 3: 18 SEPTEMBER 2025 – THE SCHOOL INCIDENT	17
INCIDENT 4: 1 NOVEMBER 2025 – THE UNIVERSAL STUDIOS SINGAPORE INCIDENT	19
INCIDENT 5: 9 JANUARY 2026 – DISCOVERY OF SEXUAL DEVICES	22
INCIDENT 6: 15 JANUARY 2026 – THE HUSBAND’S APPEARANCE OUTSIDE THE HOME	24
INCIDENT 7: 3 FEBRUARY 2026 – PHONE CALL TO THE WIFE’S FRIEND	28
ASSESSMENT OF THE SEVEN INCIDENTS TOGETHER	32
CONCLUSION ON SSP 269	35
SSP 6 – APPLICATION TO REVOKE PPO	35
THE WIFE'S CASE FOR REVOCATION	35
THE HUSBAND’S OBJECTION	36
APPLICABLE PRINCIPLES	36
STEP 1 - CIRCUMSTANCES WHICH GAVE RISE TO PPO 611	39
STEP 2 - HAS THERE BEEN A CHANGE IN CIRCUMSTANCES?	41
STEP 3 - HAS THE PROTECTIVE NEED CEASED?	45

CONCLUSION	48
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XNA

v

XMZ

[2026] SGFC 119

Family Court – SSP No. 6 of 2026; SSP 269 of 2026

District Judge Kow Keng Siong

8 May, 22 June, 30 and 31 July, 24 August 2026

24 August 2026

District Judge Kow Keng Siong:

Introduction

1 This case concerns two applications by the Wife against the Husband. The parties are in the midst of a divorce.

2 On 21 May 2025, the following reciprocal personal protection orders (“**PPO**”) under the Women’s Charter 1961 (“**Charter**”) were made:

(a) **PPO 608** restrains the Husband from committing family violence against the Wife.

(b) **PPO 611** restrains the Wife from committing family violence against the Husband, the son and the daughter.

3 The Wife’s applications before me are as follows.

(a) **SSP 269:** An application under s 60B of the Charter for a domestic exclusion order (“**DEO**”) to exclude the Husband from the matrimonial home.¹

(b) **SSP 6:** An application under s 60A(4) of the Charter to revoke the PPO against her (PPO 611).

4 After a hearing, I dismiss both applications. In short –

(a) The DEO application is dismissed because the evidence does not show that excluding the Husband from the home is *necessary* for the Wife’s protection or personal safety.

(b) Revocation of PPO 611 is dismissed because the Wife has not proved that the risk of family violence resulting in that order has ceased.

5 I digress to state that during the hearing and in her submissions, the Wife claimed that her laptop and other electronic devices had been hacked. As will be evident from this judgement, this claim has no material bearing on the determination of SSP 269 and SSP 6. As such, I will not be addressing it in the judgement.

6 I begin with SSP 269 as the findings that I make there will have a bearing on SSP 6.

¹ The application form also sought a stay-away order of 2 km from the matrimonial home. At the start of the hearing the Wife confirmed that she will not be seeking that order.

SSP 269 – Application for DEO

Applicable principles

Statutory requirements

7 A DEO is supplementary to a PPO. It may be made at the same time as the PPO, or at any later time while the PPO remains in force: s 60B(4).

8 The requirement for making a DEO is in s 60B(2)(a). It states that a court may exclude a respondent from the whole or part of an applicant’s home if it is satisfied, on a balance of probabilities, that the exclusion is “*necessary for the protection or personal safety of the applicant*”. The applicant has the burden of proof.

Necessity requirement for a DEO

9 I make the following observations regarding s 60B(2)(a).

10 First, the word “necessary” is the operative requirement in the provision. It is the same word/requirement that Parliament uses for making a PPO in s 60A(1)(b). In *UNQ v UNR* [2020] SGHCF 21 (“*UNQ*”) at [38], the High Court observed, in the PPO context, that (a) the necessity requirement serves as a *safeguard against unnecessary judicial intervention in family matters*, and (b) the inquiry is fact intensive. In my view, these observations apply equally to s 60B(2)(a).

11 Second, the fact that a PPO is necessary does not mean that a DEO is also necessary. This is because these two orders protect an applicant from family violence in different ways. A PPO protects by restraining the respondent from

committing such violence. A DEO, on the other hand, protects by removing the respondent from the applicant's home. The need for an *additional* and *more intrusive* protection under the DEO must be separately shown. This point is illustrated in the following decisions.

(a) In *WJD v WJC* [2022] SGFC 84 at [39] to [43], the court made a PPO because past threats to the applicant were serious enough to warrant her protection. The court however declined to make a DEO because it was not necessary: the incidents were not recent, no hurt had been caused, and nothing untoward had occurred when the respondent returned to the applicant's home.

(b) In *XSG v XSF* [2025] SGFC 104 at [43] and [44], a PPO was made because the parties would continue to interact due to their young children. A DEO was however denied because the respondent lived in Malaysia and had not visited the applicant's home for at least two years.

12 Third, it is not appropriate to make a DEO simply because a respondent's presence at the home will lead to confrontation with the applicant. As stated earlier, the necessity requirement serves as a *safeguard against unnecessary judicial intervention in family matters*: *UNQ* at [38]. The court must be satisfied that the respondent's continued presence at the home endangers the applicant. To put the point more starkly – the law protects against danger, not merely discord. Otherwise, the mere prospect of friction between estranged family members would convert the exceptional and intrusive remedy of residential exclusion into an ordinary means of regulating an unhappy household.

13 Fourth, in assessing whether a DEO is necessary, I find it helpful to consider the following questions.

(a) Will allowing the respondent access to the applicant’s home create or materially aggravate the protection or personal-safety risk to the applicant? Additionally, will excluding the respondent from the whole or part of the home materially address this risk?

(i) If the answer to the first question is “no”, then a DEO will not be necessary. If the answer to the second question is “no”, then a DEO will not serve to protect the applicant. Either way, the order should not be made.

(ii) Conversely, if (1) allowing the respondent to have access to the home will create or materially aggravate the protection or personal-safety risk to the applicant, and (2) excluding the respondent from the whole or part of the home will materially address this risk, then the necessity requirement for a DEO will be made out.

(b) Whether the respondent respects the applicant’s physical and personal boundaries. If the answer is “no”, then this can be a consideration for a DEO. The following cases illustrate this point.

(i) In *XEP v XEQ* [2024] SGFC 95 at [12(c)] and [21(c)(iv)], the respondent entered and remained in the wife’s bedroom despite being told to leave. A DEO was made to prevent further intrusion.

(ii) In *XYD v XYE* [2026] SGFC 8 at [19] to [22], the court found that the respondent had forced sexual intercourse on the applicant. A DEO was made, limited to the master bedroom.

(iii) See also *XPX v XPW* [2026] SGFC 30 at [98(a)] and *XRZ v XSA* [2026] SGFC 113 (“**XRZ**”) at [25] where the extent to which the respondent respected the applicant’s physical and personal boundaries was similarly held to be a relevant consideration in determining the appropriateness of a stay away order under s 60B(2)(b) of the Charter.

(c) Whether the applicant is in a vulnerable position vis-a-vis the respondent. An example of this is *VJI v VJH* [2020] SGFC 56. There, the applicant was a 75-year-old mother living alone with her adult son. The son subjected the applicant to repeated physical and verbal abuse as well as continual harassment at home. In deciding to make a DEO over the whole premises, the court noted at [56] that “[t]he son would continue to be a threat to the safety of mother if allowed to remain in the same flat with her, *more so when there would be no other person living in the flat to protect her*”.

The context in which the DEO determination is to be made

14 In this case, the Wife relies on seven incidents to show that a DEO is necessary. It is her case that the Husband’s conduct during these incidents has created an “environment of fear, emotional distress, and risk of harm” for her and the children,² and that his conduct was intended to disrupt her work.³

15 Before addressing these incidents, I highlight four features of this case which provide the context in which the DEO application is to be assessed.

² The Wife’s submissions dated 15.08.26 at [4].

³ The Wife’s submissions dated 15.08.26 at [31].

Why PPO 608 was made in the first place

16 *First*, the Wife is seeking a DEO as an *addition* to PPO 608. To determine whether such additional protection is needed, it is necessary to first know what PPO 608 was intended to guard against.

17 PPO 608 was made after an earlier court (“**First PPO Court**”) found that the Husband had committed the following acts of family violence against the Wife at the matrimonial home.⁴

(a) In November 2024, the Wife physically prevented the Husband from taking the daughter to a doctor. Family violence was committed when the Husband tried to remove her hand and injured her arm in the process.

(b) In January 2025, the parties had a “tug of war” over the Husband’s worktable. In the process, the Husband caused the Wife’s old shoulder injury to be strained. The First PPO Court found that the Husband did not intend to cause the injury.

18 In my view, the following features of the Husband’s conduct underlying PPO 608 are relevant to assessing whether a DEO is necessary.

(a) The family violence was *physical* and had occurred in the matrimonial home. There was no finding that the Husband had committed emotional or psychological abuse against the Wife and children.

⁴ These remarks are contained in the Record of Proceedings for SS 2378 of xxx on 21.05.25 from pages 3 to 8.

- (b) The violence was *situational and reactive*, not premeditated. On both occasions, force was used during a physical contest where the Wife was resisting something that the Husband was trying to do. He did not have an intention to injure the Wife.

The criminal proceedings, the bail condition and the Husband's absence from home

19 Second, the Husband has not lived in the matrimonial home since 14 April 2025. The background to this is as follows.

- (a) On 14 April 2025 there was an incident at the matrimonial home. The Husband was alleged to have contravened an expedited protection order (issued in December 2024) then in force by using his elbow to press onto the back of the Wife's neck.
- (b) Criminal proceedings followed promptly. On the same day, the Husband was prevented from returning to the home by a condition of his bail.
- (c) PPO 608 was made on 21 May 2025, while the bail condition was in force. The Husband was therefore already out of the home when the PPO was made.
- (d) On or about 14 January 2026, the Husband was given a discharge not amounting to an acquittal and a 24-month conditional warning. The bail condition ceased on the same day.
- (e) Despite the removal of the bail condition and the conclusion of the criminal proceedings, the Wife refuses to permit the Husband to return to live in the matrimonial home. His presence at the home since

PPO 608 was made in April 2025 has been confined to scheduled child access and to an event that took place on 15 January 2026.

20 Two points bear noting.

(a) One, the Wife has, in substance, had the benefit of the Husband's exclusion from the home for some sixteen months. For nine of those months, the exclusion was imposed by the criminal court. For the remainder, the exclusion has continued because she has not allowed him back and he has not forced the issue.

(b) Two, I do not treat the Husband's sixteen-month absence from the matrimonial home as a reason for making a DEO – i.e., to maintain the status quo. The Wife must show that the Husband's exclusion from the home is necessary for her safety. It must be justified on its own terms.

The conditional warning

21 Third, there is the conditional warning.⁵ Its effect is that if the Husband commits any offence within 24 months of 14 January 2026, he is liable to be prosecuted for the offence alleged to have been committed on 14 April 2025. Contravention of PPO 608 is itself an offence: see s 60A(6) of the Charter. As will be shown later, this has a bearing on whether a DEO is necessary.

The parties are subject to reciprocal PPOs

22 Fourth, the Wife is herself subject to PPO 611. In other words, she has been found to have committed family violence against the Husband and a PPO

⁵ Evidence of this appears in the Wife's affidavit dated 05.02.26 at page 10.

was found to be necessary for his protection and personal safety. In the circumstances, the court must carefully scrutinise the parties' respective roles in the incidents used to support the Wife's DEO application. In particular, the court must identify with precision (a) what conduct is attributable to the respondent and (b) whether *that* conduct justifies the need for a DEO.

Key issues for determination

23 Having set out the context, I turn to the seven incidents relied on by the Wife. I assess each by asking the following questions.

- (a) What does the incident show about the present or future risk of family violence to the Wife ("**identified risk**")?
- (b) Is PPO 608 alone sufficient to address that risk?
- (c) Is the identified risk connected to the Husband's access to the home? Given that PPO 608 was made to protect the Wife from physical abuse (see [17] and [18] above), would his future access endanger her personal safety?

24 If no single incident shows a need for a DEO, I next consider whether the incidents, taken *together*, do so. This is appropriate because several incidents may reveal a pattern or cumulative risk that is not apparent when each is viewed in isolation.

25 I begin with the first incident.

Incident 1: 5 August 2025 – Sun Plaza incident

26 In the afternoon of 5 August 2025, the helper was bringing the children home from school. The Wife was at work at the hospital.

*The Wife's case*⁶

27 According to the Wife, the helper phoned her, crying, at about 1.57 pm. The helper said that the Husband had taken the daughter (then seven years) despite the helper's objection, had crossed the road with her against a red light, had brought her into Sun Plaza, and could not thereafter be found. The Wife contacted the Husband. He replied that he had taken the child to buy a toy and sent a photograph to her to prove this. At about 2.26 pm, the helper texted the Wife to inform that the daughter was back with her.

*The Husband's case*⁷

28 According to the Husband, he had gone to the school to see the children. The daughter became emotional on seeing him and asked repeatedly to spend more time with him. He decided to take her to Sun Plaza to buy a toy, told the helper where he was going, and asked the helper to take the son home first. He answered the Wife when she called, sent the photograph to prove that the daughter was safe with him, and returned the daughter at about 2.18 pm, before her tuition.

⁶ Application form for SSP 269 at incident s/n 5; the Wife's affidavit dated 05.02.26 (A3) at [24] and pages 49 to 51.

⁷ The Husband's affidavit at [37] to [44].

My decision

29 I start by acknowledging that the Husband's conduct that day could understandably cause distress to the Wife – she was at work, the helper was crying, and she did not immediately know where the Husband had taken the daughter.

30 That said, I find that the Husband did not intend to cause distress to the Wife at all material times.

(a) The outing to Sun Plaza was not planned. The helper's evidence supports the Husband's account that the daughter had approached him on seeing him and became emotional.⁸

(b) The Husband did not conceal where he had taken the daughter. He told the helper. He answered the Wife when she called, told her where they were and why, and sent her a photograph. The daughter was back within about half an hour. The Wife accepted that the Husband has not been known to abuse the children.

31 In my view, the Sun Plaza incident does not warrant a DEO.

(a) It involved no conduct directed at the Wife's physical or personal boundaries. She was at work. There was no confrontation.

(b) As stated, the circumstances do not support an inference that the Husband had used the incident to distress the Wife.

⁸ The helper's affidavit dated 25.07.26 at [10].

(c) Most importantly, the incident has no connection with the home. It arose from the Husband's contact with the daughter after school. Nothing regarding this incident shows how allowing him access to the home will endanger the Wife's personal safety.

32 The Sun Plaza incident shows how an impromptu decision by a parent to take a child to buy a toy, without giving prior notice, can cause distress to the other parent. This is a co-parenting issue. A DEO is not an instrument for regulating such issues.

Incident 2: 8 September 2025 – The Wife's video call incident

33 Next, I turn to the second incident. On 8 September 2025, the Husband was exercising interim access to the children at the matrimonial home. He used his phone to let the children speak with his family in Malaysia. The Wife was at work. The helper kept her informed, and the Wife made video calls to the children through the helper's phone during the access.

The Wife's case⁹

34 The Wife relies on two aspects of the Husband's conduct during the access to support her DEO application. *First*, while she was speaking to the children, the Husband "snatched" the helper's phone and "threw" it onto a chair. *Second*, when she resumed the calls with the children, the Husband recorded the conversation on his own phone. She relies on the home CCTV footage to support her account.

⁹ Application form for SSP 269 at incident s/n 4; the Wife's affidavit dated 05.02.26 (A3) at [25]. There are video recordings of the incident in exhibit A4 (blue thumb drive).

*The Husband's case*¹⁰

35 The Husband admits that he had moved the helper's phone aside. He also admits that he had recorded the Wife's conversations with the children. He provides the following explanations for these actions.

(a) During his access, the Wife had repeatedly called the children on the helper's phone while he was facilitating their call with his family. The simultaneous calls were confusing and disruptive for the children. As such, he put the helper's phone aside.

(b) He recorded the Wife's conversation to keep a record of what was said. He highlights, from the recording, that the Wife had questioned the children for about eight minutes about their interactions with him.¹¹ He denies having behaved aggressively or attempting to turn the children against the Wife.

My decision

36 I make the following findings and observations regarding what had happened during the second incident.

Interruption of the Wife's call with the children

(a) I have viewed the CCTV footage. I find no evidence that the Husband had snatched the helper's phone and thrown it onto the chair. The footage shows that he had simply taken the phone and put it aside.

¹⁰ The Husband's affidavit at [47] to [49].

¹¹ The video recording is contained in exhibit R3 (red thumb drive).

(b) I accept the Husband's evidence that his action was a response to the situation at the material time. It is not disputed that he was in the middle of scheduled access and a call with his family. The Wife was simultaneously calling the children through the helper. The children were being drawn into communications from two directions at the same time.

(c) The objective circumstances do not support an inference that the Husband had removed the phone to harass or distress the Wife, or to isolate her from the children. This is demonstrated by the undisputed fact that the helper was able to reconnect the Wife with the children, and a further video call took place. The Husband did not prevent that call from continuing.

Recording of the Wife's conversation with the children

(d) I accept that the Wife could reasonably regard the recording as intrusive and objectionable.

(e) That said, I do not find that the Husband's action amount to family violence. The following bears noting. The parties were already at odds over how access was being conducted and monitored. The Wife had arranged for the helper to report to her on what transpired during the access and was herself calling the children repeatedly. The Husband, in response, recorded the Wife's communications. I mention this, not to allocate blame between the parties, but simply to show that the recording must be considered in context when assessing what inference can properly be drawn from the Husband's conduct.

37 I come to the question of whether this incident shows that allowing the Husband access to the home will endanger the Wife's personal safety such that a DEO is warranted. In my view, the answer is "no".

(a) The Husband did not use his presence at the home to intrude on the Wife's physical space. She was not at home, and he had no contact with her at the material time.

(b) The Husband's interruption of the Wife's call with the children was one-off, reactive, and not sustained.

(c) The incident points to a dispute about how access was being monitored. It shows that the parties have substantial difficulty trusting one another in matters concerning the children. The Wife wished to remain closely informed about what was happening during the Husband's access. The Husband, on the other hand, regarded her communications as disruptive and responded by putting the helper's handphone aside and later recording the calls. Their respective responses generated further conflict. This may call for clearer access protocols.

(d) It however does not call for a DEO. Access-management issues do *not raise a protection issue*. A DEO is warranted only where the Wife's safety is endangered by the Husband's presence in the matrimonial home. It should not be made simply because removing him from the home would reduce opportunities for disagreement with the Wife: see [12] above.

Incident 3: 18 September 2025 – The school incident

*Undisputed facts*¹²

38 I turn to the third incident. The material facts are largely undisputed. On 18 September 2025, the Husband went to see the children at school after lessons ended. On seeing him, the helper phoned the Wife, who was at work. The Wife told the helper to avoid the Husband and take a private-hire car home with the daughter. Before that could happen, the daughter saw the Husband, ran to him and hugged him. The Husband then travelled with the daughter and the helper.

The issue

39 The parties disagree on whether the Husband could see the children at school on a weekday.

(a) According to the Wife, the Husband could not. This was because interim access was on Saturdays, and such access had in any event been suspended by 18 September. She contends that the Husband's unexpected appearance at school had caused the helper great anxiety as the latter feared a repeat of the Sun Plaza incident. The helper's distress, in turn, caused the Wife to be distressed.

(b) According to the Husband, he was entitled to see the children and had gone to the school on 18 September because he missed them. He denies any intention to cause alarm to anyone at the material time.

¹² The Wife's affidavit dated 05.02.26 (A3) at [26] and [27]; the helper's affidavit dated 25.07.26 at [21] to [26] and pages 19 to 20.

My decision

40 I do not see the need to resolve the parties' disagreement on whether the Husband was entitled to meet the children outside of the scheduled access times. This is because even if he was not supposed to do so, the 18 September incident gives little support to the Wife's DEO application. Let me explain.

(a) I accept that the helper was anxious on seeing the Husband, and that her anxiety was transmitted to the Wife. However, the mere fact that an event caused distress does not, without more, show that a DEO is necessary. The evidence must show why allowing the Husband access *to the home* contributes to the risk of physical violence against the Wife. Here, there is no such evidence.

(b) The issue arising from the 18 September incident concerns the Husband's access with the children – not a risk to the Wife. She was at work at the material time. The Husband did not commit any act that can be said to be family violence directed at her.

(c) Further, a breach of child access arrangements occurring at the children's school does not, by itself, show that the Husband had interfered with the Wife's physical or personal boundaries or is likely to do so in the future.

(d) Just as in the 8 September incident, the issue arising from the 18 September incident stems from the fact that the parties sharply disagree over when and how the Husband may interact with the children. His decision to attend at the school without prior agreement has generated further mistrust and conflict. However, *a dispute about the boundaries of child access is not, without more, a reason for a DEO.*

Incident 4: 1 November 2025 – The Universal Studios Singapore incident

41 I turn to the next incident. On 1 November 2025, the Husband was scheduled to have access from 11.00 am to 3.00 pm. He arrived at about 11.12 am. Unknown to him, between six and eight of the Wife’s relatives from Malaysia had arrived at about 2.00 am for a surprise birthday celebration for the son. The Wife was at work at the material time.

The Wife’s case¹³

42 According to the Wife, the helper told her over the phone that the Husband had arrived. From the CCTV, she saw that her relatives stayed in a bedroom and did not interfere with his access.

43 The dispute began when the Husband saw the helper applying sunscreen to the children and learnt that the relatives planned to take them to Universal Studios Singapore (“USS”). He accused the relatives of interfering with his access. The Wife regarded his manner as aggressive. She called the Police and left work to return home.

44 On arriving home, she confronted the Husband over his aggressive behaviour towards her relatives. When the Police came, the Husband asked them to arrest her, saying he had “exclusive access” to the children. She showed the Police messages which, she says, showed that the relatives were to go to USS first and that she would bring the children only after 3.00 pm.

¹³ Application form for SSP 269 at incident s/n 3; the Wife’s affidavit dated 05.02.26 (A3) at [29] to [35] and [79].

45 According to the Wife, the Husband behaviour that day disrupted her work and caused her distress.

The Husband's case¹⁴

46 According to the Husband, he was surprised to find the Wife's relatives present when he arrived at the matrimonial home. He understood that his access was to proceed without third-party interference.

47 When he saw the sunscreen being applied on the children and was told that the relatives planned to take them out, he approached the relatives to make clear that his access ran until 3.00 pm. He denies being aggressive. According to him, the Wife escalated matters on returning home. He cooperated with the Police and left when they asked him to do so.

The recordings

48 Significant parts of the 1 November incident were recorded.

(a) A recording at about 11.44 am shows the Husband pointing his forefinger at the Wife's sister while asking why the relatives were taking his daughter out. The sister denies that this was the plan. Parts of the exchange are muffled. There are also parts in a language other than English. No translation of the exchange was tendered.¹⁵

(b) A separate recording captures part of the later confrontation between the parties. The Wife can be seen speaking in a highly agitated

¹⁴ The Husband's affidavit at [22] to [36] and page 62; the helper's affidavit dated 25.07.26 at [27] to [32].

¹⁵ The video recording is in exhibit A4 (blue thumb drive).

manner, accusing the Husband of raising his voice at her relatives and “creating a scene”. The Husband can also be heard explaining that the relatives should not take the children out during his access.¹⁶

(c) A further recording shows the Wife telling three police officers that the Husband had breached her PPO and that she was “traumatised” by his conduct towards her relatives in front of the children.¹⁷

My decision

49 The key issue is whether the 1 November incident shows that the Husband’s presence at the matrimonial home will endanger the Wife’s personal safety and thus support a DEO. In my view, the answer is “no”.

(a) The confrontation that day arose from an unusual and specific trigger. The Husband had arrived for scheduled access and unexpectedly found a large group of the Wife’s relatives in the home, followed by what appeared to be preparations to take the children out during his access. Whether or not he had read the situation correctly, those circumstances explain why a dispute arose. It is relevant to note that the Wife was not in the home when the dispute with the relatives arose.

(b) The recordings do not show family violence at the Wife. Instead, they show heightened emotions from various parties. They show the Husband pointing at the Wife’s sister and raising his unhappiness of interference with his child access. They also show the Wife reacting angrily for a sustained period, and raising her voice at the Husband for

¹⁶ The video recording is in exhibit R4 (black thumb drive).

¹⁷ The video recording is in exhibit A4 (blue thumb drive).

having created a scene. Despite the harsh tone and accusations directed at him, the Husband showed restraint and spoke calmly to the Wife. The fact of the matter is that she was not in any physical danger from the Husband at all material times.

(c) In my view, the Husband's request for the Police to arrest the Wife (because he had "exclusive access") does not bring the Wife's case very far. This is because this request was based on the Husband's understanding that the Wife had breached the access order. Even if his understanding is wrong, this would not show that the Husband's access to the home endangers the Wife's safety such that a DEO is required.

Incident 5: 9 January 2026 – Discovery of sexual devices

50 I turn to the next incident. On 9 January 2026, the Wife, assisted by the helper, was searching the home for the children's health booklet. She broke the lock on a drawer – which belonged to the Husband – and found sexual devices and related items inside.

The Wife's case¹⁸

51 According to the Wife, she was concerned that such items were kept in a home with young children. At the hearing, she described the discovery as "traumatising", that the items were connected in her mind with the way the Husband had previously "manipulat[ed]" her, and that their discovery subjected her to "mental torture".

¹⁸ Application form for SSP 269 at incident s/n 2; the Wife's affidavit dated 05.02.26 (A3) at [40] and pages 107 to 110. A video recording of the Wife going through the locker with the helper is contained in exhibit A5 (green thumb drive).

*The Husband's case*¹⁹

52 According to the Husband, the sexual devices and related items were not his. Under cross-examination, he did not dispute that some other materials in the locked drawer were his. In any event, he contends that the discovery of the sexual devices and related items is irrelevant – as it discloses no family violence or danger.

My decision

53 I do not consider it necessary to determine whether the Husband owns the sexual devices and related items. This is because even if they belong to him, such evidence carries little weight in proving that a DEO is necessary.

(a) The items were found in a *locked* drawer during a search. There is no evidence that he had placed the items in a place where she would find them or had used them to commit family violence against her.

(b) The Wife's allegation that the items represent the way he had previously "manipulated" her is serious. A serious allegation *must be particularised* before an inference can be drawn from it. On the evidence, I cannot identify what prior conduct she is referring to, how these objects relate to that conduct, or why their presence shows a present or future risk of family violence to her.

(c) The Wife has failed to explain (i) how the presence of sexual devices and related items in a locked drawer shows that there is a risk of

¹⁹ The Husband's affidavit at [16] to [21].

family violence to her, and (ii) why excluding the Husband from the matrimonial home would reduce that risk.

(d) The Wife's concern for the children does not advance her DEO application.

(i) First, the DEO application in this case must be assessed from the perspective of *the Wife*. It must be necessary for *her* protection – not the children's.

(ii) Second, a DEO is *supplementary* to a PPO: see [7] above. There is no PPO protecting the children from their father.

(iii) Third, and in any event, the items were in a *locked* drawer and were found only after the Wife had broken the lock. There is no evidence that the children had ever accessed them.

Incident 6: 15 January 2026 – The Husband's appearance outside the home

54 I turn to the next incident. It arose when the Husband was preparing to return to the home after the bail condition that had kept him away came to an end: see [19] above.

Undisputed facts

55 The following facts are not disputed.

(a) On 12 January 2026, the Husband's lawyers wrote to the Wife's lawyers ("**12 January letter**").²⁰ They informed that the criminal

²⁰ The Wife's affidavit dated 05.02.26 (A3) at pages 84 and 85.

proceedings were expected to conclude by 14 January 2026, after which the Husband would be permitted to return home. The Husband's lawyers gave notice that he intended to return on 15 January 2026 and live in the spare bedroom.

(b) At the divorce mediation on 13 January 2026, the Wife told the judge that she needed two to three more weeks to prepare herself and the children for the Husband's return to the home.

(c) On 15 January 2026, the Husband's lawyers sent a further letter ("**15 January letter**"). It enclosed a document recording that the Husband had been given a discharge not amounting to an acquittal on 14 January 2026. The 15 January letter also stated that the investigation officer had confirmed there was no impediment to the Husband returning home. The letter further stated that the Husband would attend at the home between 2.00 pm and 4.00 pm that day *only to place his belongings there*. He would defer resuming occupation until 24 January 2026. (At the hearing, the Wife confirmed that she did not object to his returning to live at the home on 24 January 2026.)

*The Wife's case*²¹

56 The Wife was at home to prepare for Pongal. At about 3.24 pm, she saw the 15 January letter, forwarded by her lawyer. She became "extremely fearful" because of the short notice given and because she was home alone with the daughter – the helper had taken the son to tuition at the material time. She contacted the police investigation officer for advice. Shortly afterwards, the

²¹ Application form for SSP 269 at incident s/n 1; the Wife's affidavit dated 05.02.26 (A3) at [38] to [41].

Husband appeared outside the home. She did not open the door. When the investigation officer did not respond, she called 999.

57 The Police arrived 10 to 15 minutes later. At the hearing, the Wife clarified that she was not worried about the Husband. Her concern was that his return would create “a lot of problems” for the children.

*The Husband’s case*²²

58 According to the Husband, his return to the matrimonial home was first communicated to the Wife through his lawyers on 12 January. When the Wife asked for more time, he agreed not to move back on 15 January and limited that day to dropping off his belongings. This was because his landlord had required him to vacate his rented premises on the same day.

59 On 15 January 2026, the Husband stayed calm when the Wife did not let him in. He did not force his way in. When the Police attended, he complied with their directions. He was eventually allowed to leave his belongings in the home. He left thereafter.

My decision

60 I accept that the prospect of an estranged spouse returning to a shared home after months away can be deeply unsettling for the Wife, particularly during divorce proceedings and under reciprocal PPOs. I accept that receiving the 15 January letter shortly before the Husband arrived at the home had heightened her anxiety.

²² The Husband’s affidavit at [9] to [15]. A video recording of the incident is in exhibit A5 (green thumb drive).

61 That said, the court must distinguish two distinct matters. *One*, the anxiety caused by the Husband's return. *Two*, whether a DEO is necessary to protect the Wife from family violence from the Husband – which is the issue that I must determine.

62 On this issue, I find that the events leading up to, and including, 15 January provide little support for a DEO. If anything, they point the other way.

63 First, the Wife's anxiety about the Husband returning home was not based on a fear that he would commit family violence against her.

(a) The Wife did not object to the Husband returning to live at the home on 24 January 2026. Her concern was mainly with the timing and manner of his return.

(b) She gave evidence that she was not worried about the Husband himself. Her concern was that his return would cause disruption and conflict for the children.

64 Second, when the Wife asked for more time, the Husband agreed to delay his return until 24 January. Before entering the home on 15 January, he gave notice through his lawyers and went there only to leave his belongings. This is significant because it shows that he took the Wife's concerns into account rather than insisting on an immediate return.

65 Third, the 15 January incident is significant in showing how the Husband is likely to now respond to conflict with the Wife. Let me elaborate.

(a) The First PPO Court found that a PPO was necessary because the Husband had resorted to physical violence when the Wife resisted his attempts to do something at the matrimonial home: see [17] above.

(b) On 15 January 2026, the Husband encountered a similar situation that led to PPO 608. His attempt to deposit his belongings at the matrimonial home had met resistance from the Wife – she refused to open the door and called the Police.

(c) The Husband’s response on 15 January was very different from those he had displayed in November 2024 and January 2025: see [17] above. He did not resort to force or other forms of self-help. Instead, he waited, dealt with the Police, and complied with their directions.

66 At the time of the events in [64] and [65], the Husband was subject to PPO 608 and the conditional warning. He remains subject to these restraints. In my view, the undisputed evidence of his actual conduct provides a more reliable guide to the risk that he poses if allowed access to the matrimonial home than speculation about what might happen.

Incident 7: 3 February 2026 – Phone call to the Wife’s friend

67 I turn to the final incident. It allegedly occurred on 3 February 2026, the day before the divorce mediation.

*The Wife's case*²³

68 On that day, the Wife learnt from her friend Ms X, who lives in Malaysia, that the Husband had telephoned Ms X. According to Ms X –

(a) The Husband said that the Wife had to agree to all his terms at the mediation. If she did not, he would publish adverse comments about her on social media.

(b) During the call, he showed Ms X, on a one-time-view basis, a video of the Wife disciplining the son and photographs of her with Mr Z.

(c) Ms X told the Husband that she did not know the facts, advised him not to carry out the threat, and said that she would speak to the Wife.

69 Alarmed by what she heard, the Wife made a police report. At the time of the hearing, the matter was under review by the Police and the Attorney-General's Chambers.²⁴

The Husband's case

70 The Husband denies making the call to Ms X and circulating photographs.²⁵ According to him, photographs of the Wife and Mr Z originated from Mr Z. He produced a recording, said to be from March 2026, of Mr Z complaining about the Wife to the Husband's sister-in-law. (The Wife accepted

²³ Application form for SSP 269 under "Latest incident(s) of family violence"; the Wife's affidavit dated 05.02.26 (A3) at [42].

²⁴ The Wife's correspondence with the Attorney-General's Chambers is in exhibit A4 (blue thumb drive).

²⁵ The Husband's affidavit at [1] to [8].

that the voice on the recording was Mr Z's.) The Husband also produced photographs of the Wife and Mr Z in India in 2024, which he says he had received from Mr Z. (The Wife accepted that some of the photographs as genuine and disputed others.)

The allegation is serious

71 The allegation concerning the 3 February 2026 incident is serious. The Husband is alleged to have tried to pressure the Wife into accepting his divorce terms by threatening to publish adverse material about her on social media.

72 The fact that the threat was communicated to Ms X, rather than directly to the Wife, would not make it irrelevant. Conduct can amount to emotional or psychological abuse even if it was not directed personally at the family member concerned – so long as it is capable of being perceived by that family member: s 58B(6) of the Charter.

The allegation has not been proved

73 There is however an evidential hurdle for the Wife. She did not hear the conversation herself. Her evidence of what the Husband had allegedly said is based entirely on what Ms X later told her.

74 Section 62 of the Evidence Act 1893 requires that oral evidence of a fact which could be heard must be adduced through the witness who heard it. In this case, Ms X was not called. No affidavit from her was tendered. In the circumstances, the claim that the Husband had called Ms X and had made the threat have not been sufficiently proved.

75 In my view, the Wife's police report and the fact that the matter is under review by the Police and the Attorney-General's Chambers do not fill the evidential gap. An investigation does not establish the truth of what is investigated.

76 For completeness, I place no weight on the Husband's evidence about Mr Z in deciding whether the call to Ms X had occurred. Evidence that Mr Z had or circulated some photographs may explain the origin of the relevant materials. It does not prove that the Husband did not later use them to threaten the Wife.

Even if the allegation were proved

77 My finding above disposes of the 3 February incident.

78 For completeness, even if the evidence that the Husband had called Ms X and had made the threat has been sufficiently proved, I find that this gives little support to the Wife's DEO application. The threatened act was publication online. It can be carried out from *anywhere*. A DEO, which excludes the Husband from the home, would not stop him from posting material online: see [13(a)(i)] above.

79 This does not mean that the threat, if proved, carries no legal implication. It may constitute a breach of the existing PPO or trigger other remedies. However, these are distinct questions. For present purposes, the relevant question is whether this incident shows that the Husband must be excluded from the matrimonial home for the Wife's personal safety. It does not.

Assessment of the seven incidents together

80 Individually, the incidents do not justify the making of a DEO. I next consider whether the incidents, taken *together*, provide such a justification.

The Wife's case at the highest

81 At its highest, the Wife's case is as follows.

(a) PPO 608 was made on the basis that the Husband had used physical violence on two occasions against her at the matrimonial home. After these two incidents, the Husband went on to breach an expedited PPO by using force against her at the home in April 2025. This resulted in criminal proceedings against him.

(b) There is evidence showing the Husband to have acted unilaterally (Sun Plaza incident, the school incident and sudden appearance at the home on 15 January 2026) and to have been aggressive when he was at the matrimonial home (USS incident).

(c) The Husband's actions, as revealed through the incidents, have caused distress to the Wife and disruptions to her work.

(d) The parties have not lived together since April 2025. Cohabitation is likely to increase the opportunities for acrimony and for the Husband to resort to family violence to settle their disputes.

Why a DEO is not necessary

82 The issue is whether excluding the Husband from all or part of the home is *necessary* for the Wife's personal safety. I answer this question in the negative.

(a) The fact that the parties have not cohabitated since April 2025 does not discharge the Wife's burden of proof. The issue is not whether the parties would have less conflict if they lived apart. Almost certainly they would.

(b) The issue is whether additional restraint in the form of a DEO is necessary. In this regard, the Husband is now subject to two restraints which did not exist at the time of the family violence in November 2024 and January 2025.

(i) The first is PPO 608. It has been in force since May 2025.

(ii) The second restraint is the conditional warning. It has been in place since 14 January 2026. For the next 16 months (i.e., until 13 January 2028), any act of family violence against the Wife exposes the Husband not only to prosecution for breach of PPO 608, but also to revival of the April 2025 charge. In other words, the deterrent consequence of breach of PPO 608 has been doubled.

(c) Since the incidents of family violence in November 2024 and January 2025, the Husband had experienced the criminal process. He had been prevented from returning to the matrimonial home and seeing his children because of the bail condition.

(d) The evidence shows that the Husband has learnt from these lessons and is now aware of the serious consequences if he were to run afoul of the law. This is reflected in his behaviour when faced with conflict with the Wife.

(i) Since PPO 608, the Husband did not use or threaten force against the Wife.

(ii) On 5 August 2025, when the Wife confronted him regarding his whereabouts with the daughter, he promptly provided the relevant information and sent her a photograph to allay her concerns.

(iii) On 8 September 2025, when the Wife interrupted his access by repeatedly calling the children on the helper's phone, he did not confront her. Instead, he simply put the phone aside – and later allowed her to communicate with the children again.

(iv) On 1 November 2025, when the Wife confronted the Husband harshly in the home while her relatives and the children were there, he did retaliate in kind. Instead, he explained his unhappiness to her in a calm voice.

(v) On 15 January 2026, when the Wife denied him entry into his own home, the Husband did not force the door or verbally abuse her. Instead, he dealt with the Police when they arrived.

(e) The Husband has shown a consistent preference for formal channels to resolve issues with the Wife, for instance through his lawyers, instead of relying on self-help. The fact that the Husband has

demonstrably regulated his conduct in response to legal restraints shows that the existing restraints are working.

(f) As for the Wife's complaint that her interactions with the Husband had caused distress and disrupted her work, the incidents she relies on mainly concern child access. They show a need for clearer arrangements to manage conflict, not a need for a DEO. Clearer ground rules for access would better address the source of the stress than a DEO.

Conclusion on SSP 269

83 To sum-up, the Wife has not satisfied me, on a balance of probabilities, that excluding the Husband from all or part of the matrimonial home is necessary for her personal safety.

SSP 6 – Application to revoke PPO

84 Next, I turn to the Wife's application to revoke PPO 611 made against her for the protection of the Husband, the son and the daughter.

The Wife's case for revocation

85 In her affidavit, the Wife submits that PPO 611 ought to be revoked for the following reasons.

49 ... the continued existence of PPO No. 611/xxx creates a false and prejudicial narrative that I am a source of risk, when the objective record shows that I have been the primary stabilizing caregiver for the children and that independent authorities have consistently found the children to be safe in my care.

50 ... maintaining PPO No. 611/xxx is no longer necessary or proportionate and is not in the best interests of the children. Rather than

providing protection, the order has contributed to ongoing tension, repeated police attendance, and the children's exposure to conflict.

86 At the hearing the Wife added that she has changed since the PPO was made – she has devoted herself to the children and their education. This has resulted in them writing her daily notes of appreciation which they paste on the wall. Additionally, she has completed her counselling sessions.

87 In closing submissions, the Wife contended that the PPO “is no longer necessary, justified, or reflective of the actual circumstances”. This is because she has complied fully with it, has stopped using the cane, and there has been no breach or incident that would justify its continuation. She also submits that the Husband has used the PPO to threaten her.

The Husband's objection²⁶

88 The Husband opposes the Wife's application. He highlighted that he had not himself applied to revoke PPO 608 (made against him to protect the Wife) because things were “not calm” between them.

Applicable principles

Whether the PPO is still necessary

89 The power to revoke a PPO is provided in s 60A(4) of the Charter. In determining a revocation application, s 60A(5)(b)(i) requires a court to consider “whether there has been any change in the circumstances which required the [PPO] to be made”. When applying s 60A(5)(b)(i), it is important to consider

²⁶ The Husband's affidavit at [62] to [65].

the purpose of a PPO. In this regard, s 60A(1) provides that a PPO may be made where family violence has been or is likely to be committed and the order is necessary for the protection or personal safety of the family member.

90 Given the purpose of a PPO, the ultimate question when considering a revocation application is thus *whether, since the PPO was made, circumstances have changed such that the order is no longer required*: *XDB v XDC* [2025] SGFC 44 (“*XDB*”) at [5(a)].

Analytical framework

91 In my view, an inquiry into this ultimate question logically involves three steps.

- (a) **Step 1.** *Identify the circumstances which gave rise to the PPO.*
- (b) **Step 2.** *Determine whether the applicant has shown a change in those circumstances since the PPO was made.*

Considerations that are relevant to this inquiry include the following: (i) whether the circumstances, causes or triggers associated with the earlier family violence have been resolved or remain present; (ii) whether there is credible evidence of rehabilitation, insight, treatment or sustained behavioural change on the part of the applicant: *XDB* at [5].

- (c) **Step 3.** *Determine whether, by reason of the change, the PPO is no longer necessary for the protection or personal safety of the protected persons.*

(i) Considerations that are relevant to this inquiry include the following: (1) the period since the last act of family violence; (2) whether there has been any family violence or breach of the PPO since it was made, and if so its nature, seriousness and recency; (3) the parties' present and likely future living arrangements and interactions, including those arising from the children and pending proceedings; (4) whether significant antagonism remains, and any identifiable circumstances in which it may translate into family violence: *XDB* at [5].

(ii) At this juncture, I wish to address consideration (2) and a point raised by the Wife. She submits, as one of the grounds for revocation, that she has complied fully with PPO 611 and that this is evidenced by the fact that there has been no breach. In assessing the weight of this factor, the court must examine the reason for an incident-free period. Is it due to a sustained behavioural change on the applicant's part? If so, this is a factor in favour of revocation. *Or* is it due to the removal of the triggers for conflict or the absence of opportunity for interaction between the parties? If so, the incident-free period may be an equivocal factor. *Or* is the incident-free period simply because the PPO has worked? If so, it would be circular to say that the PPO is no longer needed because it has successfully prevented the conduct it was meant to restrain.

92 The inquiry is evaluative. No single consideration is decisive. The question remains whether the purpose of the PPO has ceased.

93 With this, I proceed to examine the merits of the Wife’s application, beginning with the circumstances which gave rise to PPO 611.

Step 1 – Circumstances which gave rise to PPO 611

94 The circumstances which gave rise to PPO 611 are set out in *XMZ v XNA* [2025] SGFC 60 (“**XMZ**”). They are as follows.

(a) *Physical discipline of the children.* The Wife was found to have used unreasonable physical force in disciplining the children. On 27 July 2023, she repeatedly hit and caned the son. The punishment began for a corrective purpose but later became fuelled by anger: at [9] to [12] and [52(a)]. On 22 April 2024 she again repeatedly hit and caned the children. The punishment was found to be gratuitous and excessive: at [28] to [36] and [52(c)]. (To be clear, the court that made PPO 611 (“**Second PPO Court**”) did not condemn all parental discipline. Its concern was that in the Wife’s case, anger could turn correction into excessive force.)

(b) *Lack of insight.* The Wife was found to lack insight into what was wrong with her method of discipline, which increased the likelihood of recurrence: at [55] to [57].

(c) *Threats.* The Wife was found to have made repeated threats to take her own life and the children’s lives to seek attention or a particular response: at [58] to [62].

(d) *Conduct towards the Husband.* The Wife was found to have continually harassed the Husband, and to have slapped and harassed him on two days: at [52(b)] and [52(d)].

(e) *Triggers*. The Second PPO Court noted that the parties were in an acrimonious relationship and were embarking on divorce, and that disputes over the children and differing approaches to parenting were likely to create further occasions for conflict: at [65(c)]. The Wife's tendency to communicate with the Husband in an inflammatory and controlling manner was also found to be relevant to the risk of future harassment: at [66] to [69].

95 PPO 611 was therefore made to address three risks: (a) excessive physical discipline of the children; (b) threats of physical harm to herself or the children, made under stress or to exert pressure; and (c) harassing and aggressive conduct towards the Husband when conflict escalated.

96 The Wife has completed counselling. This deserves acknowledgement. That said, completion of counselling is evidence of engagement with a process. It is not, on its own, evidence that the process has achieved its purpose. Whether the Wife's insight and behaviour have changed must be judged from her post-PPO conduct. In particular, her assertion that she has changed since PPO 611 was made must be tested against the protective needs highlighted in [94] and [95] above.

97 The question is whether the developments since May 2025 show that the need for protection have ceased. I now address this question, beginning with the children's protective needs.

Step 2 – Has there been a change in circumstances?

Physical discipline of the children

98 The Wife claims that she has stopped being physically violent towards the children.

99 This claim is contradicted by the helper. Her evidence is as follows.²⁷

(a) During her employment from April 2025 to March 2026, she saw the Wife use a cane on the children, when they did not listen to her, on between one and five occasions.

(b) In late 2025, she saw the Wife hit the son on the back near his left shoulder, leaving a red mark, which she photographed on her phone. According to the helper, the photograph was later deleted by the Wife when the latter went through her phone. However, she managed to retrieve it in or around July 2026 and sent it to the Husband.

100 The Wife submits that the helper’s evidence should be rejected on the grounds that (a) there were discrepancies in her accounts, (b) the helper had failed to produce the photograph of the cane mark on the son, and (c) the helper was assisting the Husband to “frame” her.

101 I have considered these submissions carefully. Having seen and heard the helper give evidence and be cross-examined by the Wife, I accept the helper’s evidence summarised in [99] above. These are my reasons.

²⁷ The helper’s statutory declaration dated 04.04.26, exhibited in the Husband’s affidavit (exhibit R1) at page 115.

(a) The Wife submits that the helper had contradicted herself regarding whether the cane was in fact used on the children or merely to threaten them.²⁸ In my view, it is clear from the helper's evidence that the Wife had used the cane on the children. I accept that there were some discrepancies on minor details in the helper's evidence. I find no material inconsistency in her evidence regarding the caning incidents. I also note that she could not recall the date and time of the caning incident.²⁹ This is to be expected, given the passage of time.

(b) Regarding the failure to tender the photograph of the cane marks, the Husband explained that he did not include it in the evidence because he did not think that it related to the Wife's application.

(c) Regarding her claim that the helper had conspired with the Husband to frame her, I find that the Wife has failed to substantiate it. No detail, evidence, or basis was provided to support her claim. It appears that the claim is based on pure speculation.

(d) In any event, I find that the helper did not have any interest to serve by "framing" the Wife. Her evidence was forthright and balanced. She did not embellish her evidence against the Wife. Neither did she tailor her evidence to advance the Husband's case. Notably, she has given favourable and adverse evidence for both parties.

102 Given the above, I find that the helper has disproved the Wife's assertion that she stopped using the cane after PPO 611 was made. This finding is material

²⁸ The Wife's submissions dated 15.08.26 at [121], [162].

²⁹ The Wife has raised issue with the helper's failure to produce the photograph: the Wife's submissions dated 15.08.26 at [117] to [119].

as it shows that the concern which led to the PPO being made has not been resolved.

Pressure directed at the children

103 The second reason for PPO 611 was the Wife's use of threats and pressure on the children. The following evidence relating to the Sun Plaza incident and the Wife's video call incident suggest that this concern has also not been adequately resolved.

(a) Based on recordings of the Wife's conversation with the daughter on 5 August 2025,³⁰ she questioned the child for more than 17 minutes about her interactions with the Husband. Her tone was irritated and harsh. The daughter sounded hesitant and apprehensive. The Wife was upset because the daughter had gone with the Husband, had allegedly "lied", and had not asked the Husband to take the son as well. Towards the end, the Wife told the helper she was "really irritated".

(b) According to the helper, on 8 September 2025, on returning home, the Wife questioned the children about their conversations with the Husband and his relatives earlier that day, why they had been so excited to see him, whether they loved their father more than her, and whether they wanted to live with him. She had also told them to pack their belongings so that she could send them to him.³¹

104 The above evidence shows that the children's relationship with the Husband remains capable of provoking a strong emotional response in the Wife,

³⁰ Exhibit A5 (green thumb drive) at time stamp 05:02. A further recording is in exhibit A4 (blue thumb drive).

³¹ The helper's affidavit dated 25.07.26 at [18] and [19].

and that this response can be directed at the children through sustained and emotionally charged questioning. This is the same dynamic – frustration directed at the children – that contributed to the making of PPO 611.

The Wife as a loving and effective parent

105 In coming to the above views, I accept that the Wife loves the children and is devoted to their education.

106 So did the Second PPO Court. It expressly accepted that the Wife loved the children. It however also found that love for a child and inappropriate responses to frustration are not mutually exclusive: *XMZ* at [55] to [57]. This finding remains apt. In this case, the evidence of the Wife’s devotion does not address the evidence of her continued physical punishment and emotionally charged questioning of the children.

The risk to the Husband

107 Next, I turn to the Husband’s protective needs. The Second PPO Court found that the Wife’s harassing conduct arose during intense disputes with the Husband and predicted that the divorce and disagreements over the children would provide further occasions for conflict: *XMZ* at [65(c)].

108 In my view, these triggers for conflict have not disappeared. The parties remain in divorce proceedings. The evidence in SSP 269 shows that the children remain the flashpoints for dispute. At the hearing, it is evident that the parties continue to have strong emotions against each other. The Husband candidly admitted that he did not apply to revoke the reciprocal PPO 608 (made against him to protect the Wife) because things were “not calm” between them.

109 I have not overlooked the fact that there is no evidence of physical violence or harassment by the Wife against the Husband since PPO 611 was made.³² This stands in her favour. However, I also note that the parties have not lived together since April 2025 – *first*, because of the Husband’s bail condition, and *later*, because the Wife has not permitted his return. In other words, the opportunities for direct contact between the parties have been limited: see [91(c)(ii)] above.

Step 3 – Has the protective need ceased?

110 I turn to the final step in assessing the Wife’s application – whether the need for PPO 611 has ceased. I begin by addressing two points she had raised.

The allegation that the Husband has abused the expedited protection order

111 The Wife claims that the Husband had used an expedited protection order (“**EPO**”) to threaten her. The background for this claim is as follows. On 14 January 2025, the Husband had filed multiple reports to the Police, Child Protection Service and the National Anti-Violence and Sexual Harassment Helpline. At the material time, the court had issued her with an EPO following her filing of SSP 6.³³

112 I am unable to accept the Wife’s submission.

113 First, it is unclear what is the nature of the “threat” and “abuse” that the Wife is alleging against the Husband in relation to the EPO.

³² The Wife’s submissions dated 15.08.26 at [13], [15].

³³ The Wife’s submissions dated 15.08.26 at [11], page 4 ([13] to [16]), [21] and [22].

114 Second, if the Wife is claiming that the Husband had used the EPO to make complaints to the authorities, then this fact alone does not bring her case very far.

(a) A protection order exists to protect the person named in it (“**protected person**”). If such a person files a complaint to the authorities merely to secure protection under the order, then it would be unreasonable to contend that the protected person has abused the order.

(b) I also do not find it objectionable for a protected person to tell a person subject to a protection order (“**restrained person**”) that the latter’s conduct is a breach the order. This is a warning of intended enforcement, rather than an improper threat. The fact that subsequent investigations may cause the restrained person anxiety or inconvenience does not by itself convert a legitimate recourse to a protection order into oppression.

(c) For completion, the above positions remain valid even if the protected person’s complaint ultimately do not result in any action by the authorities, unless there is proof that the complaint was made dishonestly or abusively.

115 Third, even if misuse of the EPO had been established, that would not automatically require the revocation of PPO 611. It bears highlighting that misuse of a protection order and the continuing need for protection are *distinct* questions. The court would still have to determine whether the circumstances which made PPO 611 necessary have changed sufficiently such that the Husband and children no longer require its protection. On the findings that I have made above, the Wife has not established this.

The argument that the PPO is counterproductive

116 Next, I turn to the Wife's submission that PPO 611 has contributed to confusion by the children and their exposure to conflict between their parents.³⁴

117 I take this point seriously because the children's welfare is engaged. However, the submission does not, in my view, support revocation. The tension and conflicts arose from disputes over access and the Husband's return to the home – not from the existence of PPO 611. The appropriate response to this issue is not to remove the protection afforded to the children in the form of PPO 611. Instead, it is for the parties to resolve their disputes amicably.

PPO 611 is still necessary

118 Assessing the matter holistically, I find that two of the three risks that PPO 611 sought to address – (a) excessive physical discipline of the children and (b) aggressive behaviour towards the Husband – are shown by positive evidence to persist, albeit at a lower intensity. The triggers for future family violence identified by the Second PPO Court remain present and are likely to intensify with cohabitation.

119 I therefore find that the Wife has not discharged her burden of proving, on a balance of probabilities, that PPO 611 is no longer necessary for the protection or personal safety of the Husband, the son and the daughter.

³⁴ The Wife's submissions dated 15.08.26 at [12].

Conclusion

120 For the above reasons, I dismiss SSP 6 and SSP 269.

Kow Keng Siong
District Judge

Wife and Husband in person.