

IN THE FAMILY JUSTICE COURTS OF THE REPUBLIC OF SINGAPORE
[2026] SGFC 123

FC/OADV 331/2026
HCF/DCA 60/2026

Between

YIG

... Applicant

And

YIH

... Respondent

GROUND OF DECISION

Catchwords: Primary School Registration Exercise

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**YIG
v
YIH**

[2026] SGFC 123

Family Justice Courts – OADV 331/2026

District Judge Goh Zhuo Neng
23 July, 17 August 2026

2 September 2026

District Judge Goh Zhuo Neng:

1. This is my grounds of decision in respect of applications filed by the parents of X, a child who is due to be registered for Primary School entry in 2027.

(a) Father – OADV 331 of 2026 filed on 30 June 2026.

(b) Mother – SUM1777 of 2026 filed on 10 July 2026.

2. I heard parties on 23 July 2026 and ordered that the Father shall be allowed to decide on the primary school where the child is to be registered. In the event that there is no availability at the primary school of the Father's choice, the child shall be registered at such other school that the Father may secure. I

also awarded the Father \$1,000 in costs, being \$500 in each application. The Mother filed her appeal on 5 August 2026 and I set out below my grounds of decision.

A. BACKGROUND

3. The parties were married in 2019 during which they had one child – X. Divorce proceedings were commenced in March 2022. Interim judgment was made on 4 July 2022.

I. The Order

4. Joint custody of X was agreed by consent on 3 January 2024 and on 6 February 2024, the Court ordered (“**Order**”), inter alia, that parties would have shared care and control of X, and from the week of 14 to 21 February 2024 onwards, the arrangement would be:

- (i) Mother – Wednesday, 6.00pm to Sunday 12.00pm.
- (ii) Father – Sunday 12.00pm to Wednesday 12.00pm.

5. While other orders were made under the Order in respect of overseas access, and access during special dates and other holidays, these do not directly impact X’s school going schedule as the shared care and control arrangement does. Therefore, I do not concern myself with them.

II. The Applications

6. Essentially both parents were seeking to have X enrolled in a Primary School of their choice, and their prayers addressed Phase 2A, Phase 2C and 2C Supplementary. By the time I heard their applications on 23 July 2026, Phase 2A (9 July 2026, 9.00am to 10 July 2026, 4.30pm) had passed. The only remaining phases for admission were:

- (a) Phase 2C (28 July 2026, 9.00am to 30 July 2026, 4.30pm).
- (b) Phase 2C Supplementary (17 August 2026, 9.00am to 18 August 2026, 4.30pm).

7. Therefore, I will focus on aspects of their prayers which are relevant to these phases. i.e. that both parents were seeking to have X enrolled in specific schools in Phase 2C and then sole authority to enrol X in a school of their choice under Phase 2C Supplementary.

B. MATERIAL CHANGE IN CIRCUMSTANCES JUSTIFYING VARIATION

8. The Women's Charter s.128 provides that the Court may vary an order for the custody, or the care and control of a child if it is satisfied that the order was based on misrepresentation or mistake of facts, or where there had been a material change of circumstances. A principled and pragmatic approach will be taken bearing in mind that any variation is made for the welfare of the child (*AZB v AZC* [2016] SGHCF 1, [32]).

9. There was no dispute that the Order did not make specific provision on Primary School Registration issues and that X's coming of age for registration amounted to a material change in circumstances.

10. Therefore, I will be varying the Order to make provision for which parent shall have the authority to enrol X in Primary School. I now go into detail below.

C. PRIMARY SCHOOL REGISTRATION – FACTORS FOR CONSIDERATION

11. It would be useful at this point to address some of the issues which are considered and raised when determining which parent should have sole authority to register a child in Primary School. These factors are not exhaustive or fully determinative of the issue and I stress that they are only part of an inquiry to determine what is in the best interests of the Child.

- (a) The reputation of the school. This is a popular but often fruitless path of debate. Well-meaning parents would argue that their Child would have the best start if they were placed in a school that is perceived to provide a superior curriculum and prestige. This fails to take into account whether the Child might adapt well to the environment and also that places in these schools would be oversubscribed and difficult to get into. Moreover, placing emphasis on these factors risks turning all applications on primary school registration into a ranking exercise and marginalizes other factors which in my view are more important.

- (b) Alumni association. This issue is usually raised together with the reputation of the school. However, the benefit here is distinct and relevant only insofar as it improves the Child's opportunity to obtain a place in the school.
- (c) Distance the Child lives from the school. This is a useful factor in evaluating the issue. This is especially the case where the Court is being asked to choose between extremities, e.g. between a school that is very close and a school that is very far from the Child's primary residence. The impact of distance is exacerbated especially in the morning when the Child has to wake up in the wee hours of the morning to attend primary school assembly which usually begins at 7.30am. The distance will also impact on the availability of places given in priority to children who live within 1-2km of the school.
- (d) Which parent has borne/bears the greater share of responsibility in caregiving for the Child. This is the parent who understands the Child's schedule and needs and generally strong weight would be given to their choice of primary school.
- (e) Availability of places. This is obvious. If a parent advocates for a specific school which has no or very few available places, then that option should not be preferred. Specific events may influence this factor, such as alumni association which gives preferential status for Phase 2, and the distance the Child lives from the school which I have discussed above at (c).

- (f) Conduct of the parties. This is very fact sensitive, but behavior which negatively affects the ability of the Child to be enrolled in Primary School would be taken into account.

D. MY DECISION

12. In the present case, I decide that the Father shall be allowed to decide on the primary school where the child is to be registered. In the event that there is no availability at the primary school of the Father's choice, the child shall be registered at such other school that the Father may secure. This broad authority is given so as not to limit the scope of the Father's authority to enrol X in any school of his choice in Phase 2C and 2C Supplementary.

13. Key to this decision is that I regard travelling time and time spent preparing X for school as being a determinative factor.

- (a) Both parents opted for schools which were no more than 5 minutes from them. The flipside was that they lived about 30-40 minutes away from each other, so adopting their choice of school would mean that X travelled about 30 minutes each way.
- (b) The Mother proposed an option of School A, which was 7-10 minutes from X's current preschool. This was in the interest of maintaining a status quo. I did not think this was in the best interests of X. Preschool start timings were more flexible and later than those of Primary school. School A was also 20 minutes from both parents' homes.

- (c) Therefore allowing the Father the sole authority to make the choice of Primary School would give X three mornings a week where he would not need to wake up as early to get to school. This was a clear advantage the Father had over the Mother. The Father would also be able to prepare X for three full days of school on Sunday, as opposed to the Mother who only needed to prepare him for two full days of school.

14. The weight given to the above factor is unique to the present case as most of the other factors were neutral. The schools close to the parties were not particularly short of places and under the order X spent an equal amount of time with both parents which meant neither of them could claim to be a primary caregiver.

15. The Mother argued that I should place weight on the Father's conduct in these proceedings. She claimed to be the first to raise the issue of primary school registration in April 2026, and that it was the Father's unwillingness to engage productively with her that resulted in the applications being filed. Reference was made to my decision in *VPN v VPO* [2026] SGFC 6 ("*VPN*") where I had considered the Father's conduct in the primary school registration exercise when awarding the Mother sole authority to determine all issues relating to the Child's education.

16. I would clarify that the facts in *VPN* are distinguishable from the present case. The Father in *VPN* took nearly three months to provide a substantive reply to the Mother's initial email to him on primary school registration. When he engaged, it was with unpleasant and discourteous language. Hence my statement at *VPN*, at [60]:

“I take the view that decisions of such importance do require more responsiveness and courtesy. Parties are entitled to their views and while I appreciate that it can sometimes be frustrating to persuade someone who holds a different view, there is no need to behave as unpleasantly as the Father did. Referring to the Mother’s parents, calling her names, belittling her level of education, using her mental health issues against her, this sort of behavior does not have a place in the co-parenting process.”

17. In the present case, I considered the Father’s conduct in negotiating with the Mother on the primary school issue. I appreciate that the Father was not willing to compromise wholly with the Mother in his engagement, but he did not act in an unpleasant manner as did the Father in *VPN*. Given the binary schooling options available to parties here and the lack of a middle ground choice with appeal, it would have been difficult for parties to find a compromise. So at best his conduct would be a neutral issue.

18. It is precisely these sort of impasses which unfortunately need to be resolved by litigation. Here, I note it was the Father who decided to file his application first to have this issue resolved expeditiously. The Mother’s application only followed some 10 days later. So he could hardly be accused of delay either.

E. CONCLUSION AND COSTS

19. Accordingly, I came to my decision for the reasons above. The Father sought \$1,000 in costs for both applications which I find fair considering his need to file a reply affidavit to the Mother’s application as well as written submissions and the cost of appearance before me for a half day hearing.

Goh Zhuo Neng
District Judge

Carrie Gill Kaur [Harry Elias Partnership
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