

IN THE FAMILY JUSTICE COURTS OF THE REPUBLIC OF SINGAPORE
[2026] SGFC 135

FC/ECAO 17/2025
FC/ECAO 15/2026

Between

YDR

... *Applicant*

And

YDQ

... *Respondent*

**JUDGMENT:
APPLICATIONS TO ENFORCE ACCESS ORDER**

Family Law – Access – Enforcement of child access order under s 126B of the Women's Charter 1961 – Show-cause procedure – Burden and standard of proof

Family Law – Access – Children refusing to see access-parent – Care-parent's duty to take reasonable steps to facilitate access – Whether sufficient cause shown for non-compliance

Family Law – Access – Make-up access – Whether missed weekday dinner-access sessions may be consolidated into longer weekend daytime sessions under s 126B(3)(a) and (4) of the Women's Charter 1961

Family Law – Access – Make-up access – Whether to order interim make-up dinner access pending access evaluation report – Whether to defer make-up overnight access

Family Procedure – Access order – Enforcement of child access order under s 126B of the Women's Charter 1961 – Whether prior formal service of access order required where respondent had actual knowledge of its terms

Evidence – Judicial interview of children – Whether appropriate to interview children to determine disputed past breaches of access order

Evidence – Witnesses – Whether appropriate for the Court to call child witnesses to determine disputed past breaches of access order

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YDR

v

YDQ

[2026] SGFC 135

Family Court – ECAO 17/2025; ECAO 15/2026

District Judge Kow Keng Siong

21 July, 12 October 2026

12 October 2026

District Judge Kow Keng Siong:

Introduction

1 These proceedings concern two applications under s 126B of the Women's Charter 1961 to enforce an access order. The applications are ECAO 17/2025 ("**First Application**") and ECAO 15/2026 ("**Second Application**").¹

2 The parties have two children: a son born in March 2016 and a daughter born in August 2017 ("**Children**"). The Mother has care and control of them.

¹ The First Application, filed on 07.08.25, concerns alleged non-access on 25.06.25 and 28.06.25. The Second Application, filed on 06.05.26, concerns alleged non-access from 08.08.25 to 01.02.26.

3 The Father seeks to enforce his access rights made in a court order on 20 June 2025 ("**First Access Order**"). The order was made by consent following mediation. Its terms are reproduced in **Annex A1**. For these proceedings, the key terms are as follows.

- (a) Daytime access from 23 to 25 June 2025 and on 28 June 2025;
- (b) Alternate overnight weekend access from 4 July 2025; and
- (c) Tuesday and Thursday dinner access during weeks in which the Father did not have overnight weekend access.

Key issues for determination

4 Access did not take place on numerous occasions: see **Annex A3** ("**Relevant Occasions**"). The Father alleges that the Mother had thus breached the First Access Order.² The Mother accepts that access did not take place on the Relevant Occasions. She however advances four points to resist the Father's applications.

- (a) The First Access Order was defective and not binding on her.
- (b) In any event, she cannot be held accountable for breaches that occurred before the order was formally served on her.
- (c) The service of the Second Application was defective.
- (d) She did not prevent access: it was the Children who refused to meet the Father.

² Father's submissions dated 18.08.26 at [1.3]; Father's submissions dated 01.09.26 at [4.2].

5 It bears noting that a *further* access order was made by consent on 2 February 2026 ("**Second Access Order**"). It introduced different arrangements, including limited Saturday and overnight access sessions, supervised exchanges, and weekly Tuesday dinner access. The Father contends that the First Access Order remains valid despite the Second Access Order. The Mother disputes this.

6 The key issues for determination are thus as follows.

- (a) Was the First Access Order valid and binding on the Mother during the Relevant Occasions?
- (b) Can breaches committed before the order was formally served be enforced?
- (c) Was the Second Application properly served? If not, can the Court still hear it?
- (d) Has the Father proved the alleged breaches beyond reasonable doubt, having regard to the Mother's explanation?
- (e) Is the First Access Order still operative, or has it been superseded by the Second Access Order?
- (f) If the breaches are proved, what enforcement measures should be ordered under s 126B(3)?

7 In brief, my decision on these issues is as follows.

- (a) The First Access Order bound the Mother from the day it was made. Her disagreement with its terms did not entitle her to disregard it.

- (b) She is answerable for breaches committed before the order was formally served because she knew its terms throughout.
- (c) The irregular service of the Second Application caused her no prejudice.
- (d) The Father has not proved breaches on 25 and 28 June 2025. Those occasions were closely connected with a distressing incident, and the evidence leaves a reasonable doubt.
- (e) The Father has proved, beyond reasonable doubt, that the Mother failed to provide 13 sessions of weekend overnight access and 24 sessions of weekday dinner access. The children alleged reluctance to meet the Father does not relieve her of the duty to take reasonable steps to facilitate access. She has not shown that she took any.
- (f) The First Access Order has been superseded, prospectively from 2 February 2026, by a consent order made on that date.
- (g) I order make-up dinner access with safeguards, and an Access Evaluation Report ("AER"). Make-up overnight access and other enforcement measures are reserved until the AER is available.

8 I shall now elaborate on the grounds for my decision.

Was the First Access Order valid?

The Mother's case

9 I begin with the Mother's case that the First Access Order is not binding on her. According to her, this is because it omitted terms, allegedly discussed during mediation, that she considered essential. These concerned (a) joint

custody of the Children, (b) her authority over their educational matters, (c) her sole care and control of the Children, and (d) a requirement that the Father's access was to be subject to the Children's wishes ("**alleged missing terms**"). She relies on an affidavit from her former lawyer, Ms Kasturibai Manickam ("**Ms Kasturibai**") to support her case.

My decision

10 I reject the Mother's submission that she did not need to comply with the First Access Order because of the alleged missing terms.

(a) A consent order derives its legal force from the order made by the court – not from the parties' underlying agreement discussed during mediation: see the authorities cited in *YDQ v YDR* [2026] SGFC 71 at [19(a)]. An alleged omission does not, without more, entitle a party to disregard an order that has been made.

(b) The proper course is to seek clarification, correction, variation or setting aside, as the circumstances warrant. The Mother did not take such a course until 27 November 2025 – more than five months after the order was made.

11 Further, the contemporaneous conduct of the Mother and her lawyers strongly shows that she had initially accepted the First Access Order as valid and binding.

(a) The Mother facilitated access on 23 and 24 June 2025, as required by cl 1 of the order.

(b) On 24 June 2025, the Father's lawyer sent an email setting out the access arrangements.³ These arrangements are materially similar to the terms of the First Access Order. There is no contemporaneous evidence that the Mother disputed the contents of that email.

(c) The scheduled access on 25 June 2025 did not take place. That day, the Father's lawyer emailed the Mother's lawyers, alleging that the Mother had refused to grant access in breach of the access arrangements.

(d) On 26 June 2025, Mr A Rajandran, one of the Mother's lawyers, replied. He "*put on record* that [the Mother had] facilitated access, *as per agreement reached* at the Mediation" [emphasis added]. He explained that the Children were reluctant to leave with the Father and asked that access continue at DSSA in the presence of a counsellor.⁴ The tenor of Mr Rajandran's reply shows that he accepted the First Access Order to be operative.

(e) On 27 June 2025, the Father's lawyer asked for a draft of the First Access Order to be approved. Ms Kasturibai stated unequivocally that the draft was "good to be approved", and asked Mr Rajandran to approve it.⁵ She made no mention of the alleged missing terms. This email materially undermines the Mother's case that there was no agreement on the First Access Order. Ms Kasturibai and the Mother did not provide an explanation for this material discrepancy.

³ Father's affidavit dated 07.08.25 at page 15.

⁴ Father's affidavit dated 07.08.25 at pages 17 to 21.

⁵ Father's affidavit dated 07.08.25 at pages 27 and 28.

12 In rejecting the Mother's case regarding the alleged missing terms, I have considered the following.

(a) On 28 June 2025, Mr Rajandran asked the Father's lawyer not to extract the order while he took instructions.

(i) There can be two possible reasons for Mr Rajandran's request. *One*, he needed time to confirm the terms of the order with the Mother. *Two*, the Mother might have raised concerns. It is not clear from Mr Rajandran's email which of these reasons was operating at the material time.

(ii) Mr Rajandran's request does not show that the First Access Order failed to reflect the terms the court made. Nor does it explain why such concerns were not raised earlier despite numerous opportunities. There is also no explanation why Mr Rajandran had earlier "put on record" (on 26 June 2025) that the Mother had facilitated access "as per agreement reached at the Mediation", or why Ms Kasturibai stated on 27 June 2025 that the draft was "good to be approved".

(b) On 27 November 2025, the Mother applied to set aside the First Access Order.

(i) It bears emphasis that the application does not suspend the Mother's obligation to comply with the order – it remained operative until it has been set aside by the Court. A contrary view would allow a party to suspend a court order unilaterally by simply filing a setting aside application. This would undermine the authority of court orders and cannot be right.

(ii) The Mother later withdrew her application, after the Second Access Order was made by consent on 2 February 2026. That order governs the parties' future access arrangements. Nothing in the Second Access Order suggests that it retrospectively extinguishes liability for breaches committed while the First Access Order was operative. The First Access Order therefore remained binding from 20 June 2025 (the day it was made) to 1 February 2026. The breaches that I have found all occurred while the First Access Order was operative.

Can breaches committed before the First Access Order was served be enforced?

The Mother's case

13 Next, I turn to the Mother's submission that she cannot be held liable under s 126B for breaches committed before 31 July 2025 – the date the First Access Order was served on her. For this submission, she relies on the principle that, in committal proceedings, action may be taken only for breaches committed after the order was served on the respondent.⁶

My decision

14 I disagree with the Mother's submission – enforcement under s 126B may be taken for breaches committed before the First Access Order was served on her on 31 July 2025. These are my reasons.

⁶ Mother's submissions dated 05.10.26 at [6] to [10].

- (a) The Mother has cited no provision or authority for her submission.
- (b) The hearing before me are not committal proceedings. It arises from applications filed under s 126B(6). This provision expressly treats such hearings as distinct from committal proceedings.
- (c) Neither s 126B nor Part 3A of the Family Justice (General) Rules 2024 ("**2024 Rules**") makes liability depend on formal service of the access order before the alleged breach.
- (d) On the contrary, Part 3I, paragraph 46D(3)(d) of the Family Justice Practice Directions 2024 states that in an application under s 126B, the applicant is to state in an affidavit –

... whether the respondent *has been served with a copy of the relevant access order and / or is aware of the contents of the access order*, and if so, the details of such service and / or how the respondent became aware of the contents of the access order, with supporting materials (if any) exhibited;

[emphasis added]

The disjunctive formulation in paragraph 46D(3)(d) is significant. If formal service were invariably a condition of liability, the alternative inquiry into whether the respondent was "aware of the contents of the access order" would be unnecessary. Paragraph 46D(3)(d) is consistent with, and supports, the reading of s 126B set out above.

15 To be clear, the above does not mean that an access order may be enforced against a person who is unaware of the obligation that it imposes.

(a) The principle of fair notice applies. The court must be satisfied that the respondent knew the material terms of the order and intentionally engaged in the conduct constituting non-compliance.

(b) Formal service is one means of establishing that knowledge, but not necessarily the only one. Depending on the evidence, knowledge may be established by showing that the respondent participated in drafting the terms, was present when the order was made, or by other evidence of awareness of the obligation.

16 Here, it is not disputed that the Mother knew the terms of the First Access Order at all material times. They were reached at a mediation attended by her lawyers. Soon after a district judge recorded the terms, the Father's lawyer referred to them in several emails to her lawyers. Her lawyers did not object, and in fact confirmed them: see [11] above. In the circumstances, the absence of formal service of the order before 31 July 2025 does not, without more, excuse her non-compliance before that date.

Was the Second Application properly served?

The Mother's case

17 Next, I come to the Mother's complaint that as of 16 June 2026, the Father did not serve on her three exhibits in his affidavit supporting the Second Application.⁷

⁷ Mother's affidavit dated 16.06.26 at [5] to [8].

My decision

18 I accept that service of the Second Application was imperfect. However, such a procedural irregularity must be assessed by its nature, its materiality and its impact on the Mother's ability to respond fairly to the application.

19 In this regard, I find that the irregularity did not prejudice the Mother's conduct of her case.

(a) Two of the missing exhibits were the First Access Order and the First Application. The Mother had already received them much earlier – before the Second Application was made.

(b) The third exhibit was a schedule of the alleged missed access sessions. An updated copy of the schedule is in the Father's affidavit of 19 June 2026, which was served on the Mother before the hearing began. It is not disputed that the Father did not see the Children from 25 June 2025 to 22 January 2026. The occasions on which access did not take place could therefore readily be identified by applying the terms of the First Access Order.

20 Accordingly, the irregularity in the service of the Second Application does not warrant its dismissal.

Has the Father proved the alleged breaches?

21 Next, I turn to whether the Father has proved the breaches on the Relevant Occasions, having regard to the Mother's explanation. I begin by setting out the applicable principles.

Applicable principles

The care-parent's obligation

22 A care-parent is obliged to take positive steps and make reasonable efforts to comply with an access order. The obligation is not discharged merely by showing that the care-parent did not actively obstruct access: *VRI v VRH* [2023] SGHCF 8 ("**VRI**") at [16]; *TTZ v TTY* [2024] SGHCF 46 ("**TTZ**") at [19].

23 The obligation continues to apply even where a child refuses access. A care-parent cannot abdicate parental responsibility by simply giving in to the child's wishes: *TTZ* at [46]; *XXK v XXL* [2026] SGFC 3 ("**XXK**") at [18] to [22]. In assessing whether the obligation was discharged, courts consider the following four matters: *TTZ* at [42] to [48]; *XPW v XPX* [2025] SGFC 120 ("**XPW**") at [43] to [47] and [63] to [70].

(a) *The child's refusal.* What is its nature, intensity, persistence and apparent cause? The child's age, maturity and experiences are also relevant factors. It is well settled that a child's wishes, while important, are not determinative on the issue of access: see e.g., *WKM v WKN* [2024] 1 SLR 158 ("**WKM**") at [57] and [58].

(b) *The care-parent's conduct.* Did the care-parent cause, encourage, reinforce or acquiesce in the refusal?

(c) *Reasonable efforts.* What practical steps did the care-parent take to understand and address the refusal, and to facilitate access? In considering this factor, the Courts recognise that there can sometimes be

practical and emotional limits to a parent's influence over a child: *TTZ* at [20] and [45] to [48].

(d) *The child's welfare.* The child's welfare, not the wishes of either parent, is paramount. Accordingly, the child's willingness or reluctance must be factored into what reasonable efforts required: *TTZ* at [45]. The duty does not require a parent to compel access at all costs. An important question is whether insisting on access in the particular circumstances would have created a genuine and disproportionate risk of harm to the child.

Burden and standard of proof

24 The present applications are brought under s 126B. Such proceedings are structured as follows.

(a) *Legal burden and standard.* The applicant bears the legal burden of proving the breach throughout. If breach is established, the respondent can be liable to a fine of up to \$20,000 or imprisonment of up to 12 months, or both: s 126B(3)(e). In *YFC v YFD* [2026] SGFC 86 ("*YFC*") at [91] to [99], the court applied the criminal standard of proof beyond reasonable doubt, given these potential consequences and the safeguards applicable to committal. I respectfully agree and apply that standard here.

(b) *Prima facie breach.* The applicant must identify the relevant obligation under the access order and adduce sufficient evidence of its apparent breach.

(c) *Showing cause.* If the court is satisfied that there are *prima facie* grounds of breach, it must direct the respondent to show cause, that is, to explain the breach: P 3A, r 6(1) of the 2024 Rules. The respondent may do so by oral evidence, by calling witnesses, by affidavit, or a combination of these: P 3A, r 6(2). When showing cause, the respondent has the *evidential burden* to put forward evidence capable of raising a reasonable doubt as to whether the breach occurred. This does not reverse the legal burden, which remains on the applicant.

(d) *Determination.* After the respondent has provided his or her explanation, the court must then review all the evidence and determine whether the respondent (i) knew the material terms of the order, and (ii) intentionally failed to take reasonable steps to comply with it. An explanation that is bare, unparticularised, or inconsistent with the respondent's own conduct may fail to raise a reasonable doubt.

25 How can a respondent raise a reasonable doubt in the applicant's case? In this regard, I note that s 126B implemented recommendations in the 2019 Report of the Committee to Review and Enhance Reforms in the Family Justice System.⁸ The Committee described the show-cause procedure as follows:

126 ... the Committee recommends adopting a “show cause” procedure for these applications – the access parent will only be required to show a *prima facie* breach of the access terms, following which the care parent will have the *burden to explain* why access could not take place. There will be situations where access with the child could not be carried out for *legitimate reasons*. This could be a statutory defence to such applications. Should there be *legitimate reasons*, the court will dismiss the application and costs may be ordered against the applicant. Potential adverse costs orders would discourage or preclude parents

⁸ Accessible at – <https://isomer-user-content.by.gov.sg/27/063d100a-7841-4fdf-b6e8-8d47b28b1494/annex.pdf>

from litigating their access disputes where there are *legitimate reasons* for failure to grant access.

[emphasis added]

26 The "burden to explain" described by the Committee is, in my view, the evidential burden at [24(c)]. To assess whether a reasonable doubt has been raised, it is therefore useful to ask *whether the respondent has put forward a legitimate and sufficient reason why access did not, or could not reasonably, take place*. This is an objective, fact-sensitive inquiry. In addition to the matters at [23], there is one further important consideration: *causal connection*. The respondent must establish a sufficient causal link between the reason given and the failure of access. The mere existence of a difficulty does not justify non-compliance. For example, a child's illness does not automatically justify withholding access if the access-parent could adequately care for the child: see e.g., *VRI* at [14] and [15]; *YFC* at [85] to [88].

27 I now apply these principles to each occasion of the failed access.

The events of 25 June 2025

28 The first occurred on 25 June 2025. The handover was to take place at a mall. It is not disputed that the Mother brought the Children there on the day in question for access.

The parties' case.

29 The Father claims that after arriving at the mall, the Mother ran off with the Children to the information counter and told the staff to call the Police.

30 The Mother gives a different account. On seeing the Father, the Children told her they did not wish to go with him. She asked him to give them time to

adjust, as they had already been with him for access on the two previous days. He insisted on proceeding. When they left, he followed them and repeatedly tried to persuade the Children to go with him, despite her pleas not to embarrass them. A commotion ensued and the Children became anxious. At one point, the Children ran towards the road to get away from the Father. She ran after them, steered them to the mall's customer service counter and asked for help. The Police were called.⁹

The video

31 The Mother made a short video recording of the events that day. It lasts for almost two minutes and shows the following.

- (a) The Father repeatedly asked the Children, in a non-threatening manner, whether the Mother had told them not to go with him. They denied.
- (b) Asked why they did not want to go with him, the Children replied that they just did not want to.
- (c) When the Father tried to coax them, the daughter appeared irritated and upset. At times, she said loudly that they did not want to go with him. The son appeared to find the repeated questioning amusing. He smiled at the Father while saying that he did not want to go.
- (d) The Mother cannot be seen in the video and is not heard saying anything.

⁹ Mother's affidavit dated 26.08.25 at [15] to [24]; Mother's affidavit dated 16.06.26 at [16] to [18].

My decision

32 The video has important limitations. It does not show what happened before filming began, the Mother's earlier interactions with the Children, or what happened afterwards. It cannot establish that the Mother made no effort to encourage access before the recorded exchange. Nor does the son's apparent amusement exclude the possibility that he later became distressed.

33 On the issue of whether the Mother had discharged her duty to facilitate access, three circumstances stand in her favour. *First*, she brought the Children to the designated handover venue. *Second*, she had facilitated access on the two preceding days. *Third*, there is no affirmative evidence that she encouraged or engineered the Children's refusal.

34 The Father has not disproved the Mother's account of the escalation during the access: see [30] above. In the absence of contrary evidence, I cannot exclude it.

35 The Mother could reasonably have been expected to encourage the Children to comply with the order, to understand their reluctance and, where practicable, to help resolve it. Their unexplained refusal did not automatically end her responsibility. However, once the encounter escalated and genuine safety concerns arose, she was not required to insist on the handover at all costs.

36 On balance, I am not satisfied beyond reasonable doubt that the Mother's conduct on 25 June 2025 was an intentional failure to take reasonable steps to facilitate access. That access failed is undisputed. Whether, and how far, the failure is attributable to a breach by the Mother is uncertain.

37 I therefore decline to find a breach on 25 June 2025.

The missed access on 28 June 2025

38 It is not disputed that the Mother did not bring the Children to the access venue on 28 June 2025. The correspondence between the lawyers in the lead up to this missed access is important.¹⁰

(a) On 26 June 2025, Mr Rajandran told the Father's lawyer that the Children were reluctant to proceed. He proposed that access continue at DSSA in the presence of a counsellor.

(b) On the same day, the Father's lawyer rejected the proposal and insisted that access proceed in accordance with the First Access Order.

39 Given the above correspondence, I am not sure that the missed access on 28 June 2025 was the result of a failure by the Mother to take reasonable steps to facilitate access.

(a) The missed access occurred three days after the eventful 25 June incident.

(b) The contemporaneous proposal by the Mother's counsel shows that she had tried to facilitate access. The proposal sought an alternative that took account of the Children's welfare after the events of 25 June. She did not purport to terminate the access unilaterally.

(c) In my view, the Mother may be allowed some latitude to seek a safer arrangement immediately after such an incident. (To be clear, that latitude is necessarily short-lived. It does not extend to suspending access indefinitely.)

¹⁰ Father's affidavit dated 07.08.25 at pages 19 to 21.

40 Given the above, I find that the Father has failed to prove, beyond a reasonable doubt, that the missed access on 28 June 2025 was an actionable breach of the First Access Order by the Mother.

The missed access from August 2025 to January 2026

*The Mother's case*¹¹

41 The Mother accepts that access did not take place from August 2025 to January 2026. According to her, the "primary reason" for this was that the Children refused to see the Father, having been traumatised by the events of 25 June 2025. She decided not to force them to attend for their welfare. Having seen the Father's conduct on 25 June, she felt that she could no longer trust him to respect the Children's wishes. This is especially so his history of "inappropriate" behaviour with the daughter and how he responded to rejection.

Gaps in the Mother's case

42 The position for the missed access from August 2025 to January 2026 is materially different from those of the missed access discussed earlier. Unlike the missed access on 25 June, the Mother did not bring the Children to the access venue. Unlike the missed access on 28 June, she did not provide any evidence of what she did to comply with the First Access Order. The Mother's explanation is essentially that the Children continued to refuse access because they had been traumatised on 25 June.

¹¹ Mother's affidavit dated 26.08.25 at [25] to [28]; Mother's affidavit dated 16.06.26 at [19] to [23]; Mother's submissions dated 05.10.26 at [30] and [31].

43 I do not reject the possibility that the Children had been genuinely distressed by the 25 June incident. Neither do I expect the Mother to force a distressed child to meet the Father if this would cause that child harm.

44 However, to raise a reasonable doubt, the Mother's explanation must provide some basis for concluding that further reasonable efforts would have been inappropriate or futile. It must explain why the Children's unwillingness prevented access over a prolonged period, and what the Mother did to address it. No such explanation was provided. For instance, there is no evidence of what occurred before any of the missed access, of what the Children said or did on those occasions, or of what step the Mother had taken to understand or address their alleged reluctance to meet the Father. Such evidence is important because the reasonable-efforts inquiry is inherently fact-sensitive. What could reasonably be expected of the Mother depended on the Children's actual condition, their expressed concerns, and the practical alternatives available at the time. A bare assertion of continuing trauma does not allow the Court to assess those matters at all.

45 I should also add that the Mother asserted, for the first time in re-examination, that the son had experienced suicidal ideation. This is a serious assertion. However, there is no evidence of when the ideation arose, how it manifested, what professional assessment or intervention followed, how it affected the son's ability to participate safely in access, or why every subsequent access session was incapable of proceeding.

46 The Mother relied on allegations in her affidavit in OSG 53/XXX about the Father's past conduct to explain why she did not persuade the Children to attend the access. I make the following observations.

(a) The allegations include incidents of the Father committing self-harm in 2015, threatening and coercive behaviour (including towards the Children in 2018 and 2019), showering naked with the daughter from about age two to five, leaving her unsupervised, and removing the Children from the Mother's care for an extended period in 2024.¹²

(b) These are serious matters. If established, they could give substantial grounds for concern about the Children's safety. The Mother reported these incidents to the Police and to Child Protective Service.

(c) I note that these agencies decided to take no further action. The Mother had also withdrawn OSG 53/XXX. In the circumstances, the relevant allegations have not been judicially determined. During the hearing, the Father has not meaningfully addressed them. In the circumstances, I make no finding that he had committed the alleged misconduct. Nor do I find the allegations false merely because the authorities took no further action.

(d) As against the above, two undisputed facts are particularly relevant. *First*, the Mother facilitated *overnight* access on 8 to 9 June and 15 to 16 June 2026 without raising any concern.¹³ *Second*, she consented to *overnight* access in both the First Access Order (20 June 2025) and the Second Access Order (2 February 2026). These facts call for an explanation. Why did she prevent all access from August 2025 to January 2026 due to safety concerns about the Father when she had

¹² Mother's affidavit dated 26.08.25 at [25]; Mother's affidavit for OSG53/XXX dated 13.05.24 at [18] to [74], [99] to [105]; Statement of Particulars dated 07.06.24 at [12] to [17].

¹³ Mother's submissions dated 05.10.26 at [31.3].

agreed to overnight access – both before and after this period? She provided no such explanation.

Should the Court obtain evidence from the children

47 At this juncture, I address one point raised by the Mother. She submits that the Court should have interviewed the Children to ascertain why they refused access.¹⁴

48 The Father opposed the Children participating in the hearing for two reasons. *First*, he had had no meaningful contact with them for some time and was concerned that their evidence would be coached by the Mother. *Second*, testifying in court was likely to be traumatic for the Children.

49 The Mother's submission raises an important question – Should the Court fill the evidential gaps in her case, either by calling the Children to testify or by interviewing them in the parties' absence?

50 In my view, the answer is no. The better course is for the Court to decide whether cause had been shown on the available evidence.

The Court should not call the children to testify

51 The Court should not call the children to testify for the following reasons.

- (a) The Mother bears the evidential burden of showing cause: see [24(d)] above. It is for her to decide whether it is appropriate to call the

¹⁴ Mother's affidavit dated 26.08.25 at [21].

Children for this purpose. That decision involves considerations such as the Children's maturity (they were about nine and eight at the material time), the quality of their recollection, and the impact of testifying on their welfare, including stress, divided loyalties and further involvement in parental conflict. Whatever her reasons, she had chosen not to adduce the Children's evidence.

(b) The Court's task is to decide whether the Mother has made out her case based on the evidence that she provided. The judge-led approach in the Family Justice Courts and the 2024 Rules does not require the Court to obtain *further* evidence that might help cure the evidential weaknesses in her case. Indeed, judicial impartiality requires the opposite – the Court should refrain from unnecessarily interfering with how she conducts her case. *VYR v VYS* [2022] SGHCF 24 illustrates this point. There, the wife applied for protection orders and ended her cross-examination of the husband after one question. On appeal, she argued that the judge should have done more to put her case to the husband. The High Court disagreed, observing that the judge-led approach does not extend to the court advancing a litigant's case on her behalf, and that the court remains the adjudicator of the parties' competing cases: at [19].

(c) The above does not mean a court may never direct that evidence be obtained from a child. A court may consider such information necessary, for instance, to decide whether a proposed course of action is *in the child's welfare*. This is an independent judicial function exercised in the child's interests. It is a different thing to call a child to testify so as to help a care-parent show cause in breach proceedings. The latter

scenario risks the Court being seen as taking over, and siding with, that party's case.

The Court should not interview the children in the parties' absence

52 The reasons above apply equally to why a judicial interview should not be conducted with the Children.

53 The Mother submits that it was unfortunate that the Court declined to interview the Children, adding that "[t]he Court must examine why the children refuse access and whether the refusal was caused or encouraged by the care-parent".¹⁵

54 This submission is misconceived.

(a) It shifts to the Court the Mother's burden of adducing evidence to show cause. This is wrong in principle and courts have rejected a similar move by parties. An example is *WYV v WYW* [2024] SGFC 44. There, the father applied to strike out the mother's application to vary his access by excluding overnight access on the basis of alleged sexual abuse. The mother asked the Court to interview the children to ascertain their wishes. The Court declined to do so, holding that she should not be allowed to plug the gaps in her case by urging the court to interview the children: at [83].

(b) It bears emphasis that the principal function of a judicial interview is to understand a child's *present* circumstances and wishes, for the purpose of deciding *future* custody, care and access

¹⁵ Mother submissions dated 05.10.26 at [40].

arrangements: *WKM* at [27] to [30]. It is not intended to obtain evidence for findings on disputed past events.

(c) Further, a judicial interview is generally unsuitable for fact-finding. What the child says during such an interview is confidential: *WKM* at [40], [43], [70] to [71]. In the circumstances, the parties would not know what the child had said – and thus cannot test the information provided in cross-examination or respond to it in submissions: *WKM* at [74]; *CSW v CSX* [2023] SGHC(A) 23 at [85].

Findings on breach

55 To sum up – I am satisfied beyond reasonable doubt that, in respect of 13 sessions of weekend overnight access and 24 sessions of weekday dinner access between 15 August 2025 and 30 January 2026: **Annex A3** –

- (a) The Mother knew the material terms of the First Access Order: [16] above;
- (b) She deliberately decided not to bring the Children to access: [41] above;
- (c) She took no identifiable step to address the Children's alleged reluctance to meet the Father or otherwise to facilitate access: [42] and [44] above; and
- (d) Her explanation does not raise a reasonable doubt. It is unparticularised and uncorroborated by any professional evidence. It is also inconsistent with her consent to overnight access both immediately before and immediately after the period of breach: [46(d)] above.

56 The Father has therefore proved that the Mother breached the First Access Order on each of those 37 occasions.

57 Before moving on, I have the following advice for the Mother.

(a) A child's refusal to attend access triggers the care-parent's duty to act. It is not a licence to stop.

(b) What the duty requires depends on the circumstances. It will typically include speaking with the child to understand the reluctance, encouraging attendance, seeking professional help where the reluctance is serious, and proposing workable alternatives to the other parent.

(c) A care-parent who later relies on the child's refusal should be able to show what was done. Contemporaneous records, such as messages to the other parent, professional referrals and notes of what the child said, will usually be far more persuasive than a general assertion made months later.

Is the First Access Order still operative?

58 I come to the issue of whether the First Access Order is still operative, or whether it has been superseded by the Second Access Order. This issue must be decided because an order of make-up access (see below) is *additional* to the Father's *existing* access. The scope of make-up access thus depends on which access order is now operative.

The Father's submissions

59 The Father submits that the First Access Order continues to operate for the following reasons.¹⁶

(a) Nothing in the Second Access Order says that the First Access Order is set aside.

(b) Clause 4 of the Second Access Order provides for a limited number of Saturday and overnight weekend sessions, which have already been used up. The clause is transitional. It was intended to reintroduce overnight access and to operate alongside the First Access Order.

(c) If the First Access Order has ceased to operate, the Father is entitled only to one weekday dinner per week. That could not have been the parties' intention and is contrary to the Children's welfare.

(d) In any event, clause 4 of the Second Access Order provides that Saturday and overnight weekend access is subject to review, so the court can fix such access.

The Mother's submissions

60 The Mother submits that the Second Access Order supersedes the First Access Order.¹⁷

¹⁶ Father's submissions dated 18.08.26 at [8.1] to [8.10]; Father's submissions dated 01.09.26 at [3.4] to [3.11].

¹⁷ Mother's submissions dated 05.10.26 at [32] and [33].

My decision

61 I reject the Father's submission. The Second Access Order is a comprehensive regime that deals with custody, care and control, educational and health matters, all forms of access, exchange arrangements and religious observance. It was made after mediation, while the parties were in dispute over the First Access Order. Read as a whole, it was intended to replace the earlier arrangements, not to supplement them.

62 This conclusion is confirmed by the following incompatibilities between the two orders: see **Annex A2**.

(a) *Sundays*. Clause 7 of the Second Access Order requires the Mother to bring the Children to *mass on Sundays*. This contradicts cl 2 of the First Access Order which gives the Father right to alternate overnight weekend access from Friday 7 pm to Sunday 9 pm.

(b) *Thursdays*. The First Access Order provides for Thursday dinner access in alternate weeks. The Second Access Order *deliberately omits such dinner access*.

(c) *Tuesdays*. The First Access Order provides for *alternate-week* Tuesday dinners *without any condition*. On the other hand, the Second Access Order provides for *weekly* Tuesday dinner access, *subject to* the Children's tests and examinations. The two provisions are clearly framed on different bases.

63 The above finding is consistent with my decision in *YDQ v YDR* [2026] SGFC 71, dismissing the Father's attempt to withdraw his consent to the Second

Access Order. There, I held that the prevailing access arrangements were governed by that order.

64 I note the Father's concern about the Children's welfare: see [59(c)] above. The proper avenue to address this concern is through the review expressly provided for in cl 4 of the Second Access Order – not the revival of a superseded order. That operation of that review is unaffected by this decision.

Decision on the First and Second Applications

65 For the reasons given above –

(a) ECAO 17/2025 (concerning missed access on 25 and 28 June 2025) is *dismissed*.

(b) ECAO 15/2026 (concerning missed access from August 2025 to January 2026) is *allowed in respect of the 37 sessions*.

Enforcement measures

66 Having found that the Mother breached the First Access Order, I turn to the appropriate measures under s 126B(3).

The Father's submissions

67 In his applications, the Father requested that the Mother be ordered –

(a) to “strictly comply” with the First Access Order “forthwith”,¹⁸

¹⁸ Prayer 5 of the Second Application.

- (b) to provide make-up access,¹⁹
- (c) to execute a compliance bond (\$50,000/\$100,000),²⁰
- (d) to pay a fine (\$20,000/\$40,000) or to be imprisoned (four/eight weeks).²¹

68 In his submissions, the Father clarified that he is “primarily” seeking make-up access and a compliance bond. He has also clarified that a fine or imprisonment can be imposed “as a last resort, and to suspend any such sanction on condition of compliance”.²²

The Mother’s submissions

69 The Mother objects to the Father’s requests. She makes the following submissions.

- (a) *Make-up access should not be ordered. First*, access should be subject to the Children’s wishes. In this regard, they had told her on numerous occasions that they do not wish to meet the Father and that they feel uncomfortable around him.²³ *Second*, the daughter had made fresh allegations about inappropriate conduct by the Father against her for the period between January 2022 and April 2024. On 21 April 2026, the Mother filed a police report regarding such conduct. The matter had

¹⁹ Prayer 4 of the First Application; Prayer 6 of the Second Application; Father’s supporting affidavit for the Second Application dated 06.05.26 at [27] and [30(d)].

²⁰ Prayer 5 of the First Application; Prayer 7 of the Second Application.

²¹ Prayer 6 of the First Application; Prayer 8 of the Second Application.

²² Father’s submissions dated 18.08.26 at [1.6]; Father’s submissions dated 01.09.26 at [6.1].

²³ Mother’s affidavit dated 16.06.26 at [37] to [39].

also been referred to the Child Protective Services. (They had decided not to intervene at this stage.) In the circumstances, it is “wholly unsafe and contrary to the children’s best interests for unsupervised access to resume pending a full assessment and the outcome of police investigations. *Third*, a social service agency had referred the Father to a family services centre to work on safe and age-appropriate parenting approaches. The fact that there is such a referral justifies a higher level of scrutiny of his parenting conduct.²⁴

(b) *Compliance bond should not be imposed. First*, she did not prevent the children from meeting the Father. *Second*, the Children had expressed their wish not to meet him.²⁵

(c) *Fine and imprisonment should not be ordered.* The fine sought by the Father (\$40,000) exceeds the courts’ power (\$20,000). The “outrageous reliefs” sought by him demonstrates that he is unscrupulous and malicious.²⁶

My decision

Make-up access

70 Regarding the Father’s request for make-up access, I am of the view that an AER should be obtained to help the Court determine the arrangements needed to safeguard the Children’s welfare and support their relationship with the Father. Further, it is appropriate for me to defer make-up overnight weekend

²⁴ Mother’s affidavit dated 16.06.26 at [40] to [44].

²⁵ Mother’s affidavit dated 16.06.26 at [45] to [46].

²⁶ Mother’s affidavit dated 16.06.26 at [47] to [48].

access and any other enforcement measure (e.g., compliance bond) until the AER is available. Let me elaborate.

Why an AER is necessary

71 The evidence reveals difficulties in the relationship between the Father and the Children that go beyond the Mother's non-compliance. The Children have reportedly refused to see the Father for a prolonged period. The Mother attributes this to their distress over the 25 June 2025 incident and to concerns about the Father's past conduct. These matters raise important questions about the causes of the Children's reluctance, the parties' parenting dynamics, and the measures needed to restore meaningful access – especially weekend overnight access.

72 The issue of whether the Mother had breached the order is distinct from how the Children's relationship with the Father should now be restored. The first concerns past conduct and compliance with a legal obligation. The second calls for a forward-looking assessment of the Children's present circumstances, emotional needs and welfare. The evidence before me does not give a sufficiently complete picture for the second question. An AER would help with this. In deciding the Children's future access arrangements, the Court is entitled to independently obtain the relevant information on what is in their interests and welfare: see e.g., *WKM* at [60] to [74]; *AZB v AZC* [2016] SGHCF 1 at [21], [23] and [24].

73 I understand that the AER will involve interviews with both parents and the Children, observation sessions, and information from collateral sources, which may include significant family members, the Children's school and relevant professional agencies. The breadth of the assessment will give the

Court information from sources beyond the parties' competing accounts. The interviews may shed light on the Children's experiences, feelings and reasons for resisting access. The observations may illuminate the relationships within the family. Collateral information may help in understanding the Children's behaviour, their emotional well-being and the concerns each party has raised. Together, these should give a more informed and balanced picture of the family dynamics, the difficulties affecting access, and the alleged safety concerns.

74 To be clear, the AER is not intended to establish the truth of every allegation against the Father. The AER is to help the Court understand the Children's present needs and identify arrangements likely to promote safe, meaningful and sustainable contact with the Father. It may also help determine whether therapeutic intervention, a graduated restoration of access or other safeguards would be beneficial.

Why make-up dinner access should proceed pending the AER

75 The next question is whether make-up access should be deferred entirely until the AER is available.

76 In my view, it should not.

(a) I understand that the AER will take about eight weeks to prepare. The assessment is expected to begin in November 2026, likely after the Children's examinations, with the report available by the end of December 2026.

(b) If all make-up access were deferred until the end of December, the Father would lose further time with the Children, on top of an already

prolonged disruption. Where a parent-child relationship is strained, further separation may deepen the distance and make rebuilding harder.

(c) Two considerations must be balanced. Access should not be restored in a way that disregards the Children's emotional well-being or exposes them to unjustified risk. However, deferring all contact until every concern has been assessed may unnecessarily prolong their separation from the Father. The Children's welfare requires the Court to weigh the risks of both premature intervention and prolonged inaction.

77 Further, I am of the view that make-up dinner access, with safeguards (such as the access should not interfere unnecessarily with the Children's examinations), strikes a reasonable balance.

(a) Such sessions are short and well defined. The Children return to the Mother's care the same day, and the arrangements can be structured to minimise disruption to their routines. The Second Access Order itself contemplates dinner access.

(b) The AER assessment and make-up dinner access need not be mutually exclusive. In fact, appropriately managed contact during the assessment period may give the assessors relevant information about the Children's responses and the parties' interactions, if they consider it useful. That remains a matter for their professional judgment.

Why make-up overnight weekend access should be deferred

78 I take a different view of make-up *overnight weekend* access.

(a) Overnight access involves the Children staying in the Father's care for much longer. Given the prolonged disruption, the Children's

reported reluctance, and the allegations about the Father's past conduct, a more informed assessment is needed before deciding whether additional overnight stays should be ordered and on what terms.

(b) The AER can help the Court understand whether the Children's reluctance is serious or persistent enough to affect their ability to cope with overnight stays; whether there are material safety or emotional concerns requiring safeguards; and whether overnight contact should resume immediately, progressively, or with professional support.

79 I emphasise two points.

(a) Deferring make-up overnight access is not a finding that the Father poses a danger to the Children, or that the Mother's allegations are established. It reflects the difference between the evidence sufficient to justify dinner access with safeguards, and the further information that would help the Court decide whether longer, overnight stays are presently appropriate.

(b) Nor is the deferral an indefinite suspension. The AER is expected by the end of December 2026, and a decision on make-up overnight access will be made soon after that.

Considerations for the make-up dinner access

80 I turn to the arrangements for make-up dinner access.

81 Under clause 3 of the First Access Order, each dinner session lasted 1½ hours, from 6.30 pm to 8.00 pm on Tuesdays and Thursdays in weeks when the Father did not have overnight weekend access.

82 One possible arrangement is to combine two missed dinner sessions into one three-hour Saturday session, from 3.00 pm to 6.00 pm. Two questions arise. *First*, is this legally permissible under s 126B(3)(a)? *Second*, is it appropriate having regard to the Children's welfare?

Is the proposed arrangement legally permissible?

83 In my view, the proposed arrangement is legally permissible.

(a) There are two provisions relevant to the issue. Section 126B(3)(a) empowers the Court to order additional access to make up for access denied through a breach. Section 126B(4) provides that such an order must not give the access-parent more access than he or she was entitled to under the original order.

(b) On a plain reading of the two provisions, the Court has some flexibility in the timing and organisation of make-up access, provided it does not confer more than the access lost.

(i) Section 126B(3)(a) does not require make-up access to take place on the same weekday, at the same time, or in exactly the same number of sessions as the access denied. Such a rigid requirement would substantially limit the remedy's practical value, particularly where the original circumstances for the arrangements have since changed.

(ii) Regarding s 126B(4), I note that access has both quantitative and qualitative dimensions. A make-up order should not confer a materially more extensive form of access than the original entitlement merely because the total hours can be

equated. The nature, duration and practical effect of the proposed access must also be considered.

(c) Combining two 1½-hour dinner sessions into one three-hour Saturday afternoon session does not increase the total duration of access. The difference between one continuous period and two shorter sessions on separate days does not, by itself, take the order outside s 126B(3)(a) read with s 126B(4).

Is the proposed arrangement appropriate?

84 The next question is whether I should exercise my discretion to order the proposed arrangement.

85 In my judgment, there are substantial practical advantages to doing so.

(a) A three-hour Saturday session may give the Father and the Children a better opportunity for meaningful time together than a 1½-hour weekday dinner, much of which may be taken up by travel, eating and exchanges. A Saturday afternoon allows more relaxed activity, conversation and gradual rebuilding of the relationship.

(b) Combining two sessions into one halves the number of exchanges. Fewer exchanges mean fewer occasions for confrontation.

(c) Clause 7 of the Second Access Order requires the Father to ensure that the Children attend catechism classes on Saturdays from 1.30 pm to 3.00 pm. Starting the make-up access at 3.00 pm would coincide with the end of those classes. Since the Children are already with the Father for the classes, this may also reduce travel and handover issues.

(d) Starting the Saturday sessions from the year-end school holidays is appropriate. *One*, it avoids disrupting the Children's preparations for their examinations. *Two*, it allows for a graduated arrangement – beginning first with make-up Thursday dinner access in October. This better accommodates the uncertainty about the Children's present readiness.

86 The above advantages must be weighed against one possible disadvantage. Two shorter sessions may be less demanding for the Children than one continuous three-hour session, and may give more frequent contact, which can help restore a strained relationship.

87 Balancing these considerations, I consider that consolidating missed dinner access into Saturday afternoon sessions is an appropriate way to restore some of the Father's lost contact.

Conclusion

88 In ordering make-up access, the Court must take a proportionate and practical approach consistent with the Children's welfare. The immediate objective is to preserve opportunities for the Father and the Children to maintain and rebuild their relationship without exposing the Children to unnecessary distress. The longer-term objective is to establish access arrangements informed by a proper understanding of the Children's needs and the family's circumstances.

89 I therefore order make-up dinner access pending the AER on the terms in **Annex C**.

90 I reserve a decision on make-up overnight weekend access and other enforcement measures until the AER is available.

Kow Keng Siong
District Judge

The Father in person;
A Rajandran (M/s A Rajandran) for the Mother.

ANNEX A1

FIRST ACCESS ORDER – MADE ON 20 JUNE 2025

By Consent – [Father’s] Interim Unsupervised Access to the Children

1. From Monday, 23rd June 2025 to Wednesday, 25th June 2025 and Saturday, 28th June 2025 from 12 noon to 6 pm. He is to fetch and return the children to McDonalds located in Nex Mall.
2. He shall have alternate overnight weekend access commencing on Friday, 4th July 2025 from 7 pm to Sunday night at 9 pm. He is to fetch and return the children to McDonalds located in Nex Mall.
3. On the week when the [Father] does not have overnight access, he shall have dinner access on Tuesday and Thursday from 6.30 pm to 8 pm. He is to fetch and return the children to McDonalds located in Nex Mall.

[text in square brackets added]

SECOND ACCESS ORDER – MADE ON 2 FEBRUARY 2026

Orders Made (By Consent):

- 1 Parties shall have joint custody of the two children of the marriage ... with care and control to the [Mother].
- 2 With regards to the educational and health matters, save for emergencies, the [Mother] is to inform the [Father] and the [Father] is to respond with 7 days.
- ...
- 4 The [Father] shall have 4 sessions of access, commencing on 14 February 2026 on Saturdays, from 10 am to 8 pm, and 4 sessions of overnight access from 6 pm, Fridays to 8 pm, Saturdays. The exchange shall be supervised at the [XXX]. There shall be a Review of access by the Court on a date to be fixed.
- 5 The [Father] shall have weekday dinner access on Tuesdays, from 6.30 pm to 8 pm, subject to the children not having school tests or exams.
- 6 Parties shall undertake to ensure that each of them shall maintain peace and shall conduct themselves to allow access to proceed smoothly.
- 7 The [Father] shall ensure that he sends the children for their catechism classes (1.30 pm to 3 pm on Saturdays at ...). The [Mother] shall bring the children for *mass* on Sundays, and neither the [Father], nor the [Mother] shall ask the children about their weekend activities with the other parent or catechism or mass.

...

[text in square brackets added]

ANNEX A2

**COMPARISON
FIRST AND SECOND ACCESS ORDERS**

Terms		First Access Order	Second Access Order
Access Terms			
1	Access sessions within specified period	Yes – Clause 1 Limited to four sessions (unsupervised)	Yes – Clause 4 Limited to four sessions (supervised)
2	Overnight weekend access	Yes – Clause 2 Alternate week (unlimited)	Yes – Clause 4 Limited to four sessions within a specified period – Subject to review
3	Weekday dinner access (Tuesday)	Yes – Clause 3 Limited to the week where there is no overnight weekend access	Yes – Clause 5 Weekly
4	Weekday dinner access (Thursday)	Yes – Clause 3 Limited to the week where there is no overnight weekend access	
Other Terms			
5	Joint custody		Yes – Clause 1
6	Care and control		Yes – Clause 1
7	Educational and health matters		Yes – Clause 2
8	Arrangements for children's attendance at catechism classes and masses		Yes – Clause 7

ANNEX A3**SCHEDULE OF MISSED ACCESS²⁷**

Type of access		Alleged breaches
(a)	Scheduled access	25.06.25 and 28.06.25 (2 sessions)
(b)	Weekend access (Alternate week)	15.08.25 to 30.01.26 (13 sessions)
(c)	Dinner access (Tuesdays)	19.08.25 to 20.01.26 (12 sessions)
(d)	Dinner access (Thursdays)	21.08.25 to 22.01.26 (12 sessions)

²⁷ Father's affidavit dated 07.08.25 at [19]; Father's affidavit dated 06.05.26 at pages 9 to 13. The dates of the Relevant Occasions were also confirmed by the Father during oral submissions.

In the Second Application, the period of the alleged breaches extended to April 2026 – i.e., after 1 February. In his affidavit dated 19.06.26 at [7] to [9], the Father had (rightly) confined the scope of his application to the period when the First Access Order was subsisting.

The table excludes three dates which the Father alleges that breach had occurred. The first is 04.08.25 (Monday). This is incorrect as the order does not provide for access on Mondays. The other two dates are for dinner access on 15.07.25 (Tuesday) and 17.07.25 (Thursday). This is again incorrect as these two days fell in the week where he was supposed to have overnight weekend access. (According to clause 2 of the First Access Order, the alternate weekend access began on 04.07.25.)

ANNEX B**PROCEDURAL HISTORY**

(Information regarding the relevant access orders and applications is in grey.)

Date	Events
07.01.25	Interim judgement for divorce granted.
20.06.25	After mediation, the terms of the First Access Order were agreed and recorded by a district judge.
25.06.25	First occasion of non-access. The scheduled access did not proceed smoothly.
27.06.25	The Father's lawyer asked the Mother's lawyers for consent to extract the First Access Order.
27.06.25	Ms Kasturibai, one of the Mother's lawyers, confirmed that the draft First Access Order was "good to be approved".
28.06.25	Mr Rajandran, the Mother's other lawyer, asked that the order not be extracted while he took instructions.
28.06.25	Second occasion of non-access. The Mother did not bring the children to the access venue.
28.07.25	First Access Order extracted despite the Mother's objections.
31.07.25	First Access Order served on the Mother.
07.08.25	First Application filed , for alleged breaches on 25 and 28 June 2025.
27.11.25	Mother applied to set aside the First Access Order.
02.02.26	Second Access Order made after mediation. Its terms are set out in <u>Annex A1</u> .
24.02.26	Second Access Order extracted.
24.02.26	The Father applied to withdraw his consent to the Second Access Order: SUM 469.
06.05.26	Second Application filed , for alleged breaches of First Access Order on multiple occasions from August 2025 to 6 May 2026.
18.05.26	SUM 469 dismissed. The Second Access Order was held to be valid and enforceable, and to govern the prevailing access arrangements: <i>YDQ v YDR</i> [2026] SGFC 71.

ANNEX C

MAKE-UP DINNER ACCESS

BY ORDER –

- 1 The Father shall have make-up access discharging the 24 missed Tuesday and Thursday dinner-access sessions under the First Access Order, by way of the sessions in cl 2.
- 2 The make-up sessions shall be as follows.
 - (a) 12 sessions of dinner access on Thursdays (6.30 pm to 8.00 pm), from 15 October 2026 to 31 December 2026. No session shall take place on the eve of the Children’s school tests or examinations.
 - (b) 6 sessions of access on Saturdays (3.00 pm to 6.00 pm), from 21 November 2026 to 26 December 2026.
- 3 The exchange venue shall be as follows.
 - (a) Dinner access on Thursdays: McDonalds outlet at Nex Mall.
 - (b) Access on Saturdays: The handover venue will be at the relevant Church if there are catechism classes. If there are no such classes, the handover venue will be at the McDonalds outlet at Nex Mall.
- 4 For clarity –
 - (a) Each Thursday make-up session discharges one missed dinner-access session under the First Access Order.
 - (b) Each Saturday make-up session discharges two missed dinner-access sessions under the First Access Order.
 - (c) The make-up sessions are additional to the Father’s access under the Second Access Order.
 - (e) There shall be no replacement for a make-up session missed or only partly used by the Father.