

IN THE FAMILY JUSTICE COURTS OF THE REPUBLIC OF SINGAPORE

[2026] SGFC 96

Maintenance No 2624/2025

Between

YFR

... Applicant

And

YFS

... Respondent

GROUND OF DECISION

[Child Maintenance - Women's Charter s.69]

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YFR

v

YFS

[2026] SGFC 96

Family Court — Maintenance No 2624 of 2025
District Judge Goh Zhuo Neng
24 April 2026

21 July 2026

District Judge Goh Zhuo Neng:

1. This grounds of decision concerns an application by the Complainant Mother (“**Mother**”) against the Respondent Father (“**Father**”) that he pay her interim maintenance for herself and the child of the marriage who was aged 10 this year (the “**Child**”), pending the resolution of the divorce proceedings this year.
2. I heard parties on 24 April 2026. On 4 May 2026, the Father filed his notice of appeal against my decision. The full grounds of my decision are set out below.

A. Background

3. The parties were married on 10 April 2010. The Mother and Child currently live together in the matrimonial home (“**Home**”). The Father lives with his younger sister.
4. The Mother filed the present application on 28 November 2025 seeking \$1,200 in monthly maintenance for herself (\$400) and the Child (\$800). At the hearing, she confirmed that she was just seeking maintenance for the Child.

B. The Law

5. Under section 69(4) of the Women’s Charter, which is applicable to the determination of child maintenance and apply by way of section 127(1) of the Women’s Charter, the Court when ordering maintenance for a wife or child shall have regard to all the circumstances of the case including the following matters:
 - (a) the financial needs of the wife or child;
 - (b) the income, earning capacity (if any), property and other financial resources of the wife or child;
 - (c) any physical or mental disability of the wife or child;
 - (d) the age of each party to the marriage and the duration of the marriage;

(e) the contributions made by each of the parties to the marriage to the welfare of the family, including any contribution made by looking after the home or caring for the family;

(f) the standard of living enjoyed by the wife or child before the husband or parent, as the case may be, neglected or refused to provide reasonable maintenance for the wife or child;

(g) in the case of a child, the manner in which he was being, and in which the parties to the marriage expected him to be, educated or trained; and

(h) the conduct of each of the parties to the marriage, if the conduct is such that it would in the opinion of the court be inequitable to disregard it.

6. In *Foo Ah Yan v Chiam Heng Chow* [2012] 2 SLR 506 (“*Foo Ah Yan*”), the Court of Appeal observed at [22]:

“22 Furthermore, the duty of a husband to maintain his wife during the marriage, as provided by s69(1) of the Act, and the obligation to provide maintenance to a former wife under s113 of the Act are driven by separate forces. As Prof Leong Wai Kum pointed out in *Elements of Family Law in Singapore* ([15] *supra*) at p476:

‘In the former situation, the objective is to provide modest maintenance, namely to help her overcome her immediate financial need which may well be the same objective when ordering maintenance for a dependent child. In the latter situation, maintenance ordered for a former wife,

however, serves the far more ambitious objective of giving her a fair share of the surplus wealth that had been acquired by the spouse during the subsistence of the marriage...'

7. In *VRJ v VRK* [2021] SGHCF 9, the High Court also stated that where a spouse has access to a considerable amount of money which would more than satisfy the immediate financial needs of herself and her children, she cannot rely on her own refusal to use that money to show that the other spouse had neglected or refused to provide reasonable maintenance [at 20].
8. The Court's approach to determining issues of maintenance has shifted in favour of ordering a fixed maintenance sum. In *WBU v WBT* [2023] SGHCF 3, [9 to 12] the Court provided an explanation on how maintenance for a child should align more with a "budget" approach using a fixed maintenance sum.
 - (a) Maintenance is ordered to provide for the reasonable needs of the child, having regard to all the relevant circumstances of the case.
 - (b) The mere fact that the parties have been paying for certain items during the marriage does not automatically render the expenses "reasonable". Parties must be able to show that the projected expenditure is reasonable having regard to the child's standard of living and the parents' financial means and resources.

- (c) When quantifying these reasonable expenses, parties should avoid an overly mathematical approach where receipts are adduced to prove every single item of expenditure. Whether a receipt is required depends on the facts of the case and the production of a receipt is not conclusive of what the child's reasonable expenses are.
 - (d) It may be helpful for parties to draw up a "budget" where broad categories of the child's estimated needs are identified, with a corresponding reasonable sum proposed for each category.
 - (e) This budget framework provides a baseline financial framework for the parties in respect of the child's expenses, and the Court will not be overly prescriptive on how these budgeted monies are specifically applied.
9. In *CWR v CXQ* [2023] SGHCF 10, at [118], the High Court stated that individual items of expenses set out by the Court in its assessment of a child's reasonable monthly expenses were a gauge. It was not practically possible for the child to spend exactly the same amount per month, every single month. The monthly sum of reasonable expenses reached was a fair way to provide a sort of "budget" for the maintenance of the child, and parties ought to manage their finances in a flexible and sensible way.

C. Apportionment of Expenses

10. First, I address the parties' ability to pay for the Child's expenses which will help me determine the reasonableness of these expenses as well as how these expenses will be apportioned between the parties.

11. I set out below a comparison of the parties' Notices of Assessment for the Years of Assessment 2023 to 2025.

Year of Assessment (Year)	Father	Mother
2023 (2022)	\$33,161	\$45,727
2024 (2023)	\$34,963	\$44,742
2025 (2024)	\$34,931	\$44,456

12. Given the lack of fluctuation in their income levels over the years, I decided to accord them an income capacity in accordance with the annual income they reported in the Year of Assessment 2025.

	Father	Mother
Income Capacity	\$34,931	\$44,456
% share of the Children's Expenses	42%	58%

Reasonableness of Expenses

13. In considering the reasonableness of expenses, I took into consideration the following.

- (a) The Father's claim that he did not have sufficient funds to pay maintenance for the Child. Here, he claimed that he spent \$3,209.84 a month on his expenses. This included the following sums, which were not justified in my opinion:

Expenses	Claimed	Allowed	Remarks
Rent	\$1,000	\$0	No tenancy agreement provided and he was living with his sister. This was likely to be an invented expense.
Food	\$400	\$700	This is a reasonable sum for an adult.
Groceries	\$200		
Dining Out	\$250		
Concession Passes	\$80	\$80	
Medical	\$150	\$50	No proof provided of recurring expenses amounting to \$160 a month.
Dental	\$10		

Personal Insurance	\$339.84	\$100	No justification for such a high level of insurance and copies of the policies and actual payouts were not provided.
Clothing	\$100	\$85	A budget of \$1,000 a year would suffice
Shoes	\$50		
Personal Grooming	\$30	\$30	
Toiletries	\$150	\$30	This was a very high monthly sum for toiletries such as body wash, shampoo, facial wash.
Mobile Phone	\$90	\$50	This could be reduced significantly.
Allowance for Parents	\$200	\$0	This was not a necessary expense taking into account the Father's obligations to maintain the Child.
Hobbies	\$50	\$50	

Sports	\$50	\$50	
Spectacles	\$60	\$60	
Total	\$\$3,209.84	\$\$1285.00	

14. I also understood that with the Father moving out, there was a spare room in the Home which could be rented out. While there was limited evidence on the amount which could be obtained from monthly rental, it could certainly have helped to defray the expenses of the Child. The Father had objected to renting the spare room out on the basis that the divorce might take a while and cited the uncertainty of who would ultimately receive the Home in the divorce, or if it would be sold. I took the view that this was a self-imposed deprivation of a potential revenue source. Such a situation was not unique, and the Child's interests should be prioritized over this perceived inconvenience.

15. I set out below my treatment of the Mother's position on the Child's expenses. In accordance with the budget approach, I also allocate what I feel is a sufficient budget to address the tuition, education, medical and dental expenses of the Child.

Expense	Seeking	Granted	Remarks
Food Groceries	\$250	\$250	
Clothing	\$100	\$100	
Medical	\$70	\$70	
Insurance	\$0	\$50	Health and accident only

School Expenses (Books Stationery)	\$100	\$100	
Transport	\$100	\$100	
Pocket Money	\$60	60	
School Fees	\$13	\$13	
Childcare	\$440	\$440	
Enrichment Tuition	\$450	\$450	
Entertainment	\$120	\$50	Reduced to \$150 a month for these items as the maintenance granted at this stage is meant to be on a modest level.
Hobbies and Sports	\$181	\$50	
Tours and family outings	\$200	\$50	
Total	\$\$2084.00	\$\$1783.00	

Amount Payable by the Father

16. I set out below the amount payable by the Father for the Child based on his 42% share.

Child	Expenses	42% Share of Expenses	Round to
Child	\$1,733	\$727.86	\$730

17. I did not think this would be difficult for the Father to bear. When the sum of \$730 is added to the Father's reasonable expenses of \$1,285 I have identified above, the total of \$2,015 is less than his take home pay of \$2,144 a month. I therefore order him to pay the Mother the sum of \$730 a month as maintenance for the Child with effect from the 15th of May 2026 and thereafter on the 15th day of each month, by way of Paynow to the Mother's designated phone number (XXXX1669).
18. To incentivize the Father to rent out the spare room in the Home, I order that if the Mother is renting the Home, she must notify the Father and half of the rental received by her may be used and set off against the maintenance payable by the Father.

Backdating

19. The Mother has asked that any new figure for maintenance be backdated to the date of her application.
20. In determining issues of backdating, one has to consider the ability of the payor of maintenance to repay the backdated maintenance and the ability of the care and control parent to bear the loan of the unpaid maintenance.
21. I take the view that the Father will not be liable for 5 months of backdated maintenance as the Father did not appear to have the means to repay it. The amount payable monthly would consume the bulk of his disposable income, and he required a reasonable buffer for his expenses.

D. Conclusion and Costs

22. For the reasons above, I made the above orders.

Goh Zhuo Neng
District Judge

*Applicant-in-Person; and
Respondent-in-Person*
