

Family Law in Singapore: Overview

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A Q&A guide to family law in Singapore.

The Q&A gives a high-level overview of key issues including jurisdiction and conflict of law; pre- and post-nuptial agreements and matrimonial property regimes; divorce, nullity, and judicial separation; children; surrogacy and adoption; cohabitation; family dispute resolution; civil partnership/same-sex marriage; and controversial areas and reform.

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Jurisdiction and Conflict of Law

Regulatory Framework

1. What are the primary sources of law in relation to marriage, marital breakdown and the welfare of children and give a brief overview of which courts will have jurisdiction to hear the dispute?

Sources of Law

The Singapore legal system is rooted in the English common law model. The two primary sources of law in relation to marriage, marital breakdown and the welfare of children are:

- Legislative enactments (statutes).
- The common law as applied in Singapore.

The *Women's Charter 1961* (Women's Charter) is the main source of substantive statutory law concerning family law and the formation and breakdown of non-Muslim marriages in Singapore.

Islamic divorce law in Singapore is codified in the *Administration of Muslim Law Act 1966* (AMLA). Family proceedings for Muslims are heard before the Syariah Court.

Other statutes governing the welfare of children in Singapore are:

- The Guardianship of Infants Act 1934.
- The Children & Young Persons Act 1993.
- The International Child Abduction Act 2010.

The Family Justice Act 2014 (FJA) introduced substantial structural changes to the family justice system and established the Family Justice Courts (FJC) that hear all non-Muslim family law matters (see below, *Court system*).

Procedures in the FJC are currently regulated by the Family Justice Rules 2014 (FJR). These rules aim to reduce acrimony in family proceedings, as well as simplify and expedite family law proceedings. These rules adopting a judge-led pro-active, inquisitorial and problem-solving approach in appropriate cases.

Court System

The FJC consist of the:

- Family Courts.
- Youth Courts.
- Family Division of the High Court.

These courts handle all family-related proceedings including:

- Divorce.
- Children and parental rights.
- Financial disputes.
- Family violence.
- Juveniles and youths.
- Adoption and guardianship.
- Probate.
- Succession.
- Mental capacity.

The Family and Youth Courts are courts of first instance. The Family Division of the High Court exercises both original and appellate jurisdiction. Appeals to the Appellate Division of the High Court are available as of right for first instance decisions of the Family Division of the High Court. Leave to appeal is generally required in all other cases. Any further appeals beyond the Appellate Division of the High Court to the Court of Appeal (the highest court) require permission.

Jurisdiction

2. What are the main requirements for local courts to have jurisdiction in relation to divorce, property and children proceedings?

Divorce

Singapore courts have jurisdiction to hear divorces, judicial separation and nullity of marriage proceedings if, at the start of proceedings, either of the parties:

- Is domiciled in Singapore.
- Has been habitually resident in Singapore for at least three years.

(Section 93(1), Women's Charter.)

However, for nullity proceedings on the ground that a marriage is void or voidable, the court can grant relief when both parties reside in Singapore at the time proceedings commence.

No divorce can be filed unless the parties have been married for at least three years at the date of filing (section 94(1), Women's Charter). There are limited exceptions based on proof of exceptional hardship suffered by the claimant or exceptional depravity on the part of the defendant.

Same-Sex Spouses and Civil Partners

There is currently no legal recognition of same-sex unions or civil partnerships (see [Question 36](#)).

Property

Proceedings for the division of matrimonial property are ancillary to the granting of a judgment for divorce, judicial separation or nullity.

During the marriage, spouses can initiate proceedings under ordinary property law principles of common law and equity.

Where a divorce has already been granted overseas, Singapore courts have jurisdiction to hear applications for financial relief under Chapter 4A of the Women's Charter provided that permission of the court is obtained (section 121B and 121D, Women's Charter).

For such relief to be granted, one of the parties to the marriage must be either:

- Domiciled in Singapore on the date of the application for permission or on the date the overseas divorce took effect in the foreign country.
- Habitually resident in Singapore for at least one year before:
 - the date of the application for permission; or
 - the date the overseas divorce took effect in the foreign country

(Section 121C, Women's Charter.)

Before making an order for financial relief, the court is required to consider whether the such an order is appropriate in the circumstances of the case (section 121F, Women's Charter).

Children

The statutory jurisdictional criteria for dissolution of marriage do not bar proceedings relating purely to children of married or unmarried couples. Parties residing in Singapore can file such proceedings under the Guardianship of Infants Act 1934. However, the court can decline to exercise jurisdiction on the principles of *forum non conveniens* or restrictions under the *HCCCH Convention on the Civil Aspects of International Child Abduction 1980* (Hague Child Abduction Convention).

Parents with at least one child below the age of 21 who intend to seek a divorce must attend a mandatory parenting programme before filing the writ or their counterclaim (section 94A, Women's Charter).

Domicile, Nationality and Habitual Residence

3. How do the concepts of domicile, nationality and habitual residence apply in relation to divorce, financial arrangements, and children?

Domicile

The Singapore courts have defined domicile as being determined by the "intention of the person's choice, not of the place where he chooses to live, but the place where he chooses to die" (*TQ v TR [2007] 3 SLR(R) 719 (TQ v TR)*).

A Singapore citizen is presumed to be domiciled in Singapore until the contrary is proven (section 3(5), Women's Charter).

Domicile is a question of fact. Singapore law recognises three types of domicile:

- Domicile of origin, which is the domicile given to an individual by law or at birth.
- Domicile of dependency, which is attributed to a child whose domicile follows their father before attaining the age of majority.

- Domicile of choice, which is proved by residence in Singapore and an intention to remain permanently or indefinitely (*Peters Roger May v Pinder Lillian Gek Lian* [2009] 3 SLR(R) 765).
- The standard of proof to displace the domicile of origin in favour of a domicile of choice is beyond that of a mere balance of probabilities (*VGC v VGD* [2020] SGFC 20).

Habitual Residence

To establish habitual residence under the Women's Charter, the residence must be both:

- Voluntarily adopted.
- For a settled purpose.

There must be a requisite continuity of habitual residence throughout the relevant period (*Lee Mei-Chih v Chang Kuo Yuan* [2012] 4 SLR 1115; *WJK v WJL* [2022] SGFC 85).

The court has jurisdiction to hear proceedings for divorce, presumption of death and divorce, judicial separation or nullity of marriage only if either of the parties to the marriage is habitually resident in Singapore for at least three years immediately preceding the commencement of the proceedings (section 93(1)(b), Women's Charter).

Conflict of Law

4. What procedure applies for a party applying to stay proceedings in favour of a foreign jurisdiction? What factors do local courts take into account when determining forum issues?

Procedure

To stay proceedings in favour of a foreign jurisdiction, a party must apply to court to dispute the jurisdiction or seek a stay in favour of foreign proceedings before the time for filing a defence to a Singapore action expires.

Factors

The principles relevant to staying proceedings in favour of a foreign jurisdiction are the forum considerations generally set out in the English decision of *Spiliada Maritime Corporation v Cansulex Ltd* [1987] AC 460.

In *VH v VI* [2008] 1 SLR(R) 742, the High Court affirmed the applicability of *Spiliada* in the Singapore matrimonial context as follows:

- A stay will only be granted where the court is satisfied that there is some other available forum that has jurisdiction and is the appropriate forum.
- The burden of proof is on the defendant to persuade the court to grant a stay by showing that Singapore is not the natural or appropriate forum and that there is another available forum which is clearly or distinctly more appropriate.
- If the court is satisfied that there is another available forum which is prima facie the appropriate forum for the action, the burden shifts to the claimant to show special circumstances for the proceedings to take place in Singapore.
- The "natural forum" is the one with the most real and substantial connection to the dispute. This can be shown with reference to factors like convenience or expense (such as the availability of witnesses) of trial in a given forum and other factors such as enforceability (location of parties, location of assets and so on).
- If the court concludes that there is no other available forum that is clearly more appropriate, it will ordinarily refuse a stay.

In *BDA v BDB* [2013] 1 SLR 607, the High Court held that nationality by itself was of limited significance, while residency and/or domicile were better indicators of a party's connection to a particular forum (affirmed in *Sanjeev Sharma v Surbhi Ahuja* [2015] 3 SLR 1056).

In *TDX v TDY* [2015] 4 SLR 982, the court emphasised that in disputes over the proper forum for cases concerning children, the key question was: which forum would more effectively assess what would be in the best interests of the child?

In a recent case, the High Court dismissed the wife's appeal against a decision to stay the Singapore action in favour of proceedings in Japan on the basis that the proceedings would be best conducted in the environment of the parties' home and culture (*VXK v VXL* [2022] SGHCF 4). The judge found that the parties had no intention to reside in Singapore on a long-term basis, and that the factors connecting the parties to Japan were strong.

Anti-Suit Injunctions

An anti-suit injunction (ASI) in the Singapore courts can be sought before any order has been successfully granted in the foreign jurisdiction.

The High Court in *VH v VI* [2008] 1 SLR(R) 742 affirmed the applicability of the principles in *Société Nationale Industrielle Aerospatiale v Lee Kui Jak* [1987] AC 871 to family proceedings in determining whether an anti-suit injunction should be granted. These principles are:

- The jurisdiction to make such an injunction will be exercised only when the "ends of justice" require it.
- If a court grants an injunction restraining proceedings in a foreign court, that order is directed not against the foreign court but against the parties so proceeding or threatening to proceed.
- An injunction will only be issued restraining a party who is amenable to the jurisdiction of the court, against whom an injunction will be an effective remedy.
- The jurisdiction is one which is exercised with caution since such an order indirectly affects the foreign court.

The court will also consider whether Singapore is the natural forum for resolution of the dispute and whether the foreign proceedings have been started in breach of any agreement between the parties (*AQN v AQO* [2015] SLR 523).

A Singapore court should be slow to grant an ASI against proceedings for financial relief consequent on a foreign divorce (under Part III of the UK Matrimonial and Family Proceedings Act 1984 (MFPA)) because:

- The grant of an ASI in such circumstances would suggest that the commencement of UK Part III proceedings following a Singapore divorce would always be vexatious and oppressive and would render UK Part III proceedings ineffectual for parties who divorce in Singapore.
- To decide that Part III proceedings would be always vexatious and oppressive would sit uncomfortably with Chapter 4A of the Women's Charter (providing for relief to be granted in Singapore following a foreign divorce) which was modelled after Part III of the Act.
- Both Part III of the MFPA and the Chapter 4A of the Women's Charter contain a leave mechanism to sift out unmeritorious applications. The Court of Appeal concluded that an ASI can still be granted where the commencement of UK Part III proceedings could lead to unwarranted interference with Singapore's judgments and court processes.

(*VEW v VEV [2022] 2 SLR 380.*)

Applicable Law

5. Are foreign nationals treated differently on divorce?

Assuming the requirements of jurisdiction are met, foreign nationals can file for a divorce in Singapore.

There are no legal principles which subject foreign nationals to different treatment on divorce in Singapore.

However, foreign nationals should consider the differences between their domestic divorce laws and that of Singapore, for example:

- Singapore asset division law has no presumption of an even split of assets in divorce.
- Prenuptial agreements relating to the division of matrimonial assets entered under foreign law are not automatically enforceable and are considered to be just one factor in the asset division process. Such agreements may be accorded little or no weight in some cases while having significant or even critical weight in others (see [Question 7 to 9](#)).

Service of Proceedings

6. What are the requirements for service of divorce, financial and children proceedings in your jurisdiction?

Service of originating processes and documents in family proceedings can be effected personally or by registered post (rule 48(1), FJR).

Documents can be also served personally or by registered post out of the jurisdiction without leave of court (rule 49(1), FJR).

Two reasonable attempts at personal service should typically be made before an application for substituted service can be filed. The applicant must demonstrate that the proposed mode of substituted service will bring the document in question to the notice of the person being served (paragraph 79, FJC Practice Directions).

An application for substituted service can be made on an ex parte basis, provided this is supported by an affidavit, which should include:

- The dates, times and outcomes of attempts at personal service and why the applicant believes that such attempts made were reasonable.
- Evidence and grounds for the applicant's belief that the defendant is currently residing at the proposed address for substituted service (rule 50, FJR).

Pre- and Post-nuptial Agreements and Matrimonial Property Regimes

Validity of Pre- and Post-Nuptial Agreements

7. To what extent are pre-nuptial and post-nuptial agreements binding?

Singapore law does not treat pre-nuptial and post-nuptial agreements as automatically enforceable. Spouses can challenge such agreements as they are subject to the scrutiny of the court to determine whether and to what extent they are enforceable. The most significant decision on these agreements is the Court of Appeal decision in *TQ v TR* [2009] 2 SLR(R) 961.

The Singapore courts have long held that pre-nuptial agreements enabling spouses to negate a marriage and its legal obligations are against public policy and are unenforceable. However, agreements that regulate marital relations (for example, dictating how the couple should live and conduct themselves as spouses in line with Chinese customary practices) have long been held to be valid (*Kwong Sin Hwa v Lau Lee Yen* [1993] 1 SLR(R) 90).

The courts have jurisdiction to review and vary agreements relating to maintenance and custody (sections 116, 119 and 129, Women's Charter). When exercising powers to divide marital assets, the court must also statutorily have regard to any agreement

between the parties regarding the ownership and division of matrimonial assets made in contemplation of a divorce (section 112(2)(e), Women's Charter).

The Court of Appeal has held that if an agreement is entered into for the purpose of dividing assets in the context of a specifically contemplated divorce, and if the divorce does not take place because of reconciliation, the agreement will have no relevance during a later divorce (*Lian Hwee Choo Phebe v Tan Seng Ong* [2013] 3 SLR 1162).

Where a pre-nuptial agreement relates to the maintenance of a wife and children, *TQ v TR* provides that the courts cannot be barred from reviewing such an agreement. The courts are especially vigilant and reluctant to enforce agreements that are not in the best interests of children. There is a presumption that pre- and post-nuptial agreements relating to the welfare of the children are unenforceable unless the party relying on the agreement proves that it is in the best interests of the children concerned (*AUA v ATZ* [2016] 4 SLR 674).

A pre- or post-nuptial agreement is just one of the factors considered by the court in exercising its power to divide the matrimonial assets. A valid agreement will, if considered relevant, be reflected in an order of the court. Such an agreement cannot exclude the jurisdiction of the court (*AOO v AON* [2011] 4 SLR 1169).

A separation agreement, especially one concluded after divorce or separation proceedings have already commenced, will generally carry significant weight (*Surindar Singh s/o Jaswant Singh Jaswant Singh v Sita Jaswant Kaur* [2014] 3 SLR 1284).

In *AUA v ATZ*, the terms of a post-nuptial agreement for the division of assets were upheld, however, the terms relating to child maintenance were considered to be inadequate.

Pre-nuptial agreements entered into by foreign nationals are, in principle, accorded significant weight in Singapore's ancillary proceedings (see [Question 9](#)).

8. Do matrimonial regimes exist in your jurisdiction and is there a default matrimonial property regime?

Default Regime

No matrimonial regimes exist in Singapore. The division of matrimonial assets must be dealt with as an ancillary matter following any judgment on divorce, juridical separation or nullity (see [Question 14](#) to 16).

Singapore adopts the concept of "deferred community of property" in determining property rights of spouses (*Lock Yeng Fun v Chua Hock Chye* [2007] 3 SLR(R) 520; *NK v NL* [2007] 3 SLR(R) 743).

This means that, during the marriage, the legal title holder of the property can deal with such property in any way they wish. On the termination of the marital relationship, the court can add property acquired separately to a "community pool" over which both parties are entitled to a share and can divide it in accordance with section 112 of the Women's Charter.

Procedure

Not applicable.

9. How are foreign separation of property agreements and pre-nuptial and post-nuptial agreements treated by the courts in your jurisdiction?

In *TQ v TR*, the Court of Appeal was prepared to give significant weight or even full effect to a prenuptial agreement entered into by foreign nationals and governed by foreign law provided that:

- The prenuptial agreement was valid under the foreign law.
- The relevant foreign law did not violate the public policy of Singapore.

However, there is no blanket rule that all such agreements will be automatically enforced or always accorded significant weight. A nuptial agreement can be disregarded altogether when there has been, for example, clear fraud or other indications of unconscionability, making such agreements likely to be invalid under their governing foreign law in any event.

Divorce, Nullity and Judicial Separation

Recognition of Foreign Marriages/Divorces

10. Are foreign marriages/divorces/civil partnerships recognised in your jurisdiction?

Marriages

A foreign marriage is valid under Singapore law if both parties had capacity to marry under the laws of their respective countries (*Moh Ah Kiu v Central Provident Fund Board* [1992] 2 SLR(R) 440). This is provided that the marriage is between a man and a woman (section 12(1), Women's Charter).

A foreign marriage can be treated as invalid for lack of capacity or other grounds of invalidity under the law of the place where the marriage took place (*sections 105-108, Women's Charter; Arpinya Rongchotiawattana v Wee Oh Keng* [1997] 3 SLR(R) 378).

Divorces/Annulment

Singapore courts generally recognise a foreign divorce as a matter of international comity and where recognition of the divorce accords with public policy and the court's sense of "good morals".

There are generally three recognised bases for recognition of a foreign divorce judgment:

- Where the judgment was granted by a court of the domicile of one of the parties.
- Where the judgment was granted by a court which exercised jurisdiction on the same basis on which a Singapore court would have exercised jurisdiction.
- Where there is a real and sufficient connection between the court which granted the judgment and either party to the marriage.

(*Yap Chai Ling and another v Hou Wa Yi* [2016] 1 SLR 660.)

A foreign divorce will be recognised when pronounced under circumstances that do not offend natural justice (*Ng Sui Wah Novina v Chandra Michael Seitawan* [1992] 2 SLR(R) 111).

In *Weschler Mouantri Andree Marie Louise v Mouantri Karl-Michael and Another* [2009] SGHC 83, the High Court held that a Singapore court could not grant a divorce to a party whose marriage had already been dissolved by the Swedish Court.

Civil Partnerships

See [Question 36](#).

Divorce

11. What are the grounds for divorce?

Divorce

There is only one ground for divorce in Singapore, which is the irretrievable breakdown of the marriage. The following five facts prove an irretrievable breakdown of the marriage:

- The defendant has committed adultery and the claimant finds it intolerable to live with the defendant.
- The defendant has behaved in such a way that the claimant cannot reasonably be expected to live with the defendant.
- The defendant has deserted the claimant for a continuous period of at least two years immediately preceding the filing of the writ.
- The parties to the marriage have lived apart for a continuous period of at least three years immediately preceding the filing of the writ and the defendant consents to a judgment being granted.
- The parties to the marriage have lived apart for a continuous period of at least four years immediately preceding the filing of the writ.

(Section 95(3)(a) to(e), Women's Charter))

It is possible to obtain a divorce without alleging fault on the part of the other party if the claimant files the writ on the basis of separation (of three years with consent of the defendant, or four years absent consent).

If the applicant is relying on the first three facts above, the applicant is not be able to rely on their own behaviour.

A new additional sixth fact of divorce is established by the Women's Charter (Amendment) Act 2022 (new section 95A(f)) allowing a divorce application where parties mutually agree that their marriage has irretrievably broken down and the court further finds that there is no reasonable possibility that they might reconcile. This section has not come into force yet.

Same-sex marriage and civil partnership is not recognised in Singapore.

Nullity

A spouse can file for a judgment of nullity in respect of their marriage (section 104, Women's Charter). A marriage can be held void or voidable.

A marriage is void where:

- Either party is below the age of 18 years.
- The parties are within prohibited degrees of relationship as set out in the Women's Charter(section 10 and First Schedule) and have not obtained a special statutory marriage licence to wed.
- Either party has committed bigamy.
- The parties are not respectively male and female.
- The marriage is not formally solemnised.

(Section 105, Women's Charter.)

A marriage can be held voidable on the grounds of:

- Non-consummation due to the incapacity of either party or the wilful refusal of the defendant.
- Either party not validly consenting to the marriage, whether as a consequence of duress, mistake, unsoundness of mind or otherwise.
- Either party, although capable of giving a valid consent, suffering (whether continuously or intermittently) from a mental disorder making them unfit for marriage.
- The defendant suffering from a communicable venereal disease.
- The defendant being pregnant by some person other than the claimant.

(Section 106, Women's Charter.)

Claims for nullity (on the second to fifth grounds above) must be made within three years from the date of marriage (section 107(2), Women's Charter).

A claim that a marriage is voidable can be defeated if both:

- It can be shown that the plaintiff, knowing of the right to have the marriage avoided, by conduct led the other spouse to reasonably believe that they would not seek to avoid the marriage (section 107(1)(a), Women's Charter).
- It would be unjust to the defendant to grant the judgment (section 107(1)(b), Women's Charter).

The legitimacy of children born to a voidable marriage is not affected (sections 110(2) and 111(1), Women's Charter).

The legitimacy of children born to a void marriage is not affected if both or either of the parties reasonably believing that the marriage was valid at the time of the marriage contract (section 111(2), Women's Charter).

Judicial Separation

Applications for judicial separation can be made on the same facts as irretrievable breakdown of marriage under section 95(3) of the Women's Charter (see above, *Divorce*).

The courts have held that judicial separation does not end the marriage between the parties (*Sivakolunthu Kumarasamy v Shanmugam Nagaiah and anr [1987] SLR(R) 702*; *District Court in Lau Ca Cheng v Ho Kee Wai Tony [2014] SGDC 470*). Although the parties are no longer required to live with each other under section 101(2) of the Women's Charter, other obligations and restrictions to the marriage remain, such as the inability of either spouse to enter into another marriage until the marriage is fully dissolved.

12. What is the procedure and timeline for divorce?

Divorce

Proceedings for divorce, judicial separation and nullity of marriage are commenced by filing a writ, a statement of claim and a statement of particulars (rule 41(1), FJR).

There is a two-stage process to both contested and uncontested divorces:

- At the first stage, if the court finds that the marriage should be dissolved, it will grant an interim judgment of divorce.
- At the second stage, the court will deal with any ancillary matters (such as custody of children, maintenance of spouses and children and the division of matrimonial assets). At the end of the second stage, the court will grant the parties a final judgment.

If the parties agree to proceed on an uncontested basis and have agreed on all ancillary matters, they can apply for a simplified uncontested hearing track (rule 83(1), FJR) which usually entails document-only hearings (paragraph 15, FJC Practice Directions 2023). This track combines both of the above stages.

An interim judgment can be made final on a party's application after three months from the date of the judgment. The court can allow a shorter period (section 99, Women's Charter). Uncontested divorce proceedings therefore take about four months to conclude.

Contested divorce proceedings are comparatively rare. These can take between 12 and 18 months to be concluded.

Nullity

See above, *Divorce*.

Judicial Separation

See above, *Divorce*.

Religious Marriage and Divorce

13. Are customary and religious marriages and divorces recognised in your jurisdiction?

Muslim marriages are not recognised under civil law but are recognised under Syariah law. Muslim divorce proceedings and Muslim divorce orders are heard and granted by the Syariah Court.

The Syariah court will not make any maintenance order for the former wife or the children. Instead, two forms of financial provision can be granted to the former wife (*nafkah iddah* and *mutaah*). A wife can still seek maintenance for herself or for her children by filing a civil law application for maintenance from her husband at the FJC.

Religious marriages solemnised abroad will be valid and recognised in Singapore provided that both:

- The marriage was registered in accordance with and is valid under the law of the place in which it was contracted or celebrated.
- The parties both possessed the capacity to marry under the law of their respective countries of domicile.

Customary marriages solemnised before 15 September 1961 are deemed registered and valid (section 181, Women's Charter). Customary marriages contracted or effected between 15 September 1961 and 2 June 1967 are valid subject to limited exceptions (section 184, Women's Charter).

Customary marriages may be recognised in Singapore if they meet the general validity requirements in the Women's Charter. Marriages can be solemnised in any form or ceremony as long as it is:

- Based on the authority of a valid marriage licence.

- Done by the Registrar or a person licensed to solemnise marriages who is satisfied the parties freely consent to the marriage.
- Done in the presence of at least two credible witnesses.

(Sections 22 and 23, Women's Charter.)

Finances/Division of Assets

14. What powers do the courts have to allocate financial resources and property on the breakdown of marriage?

The court has wide discretion to order the division or sale of matrimonial assets between the divorcing couple, in proportions the court thinks just and reasonable (section 112(1), Women's Charter; *ATT v ATS [2012] 2 SLR 859*).

A court can make orders for:

- The sale of any matrimonial assets.
- Vesting:
 - any asset owned jointly by the parties in both the parties in common in shares the court deems just and equitable;
 - any matrimonial asset or any part of the asset in either party;
 - the asset or sale proceeds in any person to be held on trust for a period and on any specified terms.
- The postponement of sale or vesting of any share in any matrimonial asset, or any part of such share, until:
 - a future date;
 - the occurrence of a future event; or
 - the fulfilment of any specified condition.
- Granting either party the right to occupy the matrimonial home to the exclusion of the other party, for any period and terms the court deems fit.
- The payment of a sum of money by one party to the other.

(Section 112(5), Women's Charter.)

In deciding whether to order the division of matrimonial assets, the court must also consider the matters listed in section 114(1) including financial resources which each party has or is likely to have in the foreseeable future (section 114(1)(a), Women's Charter).

Where a party has no legal title in an asset, that asset can still be taken into account as a financial resource. If a party gives away assets, parting with its legal title but not its beneficial interest, the purported disposal can be viewed as an attempt to conceal true ownership of the asset and is a basis for adding the asset back into the matrimonial pool (*UZN v UZM [2021] 1 SLR 426*).

The FJC has no jurisdiction to determine the rights of third parties in matrimonial assets, or to affect a third party's interests by ordering assets to be sold or transferred (*UDA v UDB and Anr [2018] SGCA 20*). Any third party rights or interests must be dealt with in separate civil proceedings in the High Court. The divorce proceedings will usually be stayed pending their resolution.

A trust established by one spouse can be challenged as a sham, and the court asked to find that the trust is invalid and unenforceable. However, there is a strong presumption in favour of validity of a trust that weighs against a claim of a sham arrangement (*Chng Bee Kheng & Anr (executrices and trustees of the estate of Fock Poh Kum, deceased) v Chng Eng Chye [2013] 2 SLR 715*; *Toh Eng Tiah v Jiang Angelina and Anr (appeal) [2021] 1 SLR 1176*).

Singapore courts can treat assets settled under a trust as being joint matrimonial property if there is good evidence that the purported settlor retains significant control over them or they are in essence still the beneficial owner of the trust assets (*Kwee Lee Fung Ivon v Lim Gordon [2013] SGHC 228*; *Geok Hong Co Pte Ltd v Koh Ai Gek and others [2019] 1 SLR 908*).

It is challenging for one spouse to try to pierce the corporate veil of companies holding alleged assets said to be for the direct benefit of the other spouse (*Yeo Chong Lin v Tay Ang Choo Nancy & Anr [2011] 2 SLR 1157*; *TDS v TDT [2015] SGHCF 7 and VGN v VGO [2020] SGFC 26*).

15. What factors are relevant to the exercise of the court's powers?

The court's power is discretionary.

Unless a judgment for divorce, judicial separation or nullity has been pronounced, the court generally has no jurisdiction to exercise its statutory power to divide assets (*Ng Sui Wah Novina v Chandra Michael Setiawan [1992] 2 SLR(R) 111*).

Assets. Divisible matrimonial assets are defined as any asset of any nature acquired during marriage by one or both parties (section 112(10), Women's Charter). Any asset acquired by a party before marriage is not a matrimonial asset unless:

- The asset is ordinarily used or enjoyed by both parties or one or more of their children for shelter or transportation or for household, education, recreational, social or aesthetic purposes.
- The asset has been substantially improved during the marriage by the other party or both parties.

Any asset acquired at any time by gift or inheritance is not divisible, unless either:

- Substantially improved during the marriage by the other party or by both parties to the marriage.
- Used as the matrimonial home.

The above circumstances allow for gifts and inheritance to be transformed into matrimonial assets.

However, the Court of Appeal recently accepted that a third possibility can arise in property law where the recipient spouse manifested a clear and unambiguous intention to treat them as part of the matrimonial pool (*CLC v CLB* [2023] 1 SLR 1260).

Pure inter-spousal gifts are included in the pool of matrimonial assets without any additional conditions (*Wan Lai Cheng v Quek Seow Kee* [2012] 4 SLR 405 and *CLS v CLT* [2022] 2 SLR 1043). An unconditional gift made by a spouse of a third-party gift or an inheritance (inter-spousal re-gift) is not included in the pool of matrimonial assets.

The substantial improvement exception is not applicable to the latter. However, given the decision in *CLC v CLB*, it is possible that the treatment of inter-spousal gifts will be clarified by the courts.

Liabilities. Where a wife disavowed financial liability for a property that was initially a loss-making investment, she was precluded from claiming a share in it after the property turned out to be a lucrative investment (*Ong Boon Huat Samuel v Chan Mei Lan Kristine* [2007] 2 SLR(R) 729).

In a recent case, the High Court held that joint debts should be apportioned equally to both parties in calculations to determine their direct contributions (*WAS v WAT* [2022] SGHCF 7).

Awarding no share of matrimonial assets is justifiable only where a spouse has made no contributions to the marriage whatsoever (*Chan Tin Sun v Fong Quay Sim* [2015] SGCA 2).

The power to divide assets under the Women's Charter is exercised in a "broad-brush" fashion, that is, without requiring a detailed account of every sum each party has paid or incurred, or a meticulous investigation of the respective obligations rendered (*NK v NL* [2007] 3 SLR(R) 743).

This broad-brush approach is also justified by how the evidence in ancillary proceedings is usually tested in court, that is, generally by affidavit rather than by cross-examination (*USB v USA* [2020] SGCA 57). which makes it hard to assess exactly a party's indirect contributions to the marriage.

There is no legal presumption that the assets must be split equally between the parties (*Lock Yeng Fun v Chua Hock Chye* [2007] 3 SLR(R) 520; *UYP v UYQ* [2020] 3 SLR 683).

The statutory criteria considered when making dividing the assets under section 112 include the:

- Extent of monetary contributions by either party.
- Parties' property or work to the acquisition, improvement or maintenance of marital assets.
- Debts or obligations undertaken for the benefit of the family.
- Needs of any children.
- Extent of contributions to care for the family and relatives.
- Income, earning capacity and financial needs of the parties in the foreseeable future.
- Duration of the marriage.
- Age of the parties.

16. What is the court's current position on the division of assets?

Apart from long marriages where only one spouse is the sole breadwinner (*UBM v UBN [2017] SGHCF 13*), the courts adopt a structured approach to assess each party's contribution towards the marriage (*ANJ v ANK [2015] 4 SLR 1043*).

The process is as follows:

- **Step one:** the court ascribes a ratio that represents each party's direct contributions relative to each other, having regard to the financial contributions each party has made towards acquiring or improving the matrimonial assets.
- **Step two:** the court ascribes a second ratio to each party's indirect contributions relative to each other, having regard to both financial and non-financial contributions, and contributions to the wellbeing of the family.
- **Step three:** the court calculates the parties' overall contributions relative to each other by taking an average of the above ratios. Depending on the circumstances of each case, the direct and indirect contributions may not be accorded equal weight or significance.
- **Step four:** the court can make further adjustments to the average ratio to take into account other factors (such as those set out in section 112(2) of the Women's Charter and all other relevant circumstances) to arrive at a just and equitable division of the assets.

In cases involving long, single-income marriages, the structured approach does not apply (*TNL v TNK [2017] 1 SLR 609*). This is to ensure that homemaker spouses are not unduly disadvantaged. In such cases, there is an inclination towards equal division unless there are specific factors requiring a different division. The court must have regard to the factors in section 112(2) to arrive at a just and equitable division.

The approach set out in *ANJ v ANK* should continue to apply to mid-length and short marriages and the court should not generally incline towards equality of division (*USB v USA*).

In dual-income marriages, the structured approach applies. However, in long dual-income marriages, there is an inclination towards equal division, with the *ANJ v ANK* approach serving as a guide.

The court can, in principle, ascribe a negative percentage value to a party's indirect contributions. However, the threshold for this is high, and conduct must be both extreme and undisputed (*TQU v TQT [2020] SGCA 8*). Where both parties have embarked on mutually destructive behaviour, the court will generally not ascribe a negative value to their contributions (*UAP v UAQ [2018] 3 SLR 319*).

Failure to provide full and frank disclosure of assets and means can lead to the court drawing adverse inferences.

In *Chan Siew Fong v Chan Fook Kee [2002] 1 SLR(R) 93*, a wife in a 30-year marriage received 100% of the sole disclosed marital asset where the court believed that the husband had not made full and frank disclosure of assets abroad.

Where full disclosure is not given, the court can either give a higher proportion of assets to the "innocent" spouse or put a value to assets it considers to be "undisclosed" (*Yeo Chong Lin v Tay Ang Choo Nancy*).

Finances/Spousal Maintenance (Alimony)

17. How does ongoing spousal maintenance operate following marital breakdown? Is maintenance awarded for a fixed term or on an open-ended basis? Is there a set formula or do judges have discretion over quantum and term?

Spousal Maintenance

The legal duty to provide maintenance to a spouse or ex-spouse has traditionally been placed solely on the husband or ex-husband.

The Women's Charter was amended in 2016 to render former wives liable to maintaining former husbands who become incapacitated during the marriage and who cannot maintain themselves (section 113, Women's Charter). The incapacity can stem from "any physical or mental disability or any illness" which prevents the former husband from earning a living and maintaining himself.

The court's power under section 113(1)(b) to order a husband to pay maintenance to his former wife is supplementary to the court's power under the Women's Charter to provide for a just and equitable division of the matrimonial assets (*BG v BF [2007] 3 SLR(R) 233*).

Maintenance can also be claimed on an interim basis pending the hearing of matrimonial proceedings and at the final hearing of ancillary matters (section 113, Women's Charter).

The court must have regard to all the circumstances of the case when awarding maintenance including:

- Income.
- Earning capacity.
- Property.
- Parties' ages.
- Financial resources.
- Needs and obligations.
- Standard of living of the family before the breakdown of the marriage.
- Duration of marriage.
- Any physical or mental disability.

- Financial and non-financial contributions.

(Section 114(1), Women's Charter.)

There is no broad principle that a husband who has not maintained a wife during the marriage is automatically absolved of the need to do so post-divorce.

A former wife must, where possible, make reasonable efforts to secure gainful employment and contribute to preserve her pre-breakdown lifestyle. The court assesses the reasonableness of a spousal maintenance claim taking into account the husband's ability to pay (*Foo Ah Yan v Chiam Heng Chow* [2012] 2 SLR 506).

Basis for Award

Maintenance can be awarded on either a fixed term or open-ended periodic basis. A lump sum award will have a fixed payment due date.

The court in *AYM v AYL* [2014] 4 SLR 559 held that a lump sum maintenance payment would allow for a clean break in the marriage, reduce risk of future defaults and should be available whenever feasible, although is not appropriate if it would financially ruin the paying party.

Maintenance by way of periodical payments (section 115, Women's Charter), is usually payable monthly.

An open-ended obligation to pay maintenance expires

- On the death of either spouse or on remarriage of the recipient party (when unsecured).
- On the death or remarriage of the recipient party (when secured).

(Section 117, Women's Charter.)

Fixed Formula or Court Discretion

There is no set formula for computing the quantum of a maintenance order. Judges have discretion full over its amount and term based on all the circumstances of the case.

The court considers the section 114(1) factors listed above under *Spousal Maintenance*.

Parties should be, as far as is practicable, put in the financial position they would have been in had the marriage not broken down and where each party properly discharged their financial responsibilities to the other (section 114(2), Women's Charter).

Judges also exercise discretion over variation of existing maintenance orders under section 119 of the Women's Charter, where satisfied that there has been any material change of circumstances. Courts will take into account the overall financial position of both parties and will act where the status quo would no longer be fair (*CSW v CSX* [2022] SGHC 223).



18. Is it common for maintenance to be awarded on marital breakdown?

Maintenance for a wife is often claimed and awarded during the course of any matrimonial proceedings or pending the conclusion of matrimonial proceedings as part of the ancillary matters. The court can only order a wife to pay maintenance to her husband if he is incapacitated (section 69, Women's Charter).

19. What is the court's current position on maintenance on marital breakdown?

Interim maintenance is usually intended to provide a "tide over" sum for the applicant until the final hearing. It does not usually preserve the status quo during the marriage.

Evidence of the standard of living during marriage is considered by the court as a rough estimate. A final award for maintenance usually exceeds an interim award of maintenance (*Lee Bee Kim Jennifer v Lim Yew Khang Cecil* [2005] SGHC 209).

If maintenance is applied for as part of the ancillary proceedings and dismissed, no further applications can subsequently be made by the former wife or former incapacitated husband (*Tan Bee Giok v Loh Kum Yong* [1996] 3 SLR(R) 605; *APE v APF* [2015] 5 SLR 783).

To preserve the right of a former wife or a former incapacitated husband to apply for maintenance in the future, an order for nominal maintenance (such as SGD1 per month) is usually sought so that this can be varied upwards later if there is a material change of circumstances (section 118, Women's Charter). This is not, however, ordered as a matter of course, since it would make the husband "a general insurer of sorts", which courts consider to be an undesirable outcome (*ATE v ATD* [2016] SGCA 2).

Where the wife is capable of earning a comfortable income, has substantially more assets and is financially independent, the court will generally not award the wife any maintenance. In *ADB v ADC* [2014] SGHC 76, Choo J stated that "[t]he idea that maintenance is an unalloyed right of a divorced woman is an idea borne from the time when women were housewives living on the maintenance of the men".

The court can take into account any economic prejudice suffered by the husband or wife during marriage when ordering maintenance for the financially disadvantaged spouse (*Tan Sue-Ann Melissa v Lim Siang Bok Dennis* [2004] 3 SLR(R) 376).

Where an order for the division of the matrimonial assets is not significant in money's worth, the court can order substantial maintenance (*BG v BF* [2007] 3 SLR(R) 233). The converse is also true (*Lock Yeng Fun v Chua Hock Chye* [2007] 3 SLR(R) 520).

Maintenance awards are determined flexibly with "a common sense dose of realities" and without reference to any single formula (*Foo Ah Yan v Chiam Heng Chow*).

Finances/Child Support

20. What financial claims are available to parents on behalf of children within or outside of the marriage?

Parents can apply for maintenance for their children irrespective of whether the parents are married to each other.

Maintenance can be ordered in the form of a monthly allowance or a lump sum, on due proof that a parent has neglected or refused to provide reasonable maintenance for their child who is unable to maintain themselves (section 69(2), Women's Charter). The courts do not generally grant lump sum maintenance for children.

The duty to maintain a child is imposed on both parents (*AUA v ATZ [2016] SGCA 41*), save that the parent who earns more will typically bear a larger portion of the child's expenses. Both parents are under an obligation to maintain or contribute to the maintenance of their biological or adoptive child. They must provide the child with reasonable accommodation, clothing, food and education. This duty applies regardless of whether:

- The child is in the custody of either parent.
- The child is legitimate or illegitimate.

(Section 68, Women's Charter.)

The Family Division of the High Court declined to grant a same-sex couple joint custody, shared care and control or guardianship of children in *VET v VEU [2020] 4 SLR 1120*, on the basis that there was no need to do so, given the lack of any dispute between the couple over the care of the children. It remains to be seen how such legal issues will be decided in any future case where disputes may exist.

See [Question 27](#) for the definition of "child of the marriage".

Where a person has accepted a child who is not their biological offspring as a member of their family, it is their duty to maintain that child until the child is 21 as far as the natural parents of the child fail to do so (section 70, Women's Charter).

This provision enables the non-legally recognised caregiver/parent to remain liable for the child's maintenance. However, the obligation to maintain the child ends if the child is taken away by their natural father or mother. Sums expended by the person to maintain the child will become recoverable as a debt from the child's natural parents (section 70, Women's Charter).

The court can rescind or vary any maintenance order on proof of a change in circumstances of the parties or child or any good cause shown to the court's satisfaction. The court can take into consideration changes in general costs of living which may have occurred since the last order was made (section 72 and 73, Women's Charter).

21. On what basis is child maintenance calculated?

The Singapore courts do not use a maintenance calculator.

When ordering child maintenance, the court must have regard to all the circumstances of the case, including:

- The financial needs of the child.
- Income, earning capacity, property and financial resources of the parents.
- Any disability of the child.
- The age of the parents.
- The duration of the parents' marriage.
- The contributions made by the parents to the welfare of the family.
- The standard of living enjoyed by the child before the parent ceased providing reasonable maintenance for the child.
- The manner in which the child is being educated or trained.
- The conduct of the parents.

(Section 69(4), Women's Charter.)

If the court finds that a parent has failed to provide reasonable maintenance for their child, the court can order the parent to pay maintenance monthly or as a lump sum (section 69(2) Women's Charter.)

22. What is the duration of a child maintenance order (up to the age of 18 years or otherwise)?

Maintenance can be ordered for the benefit of a child of the marriage who is under 21 during matrimonial proceedings (sections 69(5) and 127, Women's Charter). Child maintenance can be sought on an interim basis and at the final hearing of ancillary matters.

A child who is over 21 is still entitled to maintenance if they:

- Have a mental or physical disability.
- Are undertaking compulsory military service.
- Are undertaking educational or vocational training.

(Section 69(5), Women's Charter.)

A parent is not always obliged to maintain the child under the above circumstances after the age of 21. The High Court reversed a decision ordering the father to pay 60% of expenditure for his son's education in Canada (*UYT v UYU [2020] SGHCF 80*). The son was 22 and had become an independent adult and in any event was not then undergoing education.

23. Can a child (whether of legal maturity or otherwise) make a claim directly against their parents?

A child can make a claim directly against parents or the person who has accepted the child as a member of the family when the child has reached the age of majority (that is, 21) (sections 69(3)(b), 70(4)(b), Women's Charter) (however, see also [Question 22](#)).

If the child is a minor, a guardian or a person who has actual custody of the child or siblings of the child who have reached the age of 21 can make a claim on behalf of the minor (sections 69(3)(a(c)) and 70(4)(a(c)), Women's Charter).

Maintenance claims made by parties who are not parents and who do not have guardianship status are unlikely to be permitted under the current legislation.

In addition, any person appointed by the Minister, can apply for maintenance for a child where reasonable maintenance has not been provided by a parent (section 69(3), Women's Charter).

Enforcement of Financial Orders

24. What are the main methods of enforcement to ensure compliance with financial orders following divorce/dissolution in your jurisdiction?

Compliance with financial orders, including maintenance orders, can be enforced through:

- A writ of seizure and sale.
- Garnishee proceedings.
- Appointment of a receiver.
- Order of committal.

(Rule 690, FJR.)

An application must be made by the spouse seeking to enforce the order following a breach.

In addition, if a party fails to make one or more payments required under a maintenance order, the court can also:

- Direct the amount due to be levied in the manner by law provided for levying fines imposed by a Magistrate's Court.
- Sentence the person to imprisonment for up to one month for each month's allowance that remains unpaid.
- Order the person to provide security against any future defaults via a banker's guarantee.
- Order the person to undergo financial counselling or any similar or related programme the court directs.
- Make a community service order (such as for unpaid community service for up to 40 hours).

(Section 71, Women's Charter.)

Under the proposed amendments made to the Women's Charter through the Family Justice Reform Act 2023, a new maintenance enforcement process is expected to be available.

This will empower Maintenance Enforcement Officers to obtain information about a parties' assets and means directly from various entities including government agencies.

This improved process will allow the Singapore courts to distinguish between respondents who cannot pay from those who refuse to pay and to make an order for proof of payment.

A failure to comply with the relevant payment order will result in a term of imprisonment unless there are special circumstances.

Respondents who are unable to pay will be directed to seek appropriate assistance and to work out more sustainable maintenance arrangements.

25. What is the legal position on the reciprocal enforcement of financial orders?

Maintenance orders can be enforced against persons living in reciprocating countries (and vice versa) by registering them under the *Maintenance Orders (Reciprocal Enforcement) Act 1975* (MO(RE)A). A registered foreign maintenance order can be enforced as though it was made locally (section 8, MO(RE)A).

Where there is a provisional maintenance order made in a reciprocating country, the MO(RE)A provides that the foreign order can be confirmed by the Singapore courts. For courts to confirm the foreign order, an applicant must provide a:

- Certified copy of the order, together with a duly authenticated document which sets out or summarises the evidence given in the proceedings where the evidence was made.
- Statement of the grounds on which the making of the order might have been opposed by the payer.

(Section 7(2)(a),(b) MO(RE)A.)

Where the spouse has established any grounds on which a maintenance creditor might have opposed the making of the original order, the Singapore courts can refuse to confirm the foreign order.

On registration and confirmation of the foreign order, the order is then enforceable in the Singapore courts in the same way as a Singaporean maintenance order (section 8, MO(RE)A).

Where a foreign maintenance order is not made in a reciprocating country, a party intending to enforce the order must either:

- Start a civil action based on the foreign judgment (*Hong Pian Tee v Les Placements Germain Gauthier Inc [2002] 1 SLR(R) 515*, *Murakami Tokako v Wiryadi Louise Maria [2007] 4 SLR(R) 565*). The foreign judgment must be:
 - made on the merits by a court with competent jurisdiction;
 - final and conclusive under the law of that country and for a fixed or ascertainable sum of money.

A foreign judgment is regarded as final and conclusive even though an appeal may be pending against it or subject to any appeal generally.

- Apply for financial relief following a foreign divorce under Chapter 4A, Part X of the Women's Charter (*Tan Poh Beng v Choo Lee Mei [2014] 4 SLR 462*) (see [Question 19](#)).

Singapore is not a party to the [Hague Convention on the International Recovery of Child Support and Other Forms of Family Maintenance](#).

Financial Relief after Foreign Divorce Proceedings

26. What powers are available to the court to make orders following a foreign divorce? If such a power exists, what is the legal basis for making such an application?

Chapter 4A Part X of the Women's Charter empowers the court to allow parties divorced in a foreign country to apply for ancillary relief orders in Singapore.

A party can apply for such orders, where both:

- A marriage has been dissolved or annulled, or the parties to the marriage have been legally separated, by judicial or other proceedings in a foreign country.
- The foreign divorce, annulment or judicial separation is recognised under Singapore law.

(Section 121B, Women's Charter.)

An order for financial relief in foreign divorce proceedings is not an automatic right. Permission of the court is required before Chapter 4A proceedings can be commenced (section 121D, Women's Charter). It must be shown that both:

- The Singapore Court has jurisdiction over the matter.
- There is a "substantial ground" for making the application.

The court can grant permission even where an order has been made by a competent foreign court requiring the other party to the marriage to make any payment or transfer any matrimonial asset to the applicant or a child of the marriage (section 121D(3), Women's Charter).

To establish the Singapore Court's jurisdiction, a party applying for an order for financial relief must show that either:

- One of the parties to the marriage was domiciled in Singapore at the time of the application or the date on which the divorce, annulment or judicial separation obtained in a foreign country took effect in that country.
- One of the spouses was habitually resident in Singapore for a continuous period of one year immediately preceding the date of the application or the date on which the divorce, annulment or judicial separation obtained in a foreign country took effect in that country.

(Section 121C, Women's Charter.)

Generally, a "substantial ground" is made out if it would prima facie be appropriate for the Singapore Court to grant relief, having regard to the factors under section 121F Women's Charter and keeping in mind that the purpose of the application for permission is to filter out hopeless, frivolous or unmeritorious cases (see *UFN v UFM [2019] 2 SLR 650*). However, not every factor must be considered.

The court will consider issues such as the:

- Powers of the foreign court to grant financial relief.
- Orders made by the foreign court.
- Relevant circumstances behind the making of the foreign orders or why no orders were made.

(*Harjit Kaur d/o Kulwant Singh v Saroop Singh a/l Amar Singh [2015] 4 SLR 1216*.)

In *UJM v UJL [2021] SGHC(A) 10*, the court held that a settlement agreement between the parties did not preclude Singapore courts from granting additional relief in an application under Chapter 4A of the Charter in the interest of justice, taking into account the parties' interests and children of the marriage.

In *Harjit Kaur*, the court noted that where financial relief has already been granted by the foreign court, the Singapore courts had to be cautious not to make any order that will allow a party to have "a second bite of the cherry" or offend the fundamental rule of comity between courts of competent jurisdiction.

Children

Custody/Parental Responsibility

27. What is the legal position in relation to custody/parental responsibility following the breakdown of a relationship or marriage? Do local courts in your jurisdiction recognise parenthood that has been established in another jurisdiction for the purposes of custody/parental responsibility, maintenance and so on?

General Position for Custody/Parental Responsibility

The court generally makes orders for joint custody on the basis of the concept of joint parental responsibility (*CX v CY* [2005] 3 SLR(R) 690). This means that major decisions about the child's upbringing, health, education and religion should be jointly decided. If no agreement can be reached, the court will decide on disputed matters in the best interests of the child.

The courts only make sole custody orders in exceptional situations, such as when there is physical, sexual or emotional abuse of the child by one parent, or where the relationship between the parties is such that co-operation is impossible and harmful to the child (*VLI v VLJ* [2022] 5 SLR 301)(affirming *CX*).

The court usually grants one of the parents sole care and control. The parent with that right makes the day-to-day decisions regarding the child's upbringing and the child will usually live with that parent (*AQL v AQM* [2012] 1 SLR 840). In deciding which parent should be given care and control, the following trends emerge from local case law:

- All things being equal, the mother is preferred if the child is young (*Soon Peck Wah v Woon Che Chye* [1997] 3 SLR(R) 430).
- There is a preference towards preserving the status quo and continuity of living conditions (*Wong Phila Mae v Shaw Harold* [1991] 1 SLR(R) 680; *VLI v VLJ* [2022] 5 SLR 30).
- Siblings should not be separated (*IW v IX* [2005] SGCA 48).
- Shared care and control may not be suitable where the child has developmental needs and the parties have a stark contrast in parenting styles making it challenging to achieve a high level of co-operation between the two parents (*TAU v TAT* [2018] SGHCF 11; *VMG v VMH* [2021] SGHCF 31).

The parent without care and control is usually granted rights of access to visit the child or to have the child stay with that parent for defined periods.

The court takes into account wishes of parents and the child (if of sufficient maturity) as well as continuity or stability of care arrangements for the child when deciding on these issues. Children's orders are not made automatically but only after proper scrutiny in each case.

Courts have been more willing to incorporate multi-disciplinary resources for custody and access orders. For example, the court in *CLB v CLC* [2022] SGHCF 3 appointed a social service professional facilitator to help the father with access to communicate with the children. Similarly, the court gave great significance to relevant social science findings on trauma induced by distressing handovers in *WAY v WAZ* [2022] SGCHF 14.

Parenthood Established in Another Jurisdiction

There is no definition of a "parent" in the Women's Charter.

"Child of the marriage" is defined as any child below 21 years old of the husband and wife, including adopted and step-children, who was a member of the family of the husband and wife at the time they ceased to live together or immediately preceding the divorce proceedings, whichever first occurred (sections 92 and 122, Women's Charter).

A husband and wife are mutually bound to co-operate with each other in safeguarding the interests of the union and in caring and providing for the children (section 46(1), Women's Charter).

A parent's duty under the Women's Charter is to maintain or contribute to the maintenance of their children, by providing them with accommodation, clothing, food and education as may be reasonable having regard to their means and station in life. (section 68, Women's Charter).

Parenthood established in another jurisdiction that is recognised as valid in Singapore law is likely to be considered a valid basis for determining parental responsibility by the Singapore courts (*VET v VEU [2020] SGHCF 4*).

This means that parents from abroad can claim relief for their children in the Singapore divorce proceedings as long as they fulfil other jurisdictional requirements (see [Question 2](#)).

However, foreign court orders for custody and maintenance are not automatically enforced in Singapore. The court has a statutory duty to have regard the welfare of the child as its first and paramount consideration in any proceedings pertaining to a child's custody or upbringing under section 3 of the Guardianship of Infants Act 1934. The court can decline to enforce the foreign court order if it is found to be against the welfare of the child (*TSH v TSE [2017] SGHCF 21*).

28. What is the legal position in relation to access/contact/visitation following the breakdown of a relationship or marriage?

Access gives a parent the right to regular contact with the child. The court can make access orders for children to spend time and maintain a healthy relationship with the non-resident parent. The parent with care and control of the child is expected to facilitate access between the child and the other parent.

Unsupervised access is usually the appropriate order, barring exceptional circumstances (*APE v APF [2015] SGHC 17*).

Supervised access is appropriate if there are risks of emotional, physical or sexual abuse. Supervised access can be facilitated by a trusted third party or can be taken at one of Singapore's Divorce Support Specialist Agencies (DSSA).

Parents can opt for reasonable and liberal access arrangements, which are typically not rigidly structured. However, parents need to be flexible and co-operative for such arrangements to work. Alternatively, access can be scheduled, and details of any agreed access arrangements can be stipulated in a court order or written agreement.

While the term "assisted access" has the same effect as "supervised access" (*UOI v UOJ [2018] SGFC 77*), "accompanied access" is different from "supervised access", for example, in a recent case the court-ordered accompaniment of the mother's

domestic helper was for the benefit of the father in taking care of the child, rather than to supervise the father (*TRY v TRZ [2021] SGFC 13*).

Orders can be made for overseas access, including directions for the provision of travel itineraries and contact details and the handover of the child's travel documents before overseas trips take place (*URM v URN [2018] SGFC 119*).

Child custody and access orders made by a court will last until the child reaches 21 years of age.

If circumstances allow (for example, in high-conflict proceedings involving children where there is a high possibility that the child would be adversely affected), the court can also order a child representative to represent the interests of the child and make recommendations to the court as to appropriate child welfare orders.

A parenting co-ordinator can be appointed to address or resolve any disagreement about any parenting matter arising from any relationship issue between spouses or former spouses or between a parent and a child. The appointed parenting co-ordinator can also be directed by the court to prepare a report.

International Abduction

29. What is the legal position on international abduction?

Singapore acceded to the Hague Child Abduction Convention in 2010. The International Child Abduction Act 2010 (ICAA) came into force in Singapore in 2011. Singapore aims to ensure the prompt return of children who have been removed from their habitual residence, unless the child is shown to have settled into their new environment.

The Ministry of Social and Family Development is the designated Central Authority to implement Singapore's obligations under the Convention.

As at 14 November 2022, there are 103 contracting parties that have mutual reciprocal enforcement arrangements with Singapore for children under the Convention, including the UK and the US.

In cases relating to international abduction of children, the courts apply the ICAA together with the relevant articles of the Convention, unless at the time the child is wrongfully retained the other state is not gazetted as a "contracting state" under the ICAA. In such cases, the courts will apply the welfare principle under general law (*TSF v TSE [2018] 2 SLR 833*).

The court will not examine the substantive merits of custodial disputes in ICAA proceedings, as it is presumed that the court in the child's home country will rule on these issues. The defences under Article 13(b) of the Convention to ordering the return of an abducted child are not invoked lightly (*BDU v BDT [2014] SGCA 12*). These include grounds where:

- The complaining parent had consented or subsequently acquiesced in the removal/retention of the child.
- There is a grave risk that the child's return would expose them to physical or psychological harm, or otherwise place the child in an intolerable situation.

- The child is old enough and sufficiently mature to object to being returned to the country of the complaining party, and it is appropriate for the court to respect the child's wishes.

The decisive factors a Singapore court will consider in any abduction case are the child's habitual residence and their best interests.

In *TUC v TUD [2017] SGHCF 12*, the High Court (Family Division) provided guidance to determine "habitual residence" for the purposes of Article 3 of the Hague Child Abduction Convention.

Leave to Remove/Applications to Take a Child Out of the Jurisdiction

30. What is the legal position on leave to remove/applications to take a child out of the jurisdiction? Under what circumstances can a parent apply to remove their child from the jurisdiction against the wishes of the other parent?

No person is allowed to take a child who is subject to an order of custody or care and control out of Singapore, except with the written consent of both parents or permission of the court (section 126(3), Women's Charter). A person with custody or care and control of the child can take the child out of Singapore for up to a month without consent or permission of the court.

In relocation applications, the court is concerned only with the paramount welfare of the child, and this overrides all other considerations (*BNS v BNT [2015] 3 SLR 973*).

The welfare of the child "is often so inextricably intertwined with the general well-being and happiness of the primary caregiver that the court is loath to interfere with important life decisions of the primary caregiver, so long as they are reasonably made and are not against the interests of the child" (*AZB v AYZ [2012] 3 SLR 627*).

In this case, the court took into account the wife's alienation, isolation and vulnerability in Singapore, and the benefits which relocating to the US would have on the wife's emotional and financial wellbeing as the child's main carer.

The reasonable decision of the primary carer to relocate is not "an insurmountable factor" in deciding an application (*AZB v AYZ; BNT v BNS [2014] 4 SLR 859, BNS v BNT [2015] SGCA 23; TAA v TAB [2015] SGHCF 1*).

However, while the mother's reasonable wishes are not determinative, they must be considered in the light of the tangible benefits relocation would have for her care of the children (*UFZ v UFY [2018] 4 SLR 1350*).

There is no presumption for or against relocation (*UXH v UXI [2019] SGHCF 24*).

The court can refuse an application after weighing up all the individual factors in the best interests of the child, since the welfare of the child outweighs all other considerations, however powerful and reasonable they may be. The factors to be weighed include the child's:

- Loss of relationship with the parent left behind.

- Well-being in their current country of residence.
- Developmental needs, including cognitive, emotional, academic and physical needs.
- Attachment to each parent.

In a recent case, the court observed that relocation is often not granted where parents and children have lived in and regarded Singapore as their home for a substantial period or the parent desiring relocation has been away from their home country for a substantial part of their life (*UYK v UYJ* [2020] 5 SLR 772).

In this case, the court granted relocation, considering among other things, that both parties had no roots in Singapore and the child was young enough to adapt to a new environment. In deciding whether to allow relocation, the welfare of the child is the paramount consideration.

Where the factors weigh in favour of allowing relocation from Singapore, the court generally emphasises the importance of ensuring the left-behind parent has liberal access to the children to mitigate the impact of being physically apart (*UFZ v UFY* [2018] 4 SLR 1350).

Surrogacy and Adoption

Surrogacy Agreements

31. What is the legal position on surrogacy agreements in your jurisdiction? Is surrogacy available to individuals and cohabiting couples (both heterosexual and same-sex)?

The provision of surrogacy services is currently prohibited in Singapore. However, obtaining surrogacy services overseas is not currently prohibited under the law.

In *UKM v Attorney-General* [2019] 3 SLR 874, the High Court found that the welfare considerations of the child (in being adopted by his natural father) outweighed other potential public policy considerations.

Following the passage of the Adoption of Children Act 2022 (Adoption Act) and amendments to the Singapore Constitution in 2022 (see [Question 36](#)), the eligibility criteria for adopting children has been tightened. A joint application for adoption can only be made by couples who are in a validly recognised marriage under Singapore law. (section 4(1)(a), Adoption Act).

However, current case law suggests that the non-biological parent of a surrogate child will not be granted guardianship where there is already a parent or guardian with parental responsibility for the child. In *VET v VEU*, the court held that it only had the power to appoint guardians within the circumstances in sections 6, 7 and 10 of the Guardianship of Infants Act 1934 or if necessary for the protection of the child.

Adoption

32. What is the legal position in relation to adoption? Is adoption available to individuals and cohabiting couples (both heterosexual and same-sex)?

Adoption is governed by the Adoption Act. Under the Act, an applicant must be at least 25 years old and at least 21 years older than the child. The court can waive these requirements if it thinks fit where either:

- The applicant and the child are close blood relatives within the prohibited degrees of consanguinity (blood relations).
- As an exceptional measure, it is right to allow the adoption.

A sole male applicant is generally not allowed to adopt a girl unless there are special circumstances that justify adoption as an exceptional measure (section 5(1)(c)), Adoption Act). The Act also requires that both the applicant and child are resident in Singapore (sections 4(1)(a)(i) and 6(1), Adoption Act).

A joint application to adopt a child must be by a married heterosexual couple (section 4(1)(a), Adoption Act). Therefore, cohabiting couples or same-sex couples cannot jointly adopt a child.

In addition to the above requirements, the court will only make an adoption order if:

- The adoption serves the welfare of the child.
- The consent of every parent or guardian of the child, or person who has actual custody of the child, or who is liable to contribute to support the child, is obtained.
- There is no payment in connection with the adoption.

Cohabitation

33. What legislation (if any) governs division of property and financial claims for unmarried couples on the breakdown of the relationship?

There is no legislation in Singapore that specifically governs division of property for unmarried couples on the breakdown of their relationship (*Chia Kum Fatt Rolfston v Lim Lay Choo [1993] 2 SLR(R) 793*). Property and assets of cohabittees are dealt with under ordinary principles of general property law.

In *USB v USA*, the Court of Appeal held that any period of cohabitation between parties before marriage is not to be taken into account when determining the length of a marriage and assessing parties' indirect contributions to a marriage.

Family Dispute Resolution

Mediation, Collaborative Law and Arbitration

34. What non-court-based processes exist to resolve disputes? Is alternative dispute resolution mandatory? What is the current status of agreements reached through mediation, collaborative law and arbitration?

In recent years, the FJC has emphasised alternative dispute resolution (ADR) in the family law landscape.

Mediation is currently the most used process in Singapore for family disputes.

Mediation is either conducted privately or at a mediation institution by:

- Court mediators.
- Volunteer mediators at Maintenance Mediation Chambers (MMC) (to handle cases of spousal and child maintenance and enforcement).
- A judge-mediator at the Child Focused Resolution Centre (CFRC), which provides mandatory counselling and mediation services for families with children at the start of divorce proceedings, where there are children under 21.

The Counselling and Psychological Services (CAPS) department of the FJC also provides mediation, counselling and psychological support to parties and children in appropriate cases.

In 2014, the Family Dispute Resolution Division was established to encompass the FRC, CFRC, MMC and CAPS.

Agreed matters can be recorded via a consent order.

In the last decade, Collaborative Family Practice (CFP) has emerged as a way to resolve a divorce amicably by avoiding litigation and litigious communication. If all divorce and ancillary matters issues are resolved during CFP, the parties can proceed to file uncontested divorce papers under a simplified hearing track.

Agreements for ancillary matters between parties become enforceable only after they have been reviewed by the court and adopted as orders of court (*AOO v AON*; *AYM v AYL [2013] 1 SLR 924*).

In the Family Justice Court Workplan speech of 18 March 2022, Presiding Judge Debbie Ong emphasised that Singapore's family justice system continues to further the principles of "therapeutic justice". Justice Ong highlighted the amount of effort and personal responsibility required by legal practitioners to give effect to therapeutic justice.

See [www.judiciary.gov.sg/docs/default-source/news-and-resources-docs/pj-workplan-address-2022-18-mar-2022-\(final\).pdf](http://www.judiciary.gov.sg/docs/default-source/news-and-resources-docs/pj-workplan-address-2022-18-mar-2022-(final).pdf).

To date, arbitration is not part of the family law legal framework. Pre-writ mediation and neutral evaluation is possible as part of the family law framework.

35. What is the statutory basis (if any), for mediation, collaborative law and arbitration?

The court can refer parties to mediation or counselling (sections 139I and 139J, Women's Charter; section 26(9), FJA) and must order mandatory mediation or counselling where there is at least one child of the marriage who is under 21 (section 139I, Women's Charter).

Section 12(6) of the Mediation Act 2017 provides for mediated settlement agreements in family law matters, provided no proceedings have been commenced in any court.

International mediation settlements under the Singapore Convention on Mediation Act 2020 can also be recorded in court under section 12(6) of the Mediation Act (section 6(3), Mediation Act 2017).

Civil Partnership/Same-Sex Marriage

36. What is the status of civil partnership/same-sex marriage? What legislation governs civil partnership/same-sex marriage?

Singapore does not recognise civil partnerships. Marriages between persons of the same sex are void under the Women's Charter (section 12(1), Women's Charter).

A 2022 amendment to the Constitution enshrined marriage as "a union between a man and a woman" (Article 156, Constitution). However, a marriage between a person who has undergone a sex reassignment procedure and a member of the opposite sex is valid (section 12(2), Women's Charter).

Media Access and Transparency

37. What is the position regarding media access to and press reporting of family law cases?

All matters and proceedings in a FJC must be held in private (section 10(1), FJA; paragraph 87, FJC Practice Directions).

Actions not governed by the FJA (for example, those under transitional provisions) can still be ordered to be held in private under section 8(2) of the Supreme Court of Judicature Act 1969 (*BMI v BMJ [2017] SGHC 112*).

The court has power to hear any matter or any part of a matter in open court if the court is satisfied that it is expedient in the interests of justice, or for other sufficient reason (section 10(2), FJA).

Under rule 671(1) of the FJR, judgments given in proceedings heard in private are generally not available for public inspection. Reported judgments in family hearings are redacted for anonymity.

The publication of, reporting and commenting on the following is prohibited:

- Any affidavit or statutory declaration adduced as evidence or referred to in any hearing in open court or in chambers or any other court document which has not been served on the relevant parties in the proceedings.
- Any statement made in chambers by anyone which is expressly stated to be confidential or is impliedly confidential.

(Paragraph 163, FJC Practice Directions.)

Further, reports or comments in public on court cases must not flout any existing law or court order or be calculated to effect, or be reasonably capable of affecting, the outcome of any decision by the court (paragraph 163(2), FJC Practice Directions).

Succession Rights on Divorce/Dissolution

38. How does divorce impact succession and estate planning in your jurisdiction?

An existing will generally remains valid on divorce (section 15, Wills Act 1838). An ex-spouse is still entitled to the other former spouse's assets under a will made during the marriage unless a new will has been made after the divorce. However, a new marriage will automatically revoke an existing will (section 13(1) Wills Act).

If no will was made before an individual's death, an ex-spouse is not entitled to a share or claim against the estate of the deceased individual. Only legal spouses are entitled to a share or claim against the estate of a deceased individual (section 7, rules 1 to 5, Intestate Succession Act). Otherwise, the estate is shared among descendants, parents, siblings or other relatives of the deceased individual (section 7, rules 6 to 9, Intestate Succession Act).

A spouse's succession rights are only extinguished on the issue of the final divorce judgement. A final judgement of divorce cannot be granted by the courts if the spouse is already deceased (*Yap Chai Ling v Hou Wa Yi [2016] 4 SLR 581*).

A judicially separated spouse cannot claim in the intestacy of the other spouse (section 103, Women's Charter).

Controversial Areas and Reform

39. What areas of the law (if any) are currently undergoing major change? Which areas of law are considered to be particularly controversial?

Notable reforms in family law include the following:

- The *Women's Charter (Amendment) Act 2022* makes significant changes to the Women's Charter including:
 - introducing divorce by mutual agreement;
 - enhancing the courts' powers to enforce child welfare orders.

Whilst passed, these are not yet in force.

- The Women's Charter (Family Violence and Other Matters) (Amendment) Act expands the definition of "family violence" and enhances the courts' powers to restrain perpetrators of family violence.
- The Family Justice Reform Act in 2023 (which is not in effect yet) introduces a new maintenance enforcement process and empowers courts to disallow filings of unjust or unnecessary court applications.
- The Adoption of Children Act 2022 makes the welfare of a child the key focus of adoption law, but which also tightens the eligibility for applying for an adoption. The Act also introduces more safeguards to assess the suitability and readiness of persons seeking to adopt.

The following areas of law are currently considered controversial:

- There is still no direct enforceability of pre-nuptial and separation agreements.
- Maintenance for men still remains less common than maintenance for women since the maintenance regime in Singapore only applies incapacitated husbands (see *Question 17 to 10*). There is still scope for making spousal maintenance provisions under the Women's Charter more gender-neutral, especially given the increasing numbers of wives earning more than their husbands.
- There is no financial protection for co-habitees or individuals who are not in a recognised legal marriage, whether with regard to maintenance or division of assets.
- Financial or economic abuse has not yet been explicitly included under the new definition of family violence under the Women's Charter, although it is arguable that it would fall under this. The new definition is also ambiguous regarding the test for indirect abuse and its impact on child custody and care arrangements (www.drewnapier.com/DrewNapier/

[media/DrewNapier/6July2023_Tougher-Laws-to-Protect-Victims-of-Family-Violence-a-step-in-the-right-direction.pdf](#)).

- Division of matrimonial assets involving cryptocurrency and other digital assets remains a largely unknown area of law in Singapore. Difficulties persist in identifying and valuing digital assets due to their great diversity and volatility ([www.businesstimes.com.sg/opinion-features/fighting-over-kids-house-and-now-their-crypto](#)).

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Professional qualifications. LLB (Hons), National University of Singapore, 1989; Singapore Bar, 1990

Areas of practice. Private client; international arbitration; commercial litigation.

Recent transactions/cases:

- Acting in part of a complex, multi-jurisdictional divorce family asset dispute with claims to assets worth USD12 billion, involving a discharge of injunctive relief and asset-freezing orders in conjunction with civil proceedings in Russia, Switzerland and the US and related proceedings.
- A range of notable private client published cases at all levels of the Singapore courts involving complex questions of law, including forum non conveniens, lodgement of caveats, divisibility of gifts and inheritances, international relocation from Singapore, and enforcement of a separation deed.
- Acting as Counsel in CIETAC, UNCITRAL, ICC, SIAC, DIAC and other arbitrations in Singapore and abroad, in India and China.

Languages. English, Chinese

Professional associations/memberships

- Primary Panel Arbitrator, Singapore Institute of Arbitrators.
- Panel Arbitrator and Mediator, Asian International Arbitration Centre.

- Panel Arbitrator, Malaysian Institute of Arbitrators, Shanghai Arbitration Commission, Shanghai International Economic and Trade Arbitration Commission (Shanghai International Arbitration Center), South China International Economic and Trade Arbitration Commission/Shenzhen Court of International Arbitration.
- Arbitrator, Xi'an Arbitration Commission, the Chinese Arbitration Association, Taipei; International Arbitrator, the Russian Arbitration Center of the Institute of Modern Arbitration of the Russian Federation.
- Mediator and Neutral, the Mediation & Conciliation Network.
- Member of the Panel of Neutrals under the Law Society of Singapore Neutral Evaluation and Determination Scheme.
- Fellow, Asian Institute of Alternative Dispute Resolution, Chartered Institute of Arbitrators, Singapore Institute of Arbitrators, Malaysian Institute of Arbitrators, Arbitrators' & Mediators' Institute of New Zealand, Hong Kong Institute of Arbitrators, Indian Council of Arbitration.
- Senior Fellow, Bali International Arbitration & Mediation Center..

Publications

- *Co-author, Singapore chapter of "Chambers Global Practice Guide on Enforcement of Judgments" (2022 and 2023 editions).*
- *Co-author, Singapore chapter of "The Legal 500: Litigation Country Comparative Guide" (4th to 6th Editions, 2021 – 2023).*
- *Co-author, Singapore chapter in "Chambers Global Practice Guide: Litigation" (2023 edition).*
- *Co-Author, chapter entitled "Trusts and Divorce" in "Law & Practice of Family Law in Singapore" (Sweet & Maxwell 1st Edition, 2016 and 2nd Edition, 2022).*
- *Author for updates to Volume 15 on Partnership & Agency in the Halsbury's Laws of Singapore series (LexisNexis, 2022 reissue).*
- *Singapore Chapter in Family Law: A Global Guide From Practical Law (Sweet & Maxwell 5th Ed, 2021 and prior editions).*
- *Co-Author, CCH/SNEF Singapore Employer's Handbook (CCH Asia Pte Ltd) (2006-2008).*

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Professional qualifications. LLB (Hons), University of Manchester, 2008; Graduate Diploma in Singapore Law, National University of Singapore, 2009; Advocate & Solicitor of the Supreme Court of Singapore, 2010

Areas of practice. Private client and family law.

Recent transactions/cases

- Acting for an Australian UHNW client in the negotiation of an International Pre-nuptial Agreement, who owns assets internationally exceeding USD300 million, requiring the coordination of legal advice from UAE law, Australian law, British law, Venezuelan law and Singapore law.
- Acting for a Singaporean UHNW client in divorce proceedings, as well as contested custody proceedings.
- Acting for a PRC UHNW client in potential divorce proceedings involving assets exceeding USD2 billion.
- Acting for an Indian UHNW client in potential divorce proceedings, involving assets exceeding USD1 billion.
- Representing a US client in the negotiation of a pre-nuptial agreement, due to marry into a family owning substantial assets including one of the largest chemical manufacturing companies in China.
- Acted for a Singaporean HNW client in family violence proceedings based solely on psychological abuse committed against two vulnerable teenage children.
- Acted for UHNW PRC client to obtain a worldwide freezing order over assets worth about SGD40 million, to prevent dissipation of matrimonial assets located in England, Australia, China and Singapore.
- Advising a patriarch with a net worth of more than SGD5 billion regarding inter-related family law, private wealth and trust issues for three generations, and setting up various legal agreements and structures to protect the family assets in the event of divorce, mental incapacity or death.
- Represented a father in a long-running High Court case over a minor child.
- Acted for a father in an international relocation matter where the mother had previously abducted the five-year old child to England.

Languages. English, Mandarin

Professional associations/memberships

- Fellow & Governor, International Academy of Family Lawyers.
- Member of:
 - Steering Committee, Cambridge Forums on International HNW Family Law;
 - Law Society of Singapore Family Law Practice Committee;
 - Singapore Institute of Arbitrators;
 - International Academy of Collaborative Professionals;
 - International Society of Therapeutic Justice.
- Accredited Mediator, Singapore Mediation Centre.

- Mediator, Singapore International Mediation Institute.
- Collaborative Family Practitioner.

Publications

- *Co-Author, chapter entitled "Commencement of Arbitration", in "Arbitration in Singapore: A Practical Guide", (Sweet & Maxwell, 2014 ed.)*
- *Contributor to chapter entitled "Trusts and Divorce" in "Law & Practice of Family Law in Singapore" (Sweet & Maxwell, 2022 ed.)*
- *Co-Author, Singapore Chapter in Family Law: A Global Guide From Practical Law (Sweet & Maxwell, 2013, 2015 & 2021 ed.)*
- *Co-Author, Singapore Chapter in "Crypto in Trusts and Foundations" (Globe Publishing, 2024 ed., pending publication)*
- *Co-Author, Chambers High Net Worth guide (Singapore), (Chambers and Partners, 2022 & 2023 ed.)*
- *Co-Author, "Mutual Wills: Till Death Do Us Part?", Singapore Law Gazette, November 2022*
- *Co-Author, "Fighting over the kids, the house and now their crypto", The Business Times, 21 April 2023*

END OF DOCUMENT

RESOURCE HISTORY

Law stated date updated following periodic maintenance..

This document has been reviewed by the author as part of its periodic maintenance to ensure it reflects the current law and market practice on 1 December 2023.

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