

CHILD MAINTENANCE: DISTINGUISHING BETWEEN “REASONABLE EXPENSES” AND “LUXURIES”

[2025] SAL Prac 31

Parents are obliged to provide maintenance for their children. In calculating what is a reasonable amount of maintenance for a child, the question arises of what a reasonable expense is, and what a luxury is. The wealth of the parents is not the determining factor – even if the paying parent can well afford to pay for an item, they will not be required to do so if it is considered a luxury. This article argues that the distinguishing factor between a reasonable expense and a luxury is that the former promotes a child’s mental, emotional and psychological growth, while the latter merely gives a child who already has their basic and reasonable needs met, more ease, comfort, and pleasure.

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I. Introduction

1 The Women’s Charter 1961² (“WC”) requires parents to provide their child with such accommodation, clothing, food and education as may be reasonable, having regard to the parents’

1 The authors are grateful to Mr Jonathan Cheong, Senior Assistant Director of Legal Aid, for his help with this article. However, any errors or omissions are entirely the authors’. The views expressed in this article are the authors’ own, and not representative of the views of the Ministry of Law or the Legal Aid Bureau.

2 2020 Rev Ed.

means and station in life.³ These items are basic needs a child is entitled to under the United Nations Convention on the Rights of the Child.⁴

2 If a parent fails to contribute to the maintenance of a child, the other parent, if she is the child’s caregiver,⁵ can apply for child maintenance pursuant to s 69 of the WC (for married couples) or s 127 of the WC (for divorcing couples). The courts consider, when awarding child maintenance, “all the circumstances of the case”, including: the child’s age; her financial needs; the “standard of living” she enjoyed before the parent failed to provide reasonable maintenance; and the manner in which she was being or expected to be educated and trained.⁶ This means that maintenance awards can vary between children of the same age, based on their family and financial background.

3 However, the courts have established that certain expenses will not be allowed regardless of the family’s financial situation. In *WOS v WOT*,⁷ the court stated:⁸

A child’s reasonable needs are not determined solely by the financial capabilities of its parents. The focus of the enquiry should be on whether the expense itself is needed for each child. Although wealthy parents may indulge their children *beyond what they reasonably need*, they can expend the largesse at their pleasure. The court is only concerned with what a child *in the circumstances reasonably needs*. [emphasis added]

4 This suggests an objective standard for assessing the reasonable needs of children that exist independently from their parents’ wealth.

3 Women’s Charter 1961 (2020 Rev Ed) s 68.

4 United Nations Children’s Fund, “Children’s version of the Convention on the Rights of the Child” Arts 24 and 27–28 <<https://www.unicef.org/child-rights-convention/convention-text-childrens-version>> (accessed 5 September 2025).

5 Women’s Charter 1961 (2020 Rev Ed) s 69(3).

6 Women’s Charter 1961 (2020 Rev Ed) s 69(4).

7 [2023] SGHCF 36.

8 *WOS v WOT* [2023] SGHCF 36 at [50], *per* Choo Han Teck J.

5 This article explores, through reviewing various High Court cases, what reasonable expenses (*ie*, which a parent should provide maintenance for) or luxuries (*ie*, which a parent need not provide maintenance for) are.⁹

II. Reasonable expenses versus luxuries – a value judgment

6 In *VZJ v VZK*,¹⁰ the court opined:¹¹

... parties will often ask the court to order maintenance to be paid in respect of luxuries that the other party does not agree to incur. Whether such luxuries are in the best interests of the child is a matter of parenting views, and the court is not the correct forum to endorse one parenting view over another. In such circumstances, careful consideration must be given when declaring expenses as reasonable, especially when such a declaration would essentially coerce one parent into accepting the other’s parenting approach ...

7 The court said that parties should bear their own expenses when spending beyond the child’s reasonable expenses.¹² This principle was echoed in *XIK v XIL*:¹³

The determination of child maintenance requires a careful balance between meeting the reasonable needs of the children and respecting the boundaries of parental discretion. Maintenance is ordered to cover reasonable expenses of a child. Orders for maintenance sought by a parent beyond this threshold in respect of spending on luxuries that the other parent does not agree to incur will not be granted ...

8 The authors submit that when determining whether expenses for child maintenance are reasonable or luxuries, the courts aim to reflect the views of society. While judges typically do not explain their classifications in detail (or at all), their decisions across different cases have been largely consistent.

9 Where “court” is referred to in this article, unless otherwise stated, it refers to the Family Division of the High Court.

10 [2024] SGHCF 16.

11 *VZJ v VZK* [2024] SGHCF 16 at [71], *per* Mavis Chionh Sze Chyi J.

12 *VZJ v VZK* [2024] SGHCF 16 at [73].

13 [2025] SGHCF 16 at [107], *per* Teh Hwee Hwee J.

III. Reasonable expenses

9 The courts recognise many items as “reasonable expenses”. There is no exhaustive list. The Appellate Division of the High Court in *WRX v WRY*¹⁴ advised against itemising specific expenses.¹⁵ Instead, maintenance orders should follow a broad “budgeting approach”. The parent with care and control can apportion this budget according to the child’s needs.

10 Broadly, the court has approved, for the purpose of assessing child maintenance, expenses necessary to support a child’s (a) survival and physical well-being; (b) education; and (c) social and developmental needs.

A. Survival and physical well-being

11 These include food,¹⁶ shelter, clothing, medical and dental expenses,¹⁷ and personal grooming expenses (*eg*, haircut)¹⁸. Expenses such as food and rent were usually included as part

14 [2024] 1 SLR 851.

15 *WRX v WRY* [2024] 1 SLR 851 at [62].

16 Even within the “food” category, there would be certain foods that the court would not consider reasonable. In *APE v APF* [2015] SGHC 17, *eg*, the court observed at [45]:

I noted that the [mother] was indulging the child in many things which might be nice to have, but were not reasonably necessary for the child’s needs. Examples of these were in the child’s bill for her food which included bird’s nest, snow jelly and cordyceps.

It is submitted that the same rationale can apply to determine which sub-items within an expense are reasonable or luxuries, *ie*, it is a value judgment made by the court, representing what most reasonable people would decide. The judge in *APE v APF* [2015] SGHC 17 did not explain why the particular food items he highlighted were not reasonable. Similarly, there was no explanation for why wines and spirits at S\$80 a month for a 13-year-old child was disallowed in *VNW v VNX* [2021] SGHCF 1 at [140]. The authors submit, however, most reasonable people would agree with the judges in these cases.

17 These include therapeutic interventions. For example, in *XIK v XIL* [2025] SGHCF 16 at [109], the court granted the mother’s claim of S\$315 and S\$44 per month for speech therapy for each of her two sons.

18 *XIK v XIL* [2025] SGHCF 16 at [106]; *WZF v WZG* [2025] 3 SLR 1219 at [116]; *VNW v VNX* [2021] SGHCF 1 at [135]–[140]; *WLE v WLF* [2023] SGHCF 14 at [43]–[45]; *VRJ v VRK* [2024] SGHCF 9 at [31]; *WLI v WLJ* [2023] SGHCF 15 at [27] and [43]–[59].

of the household rather than the child’s personal expenses, however.

B. Education

12 These include school fees, school uniforms, shoes, bags, textbooks, school outings and field trips, devices needed for schoolwork, and school bus or other transport services.¹⁹ Fees for local tertiary education (up to the first tertiary degree)²⁰ are considered a reasonable expense,²¹ though not fees to help the child with university admissions.²²

C. Social and developmental needs

13 The expenses for social and developmental needs include pocket money, books and toys,²³ all kinds of classes and activities, including life skills²⁴ and outdoor education camps.²⁵

19 *XIK v XIL* [2025] SGHCF 16 at [106] and [109]; *WZF v WZG* [2025] 3 SLR 1219 at [108] and [116]; *VNW v VNX* [2021] SGHCF 1 at [135]–[136] and [138]; *WLE v WLF* [2023] SGHCF 14 at [43]; *VRJ v VRK* [2024] SGHCF 9 at [31]; *WLI v WLJ* [2023] SGHCF 15 at [27] and [36]–[41].

20 *WPK v WPJ* [2024] 4 SLR 1198 at [10].

21 In *UMU v UMT* [2019] 3 SLR 504, the court allowed the mother’s claim for the local tertiary education expenses of the 22-year-old child in final year of university, and the polytechnic fees of the 19-year-old child, even though the father only had an earning capacity of S\$2,500 per month and the mother was a homemaker: *UMU v UMT* [2019] 3 SLR 504 at [39]–[40].

22 In *WLE v WLF* [2023] SGHCF 14, the court disallowed the father’s claim for S\$26,782 which he amortised over four years, being the fees for “Crimson Logic Academic Guidance”, to help the daughter with her university admissions: *WLE v WLF* [2023] SGHCF 14 at [45].

23 These were common expenses across a range of cases, *eg*, *XIK v XIL* [2025] SGHCF 16 at [106] and [108]–[110]; *VNW v VNX* [2021] SGHCF 1 at [135] and [139]; *WLI v WLJ* [2023] SGHCF 15 at [27] and *WLE v WLF* [2023] SGHCF 14 at [45]. In this last case, only books were claimed as an expense, as the daughter was of the age to go to university.

24 In *VNW v VNX* [2021] SGHCF 1 (at [138]–[139]), the court allowed the mother’s claim of S\$83.33 per month for “elevate education” which helped her son with his studies and well-being (stress and time management, and motivation, based on Elevate education’s website at <<https://au.elevateeducation.com/programs/senior>> (accessed 5 September 2025).

25 *WZF v WZG* [2025] 3 SLR 1219 at [116]; *VNW v VNX* [2021] SGHCF 1 at [138]–[139]; *VRJ v VRK* [2024] SGHCF 9 at [31].

14 The court’s approach is generally not to make judgments on which class or activity is appropriate for the child but to look at the child’s activities and expenses as a whole, taking into account the circumstances of the family and its finances. See *WZF v WZG*,²⁶ where the court stated that it would be inappropriate for the court to pass judgment on whether a six-year-old should be attending international school, a special reading or performance class, or a martial arts class, as it was not the forum to resolve any conflict in parenting approaches.²⁷ Instead, the court applied the “budgeting approach” in *WRX v WRY* and decided that a sum of S\$1,000 a month for the child’s enrichment would be adequate, without deciding which classes the child should attend.

IV. Luxuries

15 From the cases, it appears that luxuries are expenses beyond a child’s reasonable needs, even when the paying parent could afford to pay for them, and the costs are relatively low. The following expenses were held to be luxuries in the cases reviewed.

26 [2025] 3 SLR 1219.

27 *WZF v WZG* [2025] 3 SLR 1219 at [107].

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A. Holidays

16 In *VZJ v VZK*,²⁸ *WLE v WLF*,²⁹ *WSY v WSX*,³⁰ *WXA v WXB*,³¹ *WZF v WZG*,³² and *XPG v XPH*,³³ the court disallowed holiday expenses as being a luxury despite parties’ high household incomes (S\$18,000 to S\$40,000) and substantial assets (S\$2m to S\$10m).

17 There is one outlier case, namely *VNW v VNX*,³⁴ where the court allowed holiday expenses of S\$550 per month for the two children, stating that “considering the lifestyle that the family had before the divorce, the children ought to be given their annual holiday”.³⁵ While the parties’ income and size of

28 The mother (care and control parent) claimed S\$878.79 per month for holidays and travel for the son from the father (paying parent). The mother was a banker earning a substantial salary (at [63]) and the father was a lawyer (and a director of his own law firm) who failed to disclose his means to court (at [30] and [76]). The matrimonial asset pool was S\$5,181,196.49.

29 [2023] SGHCF 14. The father (care and control parent) claimed S\$166.70 per month for holidays and travel for the daughter from the mother (paying parent). The mother earned S\$7,048 per month while the father took home approximately S\$23,773 to S\$46,805 per month. The matrimonial asset pool was S\$5,441,272.66.

30 [2024] SGHCF 21. The mother (care and control parent) claimed an unspecified amount for holidays with the three children from the father (paying parent). The father earned S\$16,666 per month while the mother earned approximately S\$1,500 per month. The matrimonial asset pool was S\$2,070,521.68.

31 [2024] SGHCF 22. The mother (care and control parent) claimed an unspecified amount for tours for her two children from the father (paying parent). The mother and father earned a monthly salary of S\$29,500 and S\$18,900 respectively. Parties had more than S\$5.2m in matrimonial assets.

32 The mother (care and control parent) claimed S\$200 per month as travel expenses for the child from the father (paying parent). The father declared his monthly income as S\$7,500 but the court disbelieved him. The mother earned S\$14,800 per month and parties had more than S\$10m in matrimonial assets (at [78]). The court disallowed the mother’s claim for travel expenses as it was not a reasonable expense (*ie*, it was a luxury) and held that the party bringing the child on vacation should cover such an expense (see [116]).

33 [2025] SGHCF 45. The mother (care and control parent) unsuccessfully claimed S\$600 per month for holidays, birthday presents and special occasions for the child from the father (paying parent). The mother earned S\$24,828 per month (excluding bonuses) and the father (currently retired) was an investment analyst who earned at least S\$1,021,841 from 2009 to 2013 before retirement. The matrimonial pool was approximately S\$8.6m.

34 [2021] SGHCF 1.

35 *VNW v VNX* [2021] SGHCF 1 at [137], *per* Tan Lee Meng SJ.

the matrimonial asset pool were unclear, the court noted that the father had failed to make full disclosure of his assets to the court. The court ordered the father to pay S\$15,450 per month as reasonable maintenance for the two children (or S\$7,725 per child per month).³⁶ This is significantly higher than the maintenance awarded for the children in *WLE v WLF*,³⁷ *WSY v WSX*,³⁸ *WXA v WXB*,³⁹ and *WZF v WZG*,⁴⁰ where the court ordered approximately S\$583.50 to S\$3,700 per month in child maintenance for each child. The court could have been more generous in assessing the child maintenance in *VNW v VNX* because of the father's failure to make full disclosure of his assets and also his acceptance that the monthly expenses for the elder child should be S\$8,049 and the younger child should be S\$7,373,⁴¹ which was higher than the amounts ordered in the other cases. However, it is submitted that this case is still an outlier (*ie*, not distinguishable), since most of the cases have characterised luxuries (including holidays) as expenses disallowed for the purpose of assessing child maintenance, regardless of the parents' wealth.

B. Birthdays, festivities, and gifts

18 In *VPX v VPY*,⁴² the mother (care and control parent) claimed S\$258 per month for the child's birthday expenses, and S\$1,000 for the child's Christmas gift. The father (paying parent) earned between US\$20,000 and US\$30,000 (approximately between S\$25,784 and S\$38,676) per month while the mother earned S\$7,387 per month. Though the father could afford the

36 *VNW v VNX* [2021] SGHCF 1 at [141].

37 The court determined S\$2,000 per month to be reasonable maintenance for the child: *WLE v WLF* [2023] SGHCF 14 at [45].

38 The court determined S\$1,800 per month to be reasonable maintenance for each of the three: *WSY v WSX* [2024] SGHCF 21 at [107].

39 The court determined S\$1,167 per month to be reasonable maintenance for the two children (or approximately S\$583.50 per child per month), for parties to consult each other on big-ticket purchases (*eg*, school fees, enrichment classes, medical bills and personal insurance) which would be paid on a reimbursement basis and for each party to bear the costs of the children's expenses during their period of access: *WXA v WXB* [2024] SGHCF 22 at [25]–[27].

40 The court determined S\$3,700 to be reasonable maintenance for the child: *WZF v WZG* [2025] 3 SLR 1219 at [116].

41 *VNW v VNX* [2021] SGHCF 1 at [134].

42 [2021] SGHCF 13.

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child’s birthday and Christmas gift expenses, the court held that these were excessive and unnecessary.⁴³ This approach is consistent with *VZJ v VZK*,⁴⁴ *WSY v WSX*,⁴⁵ *XPG v XPH*,⁴⁶ and *WXO v WXP*.⁴⁷ In the first three cases, the paying parent was a high income-earner or had high earning capacity – (a) in the first case, the parent was a lawyer (director of his own law firm) with undisclosed funds; (b) in the second case, the parent earned about S\$16,000 a month; and (c) in the third case, the parent earned more than S\$21,000 a month. The parent in *WXO v WXP* only earned a monthly income of S\$3,000. Hence, although the paying parent in the first three cases could afford the birthday and festivities expenses, the court still disallowed them. Expenses for gifts (as part of an item “Events, gatherings or gifts” at S\$80 a month) were also not allowed in *WZF v WZG*.⁴⁸

C. Overseas education

19 In *WOS v WOT*,⁴⁹ the court held that it was not reasonable for parents (including the wealthy) to be made to pay for an overseas education for their child. This is a luxury which parents can choose to indulge their children in, but they should not be compelled to do so. The court held that the cost to study locally

43 *VPX v VPY* [2021] SGHCF 13 at [18].

44 The mother (care and control parent) claimed S\$212.12 per month for the children’s birthday gifts from the father (paying parent). See n 28 above.

45 The mother (care and control parent) claimed S\$100 per month for the children’s birthday expenses from the father (paying parent). See n 30 above.

46 See n 33 above.

47 [2024] SGHCF 44. The mother (care and control parent) claimed S\$150 per month for the child’s birthday expenses from the father (paying parent). The father and the mother earned S\$3,000 and S\$5,000 per month respectively. The court disallowed the claim for birthday and year-end expenses and held that they were a luxury, considering the income level of both parties.

48 See n 32 above.

49 The mother (care and control parent) claimed the cost of the son’s overseas university education in the UK, which amounted to S\$5,800 per month from the father (paying parent). Although the parties’ respective incomes were unspecified, they had over S\$20m in matrimonial assets. Nevertheless, the court held that the father should not have to pay for this expense. However, as the child had already started studying overseas the court took this into account in assessing a reasonable sum for child maintenance. The mother had claimed S\$5,800.48 a month, but the court awarded S\$4,500 a month, with a view to the child economising his spending. However, the court gave the parents and the child flexibility on how the S\$4,500 would be used.

was more reasonable.⁵⁰ If the child wished to study overseas, the child could either save up money or apply for scholarships, grants, and student loans.⁵¹ In *WPK v WPJ*,⁵² the court considered that the expenses for the two children to study for a postgraduate law degree in the US and a master's degree in the UK respectively were luxuries.⁵³ Since the children were adults, child maintenance was irrelevant. However, the father wanted the mother to help with these postgraduate expenses, by reducing her share of the matrimonial assets, on the basis that she had a duty to maintain the children. The court denied this as the children were expected to fund such postgraduate degrees themselves.⁵⁴

D. Excessive enrichment activities or tuition

20 The authors note that although the court is generally inclined towards allowing enrichment activities and tuition as reasonable expenses, excessive enrichment activities and tuition are considered luxuries. Enrichment activities and tuition are considered excessive when the child is already doing many activities and classes, and more are proposed; or when the child is already doing so many activities and classes that it seems beyond the norm:

(a) In *WLI v WLJ*,⁵⁵ the mother (the care and control parent, a Japanese citizen) proposed that the two children take additional math classes costing S\$815 per month

50 Based on Lionel Loi, “2025 Cost Guide: Singapore Universities’ Tuition Fee Comparison”, *Dollars and Sense* (28 May 2025) <<https://dollarsandsense.sg/cost-guide-singapore-universities-tuition-fee-comparison>> (accessed 5 September 2025), a local university education costs approximately S\$8,250 (for Arts & Social Sciences) to S\$32,200 (for Medicine) per year depending on the course. This is approximately S\$687 to S\$2,683 per month.

51 *WOS v WOT* [2023] SGHCF 36 at [50].

52 [2024] 4 SLR 1198. One son was studying an undergraduate course in the US and wanted to pursue law as a postgraduate degree. The other son had obtained an undergraduate degree from a local university and intended to pursue a postgraduate degree in the UK. The father earned more than S\$20,000 per month. The mother was a homemaker.

53 *WPK v WPJ* [2024] 4 SLR 1198 at [10].

54 *WPK v WPJ* [2024] 4 SLR 1198 at [10]–[11].

55 [2023] SGHCF 15. The father (paying parent) earned approximately S\$96,000 per month as the executive director of a company while the mother (care and control parent) was unemployed.

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(over and above their existing piano, tennis, Japanese, art and mathematics classes costing S\$1,995 per month), and for the father (paying parent) to pay for these expenses. The court allowed the expenses for the existing classes but not the additional classes.

(b) In *XIK v XIL*,⁵⁶ the court allowed the mother to claim for piano classes and occupational and speech therapy at the international school which the two children were attending. However, the court did not allow the claim for the extra classes the mother requested they be enrolled in (*ie*, mathematics and phonics, music, football, rock climbing, swimming lessons and summer school programmes), which would cost S\$3,072 per month for both children.

(c) In *VRJ v VRK*,⁵⁷ the two children were already engaged in drum lessons, camps, guitar, fencing and art classes costing S\$871 per month for both children. However, the mother wanted the children to take more unspecified *ad-hoc* enrichment classes. The court disallowed the claim for this.

(d) In *VZJ v VZK*,⁵⁸ the court disallowed the expenses for tuition, holiday camps or extra-curricular activities costing S\$2,673.51 a month. These were considered luxuries because the child was attending an international school, which cost S\$2,046.97 per month.⁵⁹

(e) In *APE v APF*,⁶⁰ the child was enrolled by the mother for piano, English language, written expression, Chinese language, swimming, gymnastics and mathematics classes. She claimed S\$1,200 per month from the father

56 The father (paying parent) earned at least S\$44,300, and the mother’s (care and control parent) monthly income was about S\$3,000.

57 [2024] SGHCF 9. The father (paying parent) earned a monthly income of S\$19,736 while the mother (care and control parent) earned S\$12,000 a month.

58 See n 28 above.

59 *VZJ v VZK* [2024] SGHCF 16 at [73].

60 [2015] SGHC 17. The father (paying parent) was a commercial pilot while the mother (care and control parent) was a bank officer. Their incomes were not specified in the judgment.

for these. The court found that this “appeared to be extravagant”.⁶¹

21 Generally, the paying parent in these cases was high-earning and could afford the additional enrichment activities and classes. However, in each case, the court found that these were not reasonable expenses but luxuries, based on the activities the child was already engaged in.

E. Leisure, entertainment and dining out

22 The court has generally not been inclined to allow leisure, entertainment and dining out items as reasonable expenses. For example, in *WZF v WZG*, the court held that the dining out expenses of S\$80 per month and leisure or entertainment expenses of S\$80 per month for the children were not reasonable expenses.⁶² The court added that the party who brought the children out for meals, leisure or entertainment should bear those expenses.⁶³ The court in *WXA v WXB*⁶⁴ and *WXO v WXP*⁶⁵ considered family outings a luxury. In *VZJ v VZK*, recreation and entertainment expenses at S\$29.17 a month were allowed. However, expenses for eating out with family and friends were not allowed.⁶⁶ Although family outings were allowed by the court in *WLI v WLJ*, this was probably because parties agreed on this expense (though they disagreed on the quantum of the expense).⁶⁷ In *XIK v XIL*, the court allowed expenses for outings and playdates at S\$200 a month and meals/playdates at S\$200 a month for each of the two children respectively.⁶⁸ However, as with *WLI v WLJ*, the parties had agreed on these expenses, though they disagreed on the quantum.⁶⁹

61 *APE v APF* [2015] SGHC 17 at [45], per Tan Siong Thye J.

62 *WZF v WZG* [2025] 3 SLR 1219 at [116].

63 *WZF v WZG* [2025] 3 SLR 1219 at [117].

64 [2024] SGHCF 22 at [26].

65 [2024] SGHCF 44 at [12].

66 *VZJ v VZK* [2024] SGHCF 16 at [72].

67 *WLI v WLJ* [2023] SGHCF 15 at [42]. The father’s position was S\$200 a month for both children for this expense, and the mother’s position was S\$500. The court decided on S\$200.

68 *XIK v XIL* [2025] SGHCF 16 at [106].

69 The father’s position was S\$200 a month for each child for this expense, and the mother’s position was S\$250. The court decided on S\$200.

V. Unpacking value judgment – comfort versus growth

23 As can be seen from the foregoing, there is consistency between the cases in deciding what reasonable expenses are and what luxuries are. However, as stated earlier, the cases have not explained why something was considered a reasonable expense or a luxury. It is a value judgment, but what is the value which lies behind the judgment?

24 The authors would like to put forward a theory on this, the clues of which can be found in what was said by the learned judges in the cases of *WOS v WOT* and *WZF v WZG*:

(a) “Children should not simply expect their parents to provide for every desire.”⁷⁰

(b) “[T]eaching our children the value of hard work, resilience and managing expectations is just as important as any material gift any of us as parents can provide, for teaching them the ability to navigate life’s challenges (and financial constraints) with grace is often itself a valuable life lesson.”⁷¹

25 The court’s focus is the child’s best interests.⁷² In the child maintenance context, this means providing resources for growth and development rather than fulfilling the child’s every desire. Parents could make their children happy by teaching and guiding them on how to do good instead.⁷³ In any event, a child

70 *WOS v WOT* [2023] SGHCF 36 at [50], per Choo Han Teck J

71 *WZF v WZG* [2025] 3 SLR 1219 at [104], per Mohamed Faizal JC.

72 In *WRX v WRY* [2024] 1 SLR 851, the Appellate Division of the High Court, at [70] held that:

Each party should not focus on calculating every dollar which he or she thinks the other party ought to bear, but must instead extend grace and flexibility to each other for the sake of their children’s welfare. Adopting a calculative mindset is neither productive nor helpful to what must remain the central focus: the best interests of the children.

73 Research by a professor found that adults perceive their children’s happiness to be dependent upon what they want or desire, like toys, shoes and gadgets. However, children as young as four or five years old derive happiness from being or doing good, rather than only having their desires fulfilled: Artemisia Obi MA, “Is It Better for Our Kids to Be Happy or Good?”, *Psychology Today* (7 November 2024) <<https://www.psychologytoday.com/us/blog/cultivating-our-potential/202411/you-want-children-to-be-happy>->
(cont’d on the next page)

should learn to deal with a reasonable level of life's challenges, including financial constraints, and meet them with resilience and equanimity. Thus, the question to ask is whether allowing an expense just gives a child (who already has her basic and reasonable needs met) even more ease, comfort, and pleasure, *versus* encouraging her mental, emotional and psychological growth. If the former, then it is a luxury. If the latter, then it may be a reasonable expense. As the learned judge in *WZF v WZG* pointed out, *not* being allowed an expense could contribute to the child's growth and development even more than allowing it.

26 The categories discussed earlier (holidays, overseas education, birthdays, *etc*) are well established. However, what if this analysis was applied to a different expense? In *WLE v WLF*⁷⁴ and *XPG v XPH*,⁷⁵ expenses for pet food, grooming and veterinary services (as household expenses of which the child had a share) were disallowed when calculating child maintenance. The authors have not reviewed a High Court case where a pet dog is listed as part of a child's personal expenses. However, in the Family Court case of *TEL v TEM*,⁷⁶ the court found that the mother's estimate of the child's current monthly expenses was reasonable, and one of the items was S\$80 per month for the upkeep of a dog belonging to the child. In contrast, in *UXN v UXO*,⁷⁷ the court disallowed S\$40 per month as expenses for a dog to be included in the children's maintenance. It was not stated in the judgment whether the dog belonged to the children or was a family pet.

27 Applying the reasoning above, would the dog contribute to the child's growth and development, or merely her comfort and pleasure? The authors submit that if the dog is the child's

they-want-to-be-good?msockid=09d281674c7c68d93ad394384d7d69ae> (accessed 5 September 2025).

74 [2023] SGHCF 14 at [41].

75 [2025] SGHCF 45 at [71] and Annex 4.

76 [2015] SGFC 86. This case involved variation applications by both parties in respect of a consent order on child maintenance made during the divorce. In her list of expenses, the mother (care and control parent) stated that the child's dog's expenses was S\$195 a month, for grooming, food, and annual checkup and vaccination. The father earned S\$32,090 per month and the mother earned approximately S\$15,000 per month.

77 [2019] SGFC 74 at [41].

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pet, and the child has a close relationship with it,⁷⁸ it would be crucial to the child’s emotional and psychological well-being for that relationship to be preserved (especially if the child is suffering from parental conflict) – and hence the dog’s expenses would be reasonable. On the other hand, if the dog is just a family pet, which the child has played with but never took significant responsibility for or had a particularly close relationship with it, then the dog’s expenses would be a luxury. Pet ownership is becoming common in Singapore over the years,⁷⁹ and hence the authors hope for more clarity on this soon.

28 As the court in *WZF v WZG* observed: “The nature of parenthood is that we all understandably want the best for our children, whether it is providing them with the finest education, the most enriching experiences, or a future full of opportunity.”⁸⁰ However, granting a child every expense representing what is “the best” is not necessarily the same as *doing* the best for that child. It is submitted that in distinguishing between reasonable expenses and luxuries, the court acts in the best interests of the child, by not giving her the best of everything, even if her parents can afford it.

78 Research shows that a pet can help a child develop interpersonal skills. The beneficial effects would be stronger the closer the relationship a child has with the pet: Kelly Oakes, “How Pets Can Give Your Kids a Brain Boost”, *BBC* (14 June 2022) <<https://www.bbc.com/future/article/20220609-dopets-help-childrens-development>> (accessed 5 September 2025).

79 The number of pet dogs and cats has increased significantly over the years: Loraine Lee, “The Big Read: ‘Part of the Family’ – The Rising Status of Pets Among Households and What It Means for Society”, *CNA* (19 June 2023) <<https://www.channelnewsasia.com/today/big-read/pets-part-family-rising-status-big-read-3569031>> (accessed 5 September 2025); Rebecca Ratcliffe, “The Cat in the Flat: Singapore Lifts Ban on Pets in Public Housing”, *The Guardian* (10 June 2024) <<https://www.theguardian.com/world/article/2024/jun/10/the-cat-in-the-flat-singapore-lifts-ban-on-pets-in-public-housing>> (accessed 5 September 2025); Shermaine Ang, “HDB Residents Could Soon Own Up to 2 Cats per Flat as Govt Proposes Lifting 34-Year Ban”, *The Straits Times* (11 November 2024) <<https://www.straitstimes.com/singapore/hdb-residents-could-soon-own-up-to-2-cats-per-flat-from-late-2024>> (accessed 5 September 2025).

80 *WZF v WZG* [2025] 3 SLR 1219 at [104], per Mohamed Faizal JC.