



IN THE CORONERS COURT
OF VICTORIA AT MELBOURNE

COR 2019 006509

FINDING INTO DEATH WITHOUT INQUEST

Form 38 Rule 63(2)

Section 67 of the Coroners Act 2008

Findings of:	Judge John Cain, State Coroner
Deceased:	Bekkie-Rae Curren
Date of birth:	8 April 1991
Date of death:	4 December 2019
Cause of death:	1(a) Blunt head injury
Place of death:	The Royal Melbourne Hospital, 300 Grattan Street, Parkville, Victoria, 3052
Keywords:	Family violence; manslaughter; recent separation; homelessness

INTRODUCTION

1. On 4 December 2019, Bekkie-Rae Curren was 28 years old when she died at the Royal Melbourne Hospital (RMH) from injuries sustained in an assault by her partner, Paul McDonough.
2. Bekkie-Rae is survived by her parents, three brothers, younger sister and her daughter. Her daughter was two years old when she died and was in the care of her mother, Tracey Trinca.
3. Bekkie-Rae was described as being close with her family and would have “*done anything*” for her siblings. She was a skilled dancer and won several dance competitions when she was younger.
4. Bekkie-Rae met Paul in May 2019 through a mutual friend and commenced a relationship. They dated for about five months prior to her passing. Paul was reportedly violent towards Bekkie-Rae throughout their relationship, and she was extremely afraid of him. She disclosed to her friends and support services that Paul monitored her whereabouts and tracked her phone, allegedly physically assaulted her, allegedly strangled her several times and that she would feel forced to have sexual intercourse with him, fearing the repercussions if she declined.
5. Paul had a lengthy criminal record, prior to Bekkie-Rae’s death, which included unlawful assault, recklessly causing injury, intentionally damaging property, recklessly causing serious injury, threat to inflict serious injury and aggravated burglary. Many of his assaults occurred on family members and former partners.
6. In October 2019, Bekkie-Rae disclosed to a friend, Abby Chilcott, that she had recently attended Warrnambool Base Hospital with Paul, and whilst there, he allegedly punched her in the side of the face, causing dark bruising. Abby knew that Bekkie-Rae was fearful of Paul and noted that if they were out in public and Bekkie-Rae saw someone who looked like Paul, she would start running away.

THE CORONIAL INVESTIGATION

7. Bekkie-Rae’s death was reported to the Coroner as it fell within the definition of a reportable death in the *Coroners Act 2008* (the Act). Reportable deaths include deaths that are unexpected, unnatural or violent or result from accident or injury.
8. The role of a coroner is to independently investigate reportable deaths to establish, if possible, identity, medical cause of death, and surrounding circumstances. Surrounding circumstances

are limited to events which are sufficiently proximate and causally related to the death. The purpose of a coronial investigation is to establish the facts, not to cast blame or determine criminal or civil liability.

9. Under the Act, coroners also have the important functions of helping to prevent deaths and promoting public health and safety and the administration of justice through the making of comments or recommendations in appropriate cases about any matter connected to the death under investigation.
10. Victoria Police assigned Detective Leading Senior Constable Scott Riley to be the Coroner's Investigator for the investigation of Bekkie-Rae's death. The Coroner's Investigator conducted inquiries on my behalf, including taking statements from witnesses – such as family, witnesses, the forensic pathologist, and investigating officers – and submitted a coronial brief of evidence.
11. This finding draws on the totality of the coronial investigation into the death of Bekkie-Rae Curren including evidence contained in the coronial brief. Whilst I have reviewed all the material, I will only refer to that which is directly relevant to my findings or necessary for narrative clarity. In the coronial jurisdiction, facts must be established on the balance of probabilities.¹

MATTERS IN RELATION TO WHICH A FINDING MUST, IF POSSIBLE, BE MADE

Identity of the deceased

12. On 2 December 2019, Bekkie-Rae Curren, born 8 April 1991, was visually identified by her mother, Tracey Trinca.
13. Identity is not in dispute and requires no further investigation.

Medical cause of death

14. Forensic Pathologist Dr Linda Iles, from the Victorian Institute of Forensic Medicine (**VIFM**), conducted an autopsy on 5 December 2019 and provided a written report of her findings dated 15 May 2020.

¹ Subject to the principles enunciated in *Briginshaw v Briginshaw* (1938) 60 CLR 336. The effect of this and similar authorities is that coroners should not make adverse findings against, or comments about, individuals unless the evidence provides a comfortable level of satisfaction as to those matters taking into account the consequences of such findings or comments.

15. The post-mortem examination demonstrated features of a left craniectomy, associated residual subdural blood and the sequelae of mass effect from the subdural haemorrhage (areas of infarction involving the cortex, deep ganglionic structures and brainstem). A right orbital blowout fracture was also present. These findings were a consequence of a blunt head injury.
16. In addition to the above, there were patchy thin chronic subdural membranes present which were indicative of past brain trauma. Chronic subdural membranes can be associated with subdural bleeding consequent to minor trauma, or in some instances, without any evidence of blunt trauma. However, in this case, there were bony and skin injuries indicative of significant blunt trauma applied to the head and face.
17. There were also soft tissue bruises to the legs, pelvis, arms, and left side of the chest, lateral left 6th and 7th rib fractures and a right metacarpal fracture. Changes secondary to hospitalisation and ventilation were present in the form of bilateral bronchopneumonia, ischaemic hepatitis and focal pulmonary thromboembolism.
18. Analysis of blood sampled on admission to the Royal Melbourne Hospital did not demonstrate the presence of alcohol. Medications including morphine, diazepam and its metabolite, midazolam, atropine and ketamine were detected, however these were likely administered during emergency medical intervention.
19. Dr Iles provided an opinion that the medical cause of death was *blunt head injury*.
20. I accept Dr Iles' opinion as to the cause of death.

Circumstances in which the death occurred

21. On 4 November 2019, Bekkie-Rae attended The Sexual Assault & Family Violence Centre, locally known as 'Emma House' and spoke with an intake practitioner. Bekkie-Rae disclosed that Paul had hurt her, that she had separated from him about a week earlier and that she had been sleeping on the streets for the past five nights. She told the practitioner that Paul was capable of killing or seriously harming her. The intake practitioner developed a safety plan with Bekkie-Rae and provided her with two nights' accommodation at a safe location. A plan was formulated for Bekkie-Rae to return the following day to see a specialist Domestic and Family Violence Practitioner.

22. Bekkie-Rae returned to Emma House on 5 November 2019 and spoke with a practitioner. She appeared to be drug-affected at the time and her main concern was about trying to regain custody of her daughter, which was being managed by child protection.
23. On 6 November 2019, Bekkie-Rae called Emma House and disclosed to an intake worker that Paul called and threatened her, and that she was scared to leave the safe accommodation until her upcoming appointment with Salvo Connect. An additional night of safe accommodation was organised.
24. On 12 November 2019, Bekkie-Rae reattended Emma House and spoke to an intake worker. She said she needed help, and stated that due to a lack of options, she had started living with Paul again. She reported that he had sexually assaulted her and that she wanted to make a report to police. Before Bekkie-Rae could make a statement, she left Emma House. Bekkie-Rae attended the home of her friend, Abby, who convinced her to return to Emma House. Whilst waiting, Bekkie-Rae told Abby that Paul was going to kill her. Emma House tried to organise for police to attend and take her statement, however they were not able to attend due to resourcing. Police organised for Bekkie-Rae to attend Warrnambool Police Station at 11.00am the following day to make a statement. Emma House provided further accommodation that night at a safe location. Bekkie-Rae unfortunately did not present to the police station to make a statement.
25. On 14 November 2019, Bekkie-Rae called Emma House and spoke to a practitioner. She told the practitioner that she had “*hit panic mode*” about going to the police and that is why she did not make a statement. She failed to attend her appointment with Salvo Connect, because they had advised her to get a caravan and park it at a friend’s house. She reported that she was staying at a friend’s house, that Paul did not know where she was and stated her intention to attend the local police station that afternoon to make a statement. Unfortunately, she did not attend or make a statement.
26. On 19 November 2019, Bekkie-Rae attended Emma House and spoke with a practitioner. She disclosed that she was staying with a friend who was using drugs, and that she was unable to stay there any longer. Ms Wilson referred her to the Brophy Family and Youth Services (**‘Brophy’**), Rough Sleeping Program. Bekkie-Rae attended Brophy the following day and was offered a tent and a sleeping bag, however she explained that she did not have anywhere to put up the tent. Brophy recommended that Bekkie-Rae return to Salvo Connect for housing support or Safe Steps for crisis accommodation.

27. On 22 November 2019, police attended Paul's home, to execute a firearms warrant. Bekkie-Rae was present, and police did not observe any injuries to her at the time. Paul was arrested, charged, and bailed that same day. Police returned Paul to his home later that morning but did not enter the property and were unaware if Bekkie-Rae was there.
28. On 24 November 2019, Bekkie-Rae attended the home of her friend, Michelle Eden. She reported to Michelle that she had recently broken up with Paul. Paul found out that Bekkie-Rae was at Michelle's house and attended at about 11.00pm. Bekkie-Rae told Paul that she did not want to see him and shut the door, however Paul allegedly started kicking the door, "*yelling and screaming*". Bekkie-Rae started searching the house for somewhere to hide.
29. On 25 November 2019, a police officer at Warrnambool Police Station viewed an internal circular of an unknown male who had allegedly stolen a bottle of alcohol from a liquor store in Warrnambool. Senior Constable Barry identified the person in the circular as Paul. When Paul attended Warrnambool Police Station to retrieve the phone that was seized on 22 November 2019, he was arrested in relation to the alleged theft. He was remanded and spent the evening in custody. When Bekkie-Rae learned that Paul was in custody, she decided that that would be a good time to retrieve her belongings from Paul's home.
30. That evening, Bekkie-Rae attended Paul's home and packed her belongings. Two of Paul's friends arrived and were surprised to see Bekkie-Rae there, and she explained the alleged physical abuse that he had perpetrated against her. She told them that she feared Paul would kill her one day and that she was lucky to be alive.
31. On 26 November 2019, Paul was granted bail by a court and left Warrnambool Police Station at about 3.00pm. He returned to his home that afternoon, where neighbours observed Paul and Bekkie-Rae engaged in a physical altercation. The neighbours witnessed Paul chasing Bekkie up the street, then later return to Paul's unit, walking side by side. Bekkie-Rae was limping, her hair was messy, she looked upset, and Paul appeared angry. When the pair approached the walkway in front of the porch, Paul grabbed her, picked her up and threw her through the open door like a "*ragdoll*".
32. Neighbour David Jackaway reported hearing the sound of doors slamming and thuds, as though the walls were being hit with something. This persisted for about 30 minutes. David and two other neighbours approached Paul's unit and knocked on the door. Paul opened the main door but did not open the security door. David asked if everything was okay, however

- Paul told him to “*come back later*”. David and his neighbours did not see Bekkie-Rae as it was dark inside the unit. They called out to her, however, did not receive a response.
33. That evening at about 11.00pm, Paul attended David’s unit and told him to stay out of his business. David told Paul he was worried about Bekkie-Rae as he saw her limping earlier and heard the noises. Paul appeared to become angry during the conversation and was holding an empty glass in his hand. The conversation eventually ended and both men returned to their respective units.
 34. At about 12.30am on 27 November 2019, a neighbour in the street behind Paul’s unit, Jack Fennessy, heard a male and female arguing. He was unsure what the argument was about, but heard “*fucking cunt*” and later, an argument about money. Another resident observed Paul outside their address between 1.30am and 2.00am, walking towards his unit. The resident thought he appeared angry.
 35. At 9.59am, Paul used a payphone located outside the East Warrnambool Fish and Chip Shop at 5 Nicholson Street and called 000. He provided his address and told the call-taker that there was “*a lady that needs help*”. Paramedics arrived at Paul’s address at about 10.15am and located Bekkie-Rae lying supine in the middle of the bed. She was naked and unconscious with significant injuries to her face, head and the backs of her hands.
 36. Paramedics transported Bekkie-Rae to Warrnambool Base Hospital by road for stabilisation. She was airlifted to the Royal Melbourne Hospital (**RMH**) later that day.
 37. At about midday, Paul attended the home of his friend, Ben Knight, in Warrnambool. Ben thought Paul looked “*dazed and spaced out*” and when he asked Paul what was wrong, he reported that he might have “*fucked up*”. Paul reported flashbacks of a pool of blood, putting the shower on Bekkie-Rae and calling an ambulance. Ben suggested that the pair attend the local police station. Ben’s partner, Andrea Brady, drove Ben and Paul to Warrnambool Police Station, via Paul’s parents’ workplace. Paul spoke briefly with his mother and brother, before leaving with Ben and Andrea. Paul spoke with police and was arrested at Warrnambool Police Station that afternoon.
 38. Following her arrival at the RMH, Bekkie-Rae underwent a left trauma craniectomy and evacuation of the subdural haemorrhage with insertion of an extraventricular drain. Her neurological recovery was poor postoperatively. The RMH clinicians held extensive conversations with Bekkie-Rae’s family. The clinical opinion was that Bekkie-Rae had

suffered a non-survivable brain injury, and even if she survived, she would likely be dependent in a high level care nursing home. Active life supports were withdrawn, and Bekkie-Rae passed away on 4 December 2019.

Criminal investigation and prosecution

39. Following his arrest, Paul participated in an interview but largely remained mute. He consented to participate in a physical examination, where a medical officer observed abrasions to Paul's fingers, bruises to his right thigh and linear scratch abrasions to the left index finger and right side of the neck.
40. Paul was initially charged with murder, however later pleaded guilty to manslaughter. He was sentenced to 11 years and six months' imprisonment.

FURTHER INVESTIGATIONS AND CPU REVIEW

41. The relationship between Bekkie-Rae and Paul met the definition of 'family member' as defined in the *Family Violence Protection Act 2008 (Vic) (FVPA)*. As Bekkie-Rae's death occurred in circumstances where there was a reported history of family violence, I requested that the Coroner's Prevention Unit (CPU)² examine the circumstances of her death as part of the Victorian Systemic Review of Family Violence Deaths (VSRFVD).³

Emma House

42. Bekkie-Rae first engaged with Emma House on 15 May 2019, requesting housing support, but did not disclose violence on that occasion. She re-engaged with Emma House on 30 September 2019, however the service was unable to contact her.
43. When Bekkie-Rae spoke to Emma House on 4 November 2019, she disclosed extensive and serious violence perpetrated by Paul. She did not give Paul's real name and said that anything she told Emma House would "*just...increase her risk*". Emma House assessed her as being at

² The Coroners Prevention Unit (CPU) was established in 2008 to strengthen the prevention role of the coroner. The unit assists the Coroner with research in matters related to public health and safety and in relation to the formulation of prevention recommendations. The CPU also reviews medical care and treatment in cases referred by the coroner. The CPU is comprised of health professionals with training in a range of areas including medicine, nursing, public health and mental health.

³ The VSRFVD provides assistance to Victorian Coroners to examine the circumstances in which family violence deaths occur. In addition the VSRFVD collects and analyses information on family violence-related deaths. Together this information assists with the identification of systemic prevention-focused recommendations aimed at reducing the incidence of family violence in the Victorian Community.

‘elevated risk’, and gave her two nights’ accommodation in a motel, material aid, and she was allocated to a case manager.

44. The CPU noted that Emma House was proactive in referring Bekkie-Rae to housing services, provided temporary accommodation and the contact details for Safe Steps. The CPU noted other funding options such as Flexible Support Packages that may have been available for Bekkie-Rae, however given that she was only briefly engaged with Emma House, there may have been insufficient time to explore these options.

South West Healthcare

45. In September 2019, Paul was an inpatient at South West Healthcare for an unrelated health issue. During this admission, notes indicated that Paul had a fight with a girlfriend, where items were thrown around his room and he was noted to be running down the hallway. The girlfriend was not named, however Bekkie-Rae confided in a friend that she had been assaulted by Paul at hospital. It therefore seems likely that it was Bekkie-Rae who was present in September 2019.
46. The CPU noted that Paul’s medical records indicated that he had previously presented for mental health issues, and that staff were aware that he had a history of violence, with family members reportedly fearful of him.
47. The CPU also noted the Royal Commission into Family Violence (**RCFV**), which recognised:

Health professionals are in a unique position to identify and respond to family violence. Some victims of family violence will not contemplate engaging with a specialist family violence service but will interact with health professionals at times of heightened risk for family violence – for example, during pregnancy or following childbirth – or seek treatment for injuries or medical conditions arising from violence they have experienced. Failing to identify signs of family violence or minimising disclosures by patients can have a profound impact on victims and deter them from seeking help in the future.

48. In response to the RCFV, the Victorian Government introduced legislation that prescribes a range of organisations, including hospitals, to comply with the Multi-Agency Risk Assessment and Management (**MARAM**) framework and information sharing schemes. Public hospitals became prescribed agencies in 2018 and were required to be ready to respond to family violence under the MARAM framework by early 2021.

49. Given the significant reforms that hospitals have been required to undertake, to improve their response to family violence since Bekkie-Rae's death, the CPU FV team did not suggest that any further investigation is required on this issue. I accept their advice.

Victoria Police

50. The CPU noted that on 22 November 2019, when police attended Paul's address to execute the firearms warrant, attending members were aware that Bekkie-Rae might be present and that there were concerns for her welfare.
51. During their attendance, a female police officer spoke with Bekkie-Rae outside of the property and asked about her welfare, noting that Emma House was worried about her. Bekkie-Rae was apprehensive, anxious and told police she was unsure why Emma House was worried about her. She told police that Paul had not assaulted her and denied any violence. Police encouraged Bekkie-Rae to return to Emma House and offered to help her do so if she wished. They also provided Bekkie-Rae with their details, and developed a 'cover story', so that her discussion with police did not arouse Paul's suspicion.
52. The CPU opined that the police members engaged well with Bekkie-Rae during this incident and took appropriate steps to try and engage her with support services. The CPU concluded that the police response was in-line with best practice. The CPU did not identify any opportunities for intervention or prevention on this occasion.

Housing

53. The CPU noted that Bekkie-Rae's main contacts with support services related to her need for housing. Over the five to six months prior to her death, she was provided accommodation in a motel, and was offered a tent and sleeping bag. On another occasion, a support service suggested that Bekkie-Rae could rent a caravan and park it at a friend's house.
54. The CPU did not criticise the housing services in relation to these interactions and noted that resourcing limitations and housing availability have a significant impact on these services' ability to assist clients with housing. In 2022, the Australian Institute of Health and Welfare (AIHW) reported that Victorian specialist housing support services were unable to assist 96 clients each day, and that 70% of cases were closed without the client having accessed stable housing.

55. Family violence is the main reason why women and children leave their homes in Australia and is the primary reason women present for assistance at homelessness services. The AIHW *Specialist Homelessness Services Annual Report 2022-23* indicated that 38% of clients who presented to a specialist homelessness service had experienced family violence and that of those 104,000 clients, 66% cited family violence as the primary reason for requiring housing support.
56. Demand for crisis accommodation for women escaping violence is unable to be met by Victoria's current number of designated crisis accommodation beds, resulting in housing and family violence services utilising motels and offering other ad-hoc accommodation arrangements such as tents to house victim-survivors.
57. In a bid to address this issue, the Victorian Government announced an investment of \$25 million as part of the Family Violence Housing Blitz package in 2016. This funding would be used to support construction of 180 new units of crisis accommodation and upgrades to existing accommodation. In 2019-20 and 2020-21, the Victorian Government provided an additional \$4.07 million to enable the Safe Steps statewide service to place more victim-survivors in crisis accommodation and cover associated motel costs.
58. In 2024, the Victorian Government advised that by 2025, there will be a total of 35 family violence refuges across Victoria with a capacity to support about 197 households. In addition to State funding, the 2022-23 Federal Budget committed \$100 million over five years to the Safe Places initiative, to fund an additional 720 'safe places' across Australia.
59. The CPU noted that it was unclear whether this projected supply meets the current or forecasted demand, however data from Homes Victoria indicates that Specialist Family Violence Services were unable to provide emergency accommodation to 101 of 743 households in June 2021 and as of May 2024, Safe Steps reported that they were still reliant on motel accommodation to house clients fleeing family violence.

Housing reforms in Victoria

60. Between 2015 and 2021, there was a 135% increase in victim-survivors of family violence not being provided with long-term housing when attending homelessness services.⁴ In April

⁴ Council of Homeless Persons, 'New data highlights desperate housing crisis for women fleeing family violence in Victoria', (Web Page, 1 September 2022), < <https://chp.org.au/article/new-data-highlights-desperate-housing-crisis-forwomen-fleeing-family-violence-in-victoria/>>.

2022, the Department of Families, Fairness and Housing (DFFH) reported that since 2016 they have:

- a) Acquired 325 social housing dwellings and leased 401 medium-term tenancies from the sector.
 - b) Prioritised family violence victim-survivors and their families for social housing through the Victorian Housing Register.
 - c) Provided more than 6,500 flexible support packages each year to help victim-survivors of family violence.
 - d) Provided 38 new and leased properties across regional Victoria, providing women and children a safe and secure environment in which to live.
61. A further 1000 'safe homes' for victim-survivors of family violence will also be delivered as part of the Victorian Government's Big Housing Build.
62. The CPU noted that whilst these initiatives will assist in reducing the number of victim-survivors facing homelessness, in March 2023 there were 58,131 families on the waiting list for public housing, with 31,158 of these families on the priority list. This includes people escaping family violence, experiencing homelessness, people with disabilities and people with special housing needs. As such, the demand for social housing significantly outstrips projected supply.
63. The 2023 *Parliamentary Inquiry into Rental and Housing Affordability Crisis* in Victoria reaffirmed that the figure proposed by the Big Housing Build falls well below demand and calculated 60,000 social housing units were required to meet current demand. The 2024-2034 Victorian Government's *Victoria's Housing Statement* promised to invest in more social housing, however the Victorian Government did not set targets for how this would be achieved, and the recent State Budget reportedly fails to create the necessary conditions for strong and sustained growth in the construction of new social housing at the necessary scale.

Income support

64. Bekkie-Rae was receiving income support as her only source of income in the lead up to her passing. The increased demand for social housing is compounded by rapidly increasing private rental costs and the comparatively low rate of Australia's welfare payments, with the Poverty and Inequality Partnership highlighting the low rate of income support payments as

being a key driver of poverty in Australia. In their Report into Economic Security and Intimate Partner Violence, Australia's National Research Organisation for Women's Safety (ANROWS) recommended an urgent review of social security payments available to victim survivors, noting that the current rates of payment are significantly below the poverty line and create additional barriers to victim survivor's ability to establish secure housing and recover from family violence.⁵

65. The Federal Government's *Economic Inclusion Advisory Committee 2024 Report* reiterated these findings and emphasised the financial stress that those receiving Centrelink payments were under.⁶ This committee recommended that the Federal Government increase in JobSeeker payments by \$17 a day,⁷ with other reviews urging the Government to increase income support payments to the same rate as the pension.⁸ The Sex Discrimination Commissioner emphasized the importance of increasing these payments for improving the economic security of women in violent relationships, highlighting the capacity this would give women to leave violent relationships, preventing further violence and, in some instances, homicide.⁹

Recommendations

66. Given the impact of housing and income support on victim-survivors of family violence, the CPU made the following suggestions for possible recommendations:
- a) In line with the recommendations of the *Economic Inclusion Advisory Committee 2024 Report*, the Commonwealth Government should review rates for Australian income support payments, with a particular focus on the needs of women and children experiencing family violence.
 - b) That the Victorian Government implement the outstanding recommendations outlined by the *Legal and Social Issues Committee Inquiry into Homelessness in Victoria* and commit to investing in the establishment of adequate crisis accommodation to meet

⁵ ANROWS Economic security and intimate partner violence: Research synthesis.

⁶ Economic Inclusion Advisory Committee, '2024 Report to Government', (PDF), <https://www.dss.gov.au/sites/default/files/documents/04_2024/13404-eiac-report-dv-08.pdf>.

⁷ Australian Broadcasting Corporation, 'Raise Jobseeker by \$17 a day, advisory committee tells government', (26 April, 2024), < <https://www.abc.net.au/news/2024-04-26/raise-jobseeker-17-a-day-advisory-committee-tellsgovernment/103773198>>.

⁸ Australian Council of Social Services, "'It's not enough": why more is needed to lift people out of poverty', (PDF, September 2023), 5.

⁹ Australian Broadcasting Corporation – Listen, 'Sex Discrimination Commissioner calls for jobseeker increase', (Radio, broadcast 6 May 2024), <https://www.abc.net.au/listen/programs/radionational-breakfast/sex-discrimination-commissionercalls-for-jobseeker-increase-103808040>.

projected demands for victim survivors and perpetrators of family violence who leave or are removed from their home.

- c) That the Victorian Government implement the recommendations outlined by the *Inquiry into the rental and housing affordability crisis in Victoria*, with special consideration given to building 60,000 new public housing dwellings by 2034, in line with projected demands.
- d) That the Victorian Government consider alternative ways of expanding social housing stock in Victoria, such as exploring incentives for landlords to lease their property at affordable rates.
- e) That the Victorian Government consider reserving a portion of public housing stock for perpetrators of family violence who have been removed from the family home, with the aim of increasing the safety of women and their children.
- f) That the Victorian Government, in line with recommendations outlined by *The rental and housing affordability crisis in Victoria* and the *Legal and Social Issues Committee Inquiry into Homelessness in Victoria*, include the right to housing in the Victorian *Charter of Human Rights and Responsibilities Act 2006* (Vic).

67. I accept and adopt the CPU's proposed recommendations.

FINDINGS AND CONCLUSION

68. Pursuant to section 67(1) of the *Coroners Act 2008* I make the following findings:

- a) the identity of the deceased was Bekkie-Rae Curren, born 8 April 1991;
- b) the death occurred on 4 December 2019 at The Royal Melbourne Hospital, 300 Grattan Street, Parkville, Victoria, 3052, from *blunt head injury*; and
- c) the death occurred in the circumstances described above.

RECOMMENDATIONS

Pursuant to section 72(2) of the Act, I make the following recommendations:

- a) In line with the recommendations of the *Economic Inclusion Advisory Committee 2024 Report*, the Commonwealth Government should review rates for Australian

income support payments, with a particular focus on the needs of women and children experiencing family violence.

- b) That the Victorian Government implement the outstanding recommendations outlined by the *Legal and Social Issues Committee Inquiry into Homelessness in Victoria* and commit to investing in the establishment of adequate crisis accommodation to meet projected demands for victim survivors and perpetrators of family violence who leave or are removed from their home.
- c) That the Victorian Government implement the recommendations outlined by the *Inquiry into the rental and housing affordability crisis in Victoria*, with special consideration given to building 60,000 new public housing dwellings by 2034, in line with projected demands.
- d) That the Victorian Government consider alternative ways of expanding social housing stock in Victoria, such as exploring incentives for landlords to lease their property at affordable rates.
- e) That the Victorian Government consider reserving a portion of public housing stock for perpetrators of family violence who have been removed from the family home, with the aim of increasing the safety of women and their children.
- f) That the Victorian Government, in line with recommendations outlined by *The rental and housing affordability crisis in Victoria* and the *Legal and Social Issues Committee Inquiry into Homelessness in Victoria*, include the right to housing in the Victorian *Charter of Human Rights and Responsibilities Act 2006 (Vic)*.

I convey my sincere condolences to Bekkie-Rae's family for their loss.

Pursuant to section 73(1B) of the Act, I order that this finding be published on the Coroners Court of Victoria website in accordance with the rules.

I direct that a copy of this finding be provided to the following:

Darren Curren, Senior Next of Kin

Tracey Trinca, Senior Next of Kin

The Sexual Assault & Family Violence Centre (also known as Emma House)

Scott Trinca

South West Healthcare

Royal Melbourne Hospital

Victorian Government

Commonwealth Government

Detective Leading Senior Constable Scott Riley, Coroner's Investigator

Signature:



Judge John Cain
State Coroner
Date : 14 October 2024

NOTE: Under section 83 of the *Coroners Act 2008* ('the Act'), a person with sufficient interest in an investigation may appeal to the Trial Division of the Supreme Court against the findings of a coroner in respect of a death after an investigation. An appeal must be made within 6 months after the day on which the determination is made, unless the Supreme Court grants leave to appeal out of time under section 86 of the Act.
