



Form 20 – Affidavit



Industrial Relations Act 2016, s 989

Industrial Relations (Tribunals) Rules 2011, r 52, r 53, r 55

Information

- This form is to be used to prepare an Affidavit.
- Please read this form carefully and complete all relevant sections. Information that is missing or non-compliant with the relevant section of an Act or the Rules may result in the non-acceptance of your form.
- Documents which are longer than 30 pages in length must be provided to the Industrial Registry in hard copy before it will be accepted for filing.
- For further information please refer to the website www.qirc.qld.gov.au or contact the Industrial Registry on 1300 592 987 or via email at qirc.registry@qirc.qld.gov.au.

Instructions

- Affidavits must comply with the formal requirements for documents in accordance with rules 50 to 57 of the *Industrial Relations (Tribunals) Rules 2011*.
- The affidavit must set out the facts divided into consecutively numbered paragraphs. Each paragraph should be confined to a distinct part of the subject matter.
- This affidavit must be sworn or affirmed before a person authorised by law to witness the swearing of affidavits (e.g. Justice of the Peace, Commissioner for Declarations, Lawyer).
- Each page must be signed by the deponent (person making the affidavit) and the witness (person taking the affidavit).
- ***Attach extra page(s) if you need more space, ensuring that Part 5 containing the signature is always on the last page of the form and that each additional page is signed at the bottom of the page by the deponent and witness.***
- Any handwritten alteration to the affidavit must be initialled by the deponent and witness.
- If this affidavit contains exhibits (document mentioned in the affidavit and used with the affidavit) you will need to complete a **Form 21 - Certificate of Exhibit to Affidavit** for each exhibit (which is also to be signed and witnessed).
- If the affidavit is sworn by a person incapable of reading the affidavit or physically incapable of signing it, the witness must complete the Certificate at Part 6.
- If required by the Court, Commission or Registrar, the deponent must appear to give evidence or for cross-examination.
- The Court, Commission or Registrar may remove or strike out any material contained within the affidavit deemed to be a scandalous or oppressive matter.

Signed:

[Signature of the deponent/substitute signatory]

Taken by:

[Signature of witness]
Lawyer

1. Matter details

Applicant:	Queensland Council of Unions and Anor
	v
Respondent:	State of Queensland (Office of Industrial Relations)

If there are more than two parties to the application, please complete a **Form 1 – Parties list** and file with this form.

This affidavit is filed for the:	<input type="checkbox"/> Applicant/Appellant	<input checked="" type="checkbox"/> Respondent (or as the case may be)
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2. Contact details of party filing this affidavit

Title [please select]:	<input type="checkbox"/> Mr	<input type="checkbox"/> Mrs	<input checked="" type="checkbox"/> Ms	<input type="checkbox"/> Miss	<input type="checkbox"/> Mx	<input type="checkbox"/> Other: _____
Name of Party:	State of Queensland (Office of Industrial Relations)					
Name of contact person: [if party is an organisation]	Emma Bristow					
Postal/Service address:	1 William Street					
	Suburb/Town Brisbane				Postcode 4000	
Phone number:	3406 9843		Mobile number:	0400 247 213		
Email address:	Emma.Bristow@oir.qld.gov.au					

3. Deponent's details (person making the affidavit)

Title [please select]:	<input checked="" type="checkbox"/> Mr	<input type="checkbox"/> Mrs	<input type="checkbox"/> Ms	<input type="checkbox"/> Miss	<input type="checkbox"/> Mx	<input type="checkbox"/> Other: _____
Deponent's Name:	Shane Donovan					
Postal/Service address*:	1 William Street					
	Suburb/Town Brisbane				Postcode 4000	

* The deponent does not have to give a residential address if they are concerned about their safety. They may give another address at which they are satisfied they will receive documents e.g. a business address.

Signed: 
[Signature of the deponent/substitute signatory]

Taken by: 
Justice of the Peace/Commissioner for Declarations/Lawyer

4. Evidence

Attach extra pages if you need more space ensuring that Part 5 containing the signature is always on the last page of the form and that each additional page is signed at the bottom of the page by the deponent and witness.

Affidavit

I, Shane Victor John Donovan, of 1 William Street Brisbane
[insert full name of deponent] [insert residential or business address of deponent*]

☐

state on oath:

OR

☒

do solemnly and sincerely affirm and declare, that:

Insert matters to be sworn or affirmed in numbered paragraphs.

1. I am Shane Victor John Donovan.
2. I am currently the acting Executive Director, Industrial Relations, Office of Industrial Relations (OIR).
3. I have been in this position since 29 April 2025. My substantive position is Senior Director, Industrial Relations Public Sector, OIR. I commenced that position in around July 2019.
4. The Industrial Relations Division of OIR has responsibility for delivering the Queensland Government's ambition and priorities for industrial relations, through effective regulatory, policy and public sector frameworks that empower fairness for workers, workforces and workplaces in Queensland industry and public sector.
5. The Division has responsibility for:
 - a. the development, implementation and review of industrial relations and related legislation, and providing policy advice on state and national industrial relations matters;
 - b. administration and enforcement functions associated with the Industrial Relations Act 2016 (Qld) (IR Act) and the State of Queensland (State)'s other industrial relations related legislation, including the Labour Hire Licensing Act 2017; and
 - c. advising Government as an employer on industrial relations matters specific to the Queensland public sector as well as Government Owned Corporations.
6. In my substantive role within the Industrial Relations Public Sector team our role is to provide advice to Government as an employer, including representation in the State's industrial relations tribunal, public sector bargaining services to public sector entities and Government Owned Corporations and industrial relations capability building across the Queensland public sector.

Signed:

[Signature of the deponent/substitute signatory]

Taken by:

[Signature of witness]
Lawyer

Evidence

Use this extra page if you need more space in the affidavit ensuring that Part 5 containing the signature is always on the last page of the form and that each additional page is signed at the bottom of the page by the deponent and witness.

7. Prior to this I have been in senior Employee / Industrial Relations/Human Resources roles across a number of agencies within the Queensland public sector, including Health, Corrections, Ambulance and Fire and Police (with the Public Safety Business Agency). I have been part of negotiations for a number of certified agreements across the public sector including directly participating in, or advising on, six arbitrations of agreements across the public sector (Corrections, Fire, Ambulance, Core, Child Safety/Youth Justice and Education).

The proceedings

8. I understand that the Applicants are seeking a General Ruling to:
- increase the Queensland Minimum Wage by 3.5%; and
 - increase the wages or salaries prescribed by all state awards by a wage adjustment of 3.5%; and
 - increase existing allowances in all state awards which relate to work or conditions which have not changed in service increments by 3.5%; and
 - have an operative date of 1 September 2025 for the increases.
9. This effectively seeks an outcome consistent with that determined by the Fair Work Commission as part of the Annual Wage Review 2025 (AWR).
10. My understanding is that the Fair Work Commission determined that outcome, despite it being higher than inflationary guides, on the basis that it represented an opportunity to restore the real value of modern award wages.
11. In response to the applications made by QCU and TQ, and taking into consideration the industrial context in Queensland, the State of Queensland (State) seeks:
- A fair and reasonable increase to the Queensland Minimum Wage;
 - A fair and reasonable increase to all State award rates of pay and allowances which relate to work or conditions which have not changed in service increments; and
 - An operative date of 1 September 2025.
12. In determining this position, the State has taken into account the present industrial context and seeks to ensure competitive wages and adequate protections for the few workers in this jurisdiction who do not receive the benefits associated with regular enterprise bargaining.

The ind [redacted] Queensland

Signed: [redacted]

[Signature of the deponent/substitute signatory]

Taken by: [redacted]

Lawyer

[Signature of witness]


13. It is my experience that the IR Act provides the foundational legislative framework for the conduct of industrial relations within Queensland's industrial relations jurisdiction.
14. Queensland's industrial relations jurisdiction is limited to those employers and employees who are not national system employers or employees. To put it more simply in the context of wages setting though, this would generally mean employers and employees of the Queensland Government and Local Government, as well as some small statutory bodies such as the Darling-Downs Moreton Rabbit Board and Parents and Citizens Associations.
15. The industrial framework in Queensland provides for a system of employment conditions which includes:
- the Queensland Employment Standards;
 - Awards; and
 - Certified Agreements.
16. During the majority of my career as an industrial relations practitioner, bargaining has been a key feature of the jurisdiction, occurring as a regular process every three or four years. It has represented an opportunity to regularly review terms and conditions to ensure they remain fit for purpose and allowed parties to negotiate improvements in conditions above the Award. As an example, the Skill Infrastructure Delivery and Maintenance Allowance of \$45 per fortnight appears in the *Queensland Health Building, Engineering and Maintenance Services Certified Agreement (No. 8) 2022*; the *Transport and Main Roads Operational Employees' Certified Agreement 2022*; and the *QBuild Field Staff Certified Agreement 2022*. This allowance does not appear in the underpinning *Building Engineering and Maintenance Services Award – State 2016* or the *Civil Construction, Operations and Maintenance General Award – State 2016*.

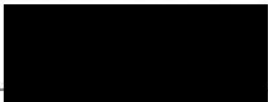
Workers in the national jurisdiction

17. Following a series of referrals by the States, including Queensland, the majority of workers in Australia are employed under the *Fair Work Act 2009*.

Wage setting mechanisms

18. I have read the AWR and note that the Fair Work Commission:
- proceeded on the basis that the number of NMW-reliant employees is very small and the NMW has very limited practical effect (see paragraph 15); and
 - indicates that 20.7% of all employees in that jurisdiction are modern award reliant (see paragraph 21).
19. I understand a Statistical Report was prepared by the Fair Work Commission for the AWR. SD-1 is an excerpt from that report featuring chart 7.1. My understanding of chart 7.1 is that an estimated:

Signature 
[Signature of the deponent/substitute signatory]

Taken by: 
[Signature of witness]
Lawyer

- a. 34.0 percent of workers have their pay set through collective agreements; and
 - b. 23.2 percent of workers have their pay set through awards; and
 - c. 38.7 percent of workers have their pay set through individual arrangements; and
 - d. 4.1 percent of workers are the owner manager of an incorporated enterprise.
20. In considering the information from these two sources, it seems fair to say that approximately 20 – 23 percent of national system workers have their wages set through awards; whereas a slightly higher number of workers have their pay set through agreements and the majority have their pay set through individual arrangements.
21. In reviewing data gathered for the Fair Work Commission, the AWR sets out characteristics relating to the 10 most common modern awards, applying to the most modern award reliant employees, as listed below (see Table 2 in paragraph 18):
 - a. *General Retail Industry Award 2020;*
 - b. *Social, Community, Home Care and Disability Services Industry Award 2010;*
 - c. *Hospitality Industry (General) Award 2020;*
 - d. *Fast Food Industry Award 2020;*
 - e. *Restaurant Industry Award 2020;*
 - f. *Children's Services Award 2010;*
 - g. *Health Professionals and Support Services Award 2020;*
 - h. *Building and Construction General On-site Award 2020;*
 - i. *Cleaning Services Award 2020;*
 - j. *Clerks—Private Sector Award 2020.*
22. I note that the Fair Work Commission identified that such employees:
 - a. are more likely to work part-time and around half of all award reliant employees are engaged on a casual basis;
 - b. are predominantly female;
 - c. are predominantly employed in accommodation and food services, retail, healthcare, social assistance, administrative and support services industries; and
 - d. over one third are low paid, and that 56.9 percent of all low paid employees are modern award reliant.
23. My understanding is also that Federal modern award reliant employees:
 - a. tend to earn less when compared with workers who have their pay set by other methods (such as enterprise bargaining and individual arrangements);
 - b. cannot be covered by an award if they have a guarantee of annual earnings in excess of \$183,100 per annum; and

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[Signature of the deponent/substitute signatory]

Taken by: _____

Lawyer

[Signature of witness]

c. will not have an award apply to them in circumstances where an operative enterprise agreement applies to them.

24. I note that at paragraph 124 of the AWR the Fair Work Commission identifies that there has been a significant increase in the number of employees covered by enterprise agreements, notwithstanding that the number of enterprise agreements has not increased by a proportionate amount. They also identify at paragraph 125 that, for the period December 2014 to December 2024, the number of employees covered by current agreements reached its highest point in December 2024, namely 2,624,500 employees (see Table 15).
25. While the number of employees covered by an agreement may be increasing, my understanding in reviewing Table 7.1 of the AWR Statistical Report (SD-1) is that the proportionate number of employees covered by an agreement has declined over the period 2014 to 2023 from 41.1 percent to 34.0 percent. I also note that the number of current enterprise agreements has declined over the period December 2014 to December 2024 (see Table 15).
26. This data generally accords with my understanding that, for a variety of reasons, the process of negotiating replacement agreements occurs less regularly in the national system when compared with the Queensland system.

'Low paid' workers

27. I am aware that as part of the Annual Wage Review the Fair Work Commission considers the needs of 'low paid' workers. I understand that they have referred to two benchmarks for the low paid threshold, noting a final acceptable definition has not been determined for this year, which are as follows (see paragraph 91):
- a. Based on Australian Bureau of Statistics (ABS) data on the Characteristics of Employment data from August 2024 that the benchmark is \$1,139.65 per week which is equivalent to \$59,261.80 per annum.
 - b. Based on ABS Employee Earnings and Hours data from May 2023, the benchmark is \$1131.33 per week which is equivalent to \$58,829.16 per annum.
28. I understand that 35.6% of all modern award reliant employees were assessed as falling within the low paid category as part of the AWR (see Table 1 in paragraph 16).

Australian private sector gender equality

29. I have reviewed the Workplace Gender Equality Agency Employer Data Explorer report for the Australian Private Sector for 2023-24 dated 18 July 2025. SD-2 is a copy of that report. It provides that for the Australian Private Sector:
- a. The average total remuneration gender pay gap is 21.8%.

Signed: _____

[Signature of the deponent/substitute signatory]

Taken by: _____

Lawyer

[Signature of witness]

- b. The average base salary gender pay gap is 16.7%.

Commonwealth public service

30. I have reviewed the Workplace Gender Equality Agency Employer Data Explorer report for the Commonwealth Public Sector for 2023-24 dated 18 July 2025. **SD-3** is a copy of that report. This report provides that for the Commonwealth public service:
- a. The average total remuneration gender pay gap is 6.4%.
- b. The average base salary gender pay gap is 2.8%.
31. I have reviewed an excerpt from the Commonwealth Government's *State of the Service Report 2023-24* regarding workforce size and distribution. **SD-4** is a copy of that excerpt. The excerpt identifies that at 30 June 2024 the Australian public service employed 185,343 workers. My understanding is that this number does not represent a majority of the employees in the national system given the AWR identifies the number of modern award reliant workers is about 2.61 million.

Victorian public service

32. I understand the Victorian Government published a State of the Sector Report 2024 in April 2025. Amongst other things, it provides that:
- a. The Victorian public sector has an average gender pay gap of 18.1% and the Victorian public service has an average gender pay gap of 6.7%. **SD-5** is an excerpt of the data that informed that report to this effect which is available on the Victorian Public Sector Commission's website (<https://www.vpsc.vic.gov.au/workforce-data-state-of-the-public-sector/employee-and-executive-pay-leave-and-work-arrangements/employee-pay-and-gender-pay/> accessed 18 July 2025).
- b. The number of Victorian public service workers at June 2024 was 382,823 people. **SD-6** is an excerpt of the data that informed that report to this effect which is available on the Victorian Public Sector Commission's website (<https://www.vpsc.vic.gov.au/workforce-data-state-of-the-public-sector/employee-and-executive-numbers/number-of-employees/> accessed 18 July 2025).
33. My understanding is that the Victorian government does not employ a majority of workers in the national system given the AWR identifies the number of modern award reliant workers is about 2.61 million.

Workers in the Queensland jurisdiction

34. I understand the Queensland jurisdiction consists of approximately 370,000 workers, comprised of:

Signed: _____

[Signature of the deponent/substitute signatory]

Taken by: _____

Lawyer

[Signature of witness]

- a. 322,600 workers in the Queensland state public sector (as estimated by the Public Sector Commission);
- b. 44,849 workers in the Local Government Sector (as estimated by the Local Government Association of Queensland); and
- c. A small number of workers employed in statutory bodies such as the Parents and Citizens Association and the Darling Downs-Moreton Rabbit Board.

Wage setting mechanisms

35. I understand the majority of workers in this jurisdiction are covered by both an award and a certified agreement. The most recent estimate I am aware of was 98.2% coverage as part of the 2023 State Wage Case proceedings. In the Queensland public sector coverage rates are slightly higher at an estimated 99% based on Public Sector Commission data at the March quarter 2025.
36. I understand based on Public Sector Commission data that there are 1,895 public sector workers who are entirely award reliant (as estimated by the Public Service Commission) and 2,732 local government workers who are entirely award reliant (as estimated by the Local Government Association of Queensland.)
37. In preparation for this proceeding I caused enquiries to be made as to the number of employees currently employed by the Darling Downs Rabbit Board and understand the Darling Downs-Moreton Rabbit Board currently employs 14 staff covered by the *General Employees (Queensland Government Departments) and Other Employees Award – State 2015*.
38. I understand there are 7,922 Queensland public sector employees covered by State awards whose base wages are in excess of \$183,100 per annum. These workers may also be covered by a certified agreement which provides higher wages. This can be contrasted with workers in the national jurisdiction who cannot be covered by an award where they earn in excess of \$183,100 per annum.
39. It is my experience that, because of the role of collective bargaining in the Queensland jurisdiction, as well as other features of the system including conciliation, arbitration and award rates, employees and their union representatives are able to regularly review and reset wages and conditions to ensure they are contemporary.
40. Examples of this are the two cost of living response mechanisms that have formed part of recent State Government wages policy offerings, which are intended to ensure that where inflationary pressures exceed guaranteed wage increases. In the first iteration, employees were able to access relief initially as a lump sum top up payment in addition to wage increases: see for example clause 2.2 of the State Government Entities Certified Agreement 2023. In the most recent iteration as part of the wages policy, a top up wage increase is available for each year of a replacement agreement in addition to the guaranteed wage increases.

Signed: _____

[Signature of the deponent/substitute signatory]

Taken by: _____

Lawyer.

[Signature of witness]

'Low paid' workers

41. At the other end of the scale, my understanding is that there are very few adult employees in Queensland under either awards or certified agreements who receive a full time equivalent annual salary that is less than the low paid threshold metrics adopted by the Fair Work Commission (discussed at paragraph 24 above). In the Queensland public sector, as at 30 March 2025, 2,718 employees received a rate of pay less than \$58,829.16 per annum. That is a very small cohort out of the total 322,600 Queensland public sector workers and can be contrasted with the significantly higher rate of low paid workers in the national jurisdiction.

Gender equality

42. I have reviewed the *Queensland public sector Gender pay equity dashboard 2024*. A copy of this dashboard is SD-7. This dashboard provides that the average gender pay gap based on earnings is 5.94%.

Current industrial context in the Queensland public sector

43. A very small group of workers in the Queensland jurisdiction do not participate in enterprise bargaining and solely benefit from increases to award wages or the Queensland Minimum Wage. These workers are directly impacted by the State Wage Case. In the Queensland public sector this is estimated to be a group of 1,895 workers who are award-reliant.
44. The Queensland public sector employs the majority of workers in the Queensland jurisdiction (322,600 out of approximately 370,000 workers).
45. The majority of Queensland public sector workers are covered by 35 certified agreements which are regularly negotiated – currently every three years. In 2025, 25 agreements expire, and in 2026 a further ten will expire.
46. The 35 current agreements in force, negotiated under the wages policy for the last round of enterprise bargaining, provide for:
- a wage increase in year 1 of the agreement of 4% payable on the higher of the award or agreement rate at the operative date of the agreement;
 - a wage increase in year 2 of the agreement of 4% payable on the preceding year's agreement rate;
 - a wage increase in year 3 of the agreement of 3% payable on the preceding year's agreement rate;
 - up to three Cost of Living Adjustment (COLA) payments available in each of the three agreement years;

Signed: _____
[Signature of the deponent/substitute signatory]

Taken by: _____
[Signature of witness]
Lawyer

e. a range of other allowances.

47. As part of the process of negotiating replacement agreements in 2025, the Government reviewed its public sector wages policy in light of current circumstances and its commitments to the people of Queensland to ensure the Government is an employer of choice and respects taxpayers' money.

48. The current public sector wages policy was explained in a recent letter to the Queensland Council of Unions, a copy of which is **SD-8**. The current policy provides for wage increases consisting of:

- a. for year 1, a 3% guaranteed wage increase payable on the higher of the award or agreement rate at the nominal expiry date of the current agreement and an additional a CPI Uplift Adjustment (CUA) of up to a further 0.5% where through the year March quarter Brisbane CPI exceeds the 3% guaranteed increase.
- b. for years 2 and 3, a 2.5% guaranteed wage increase each year and an additional CUA available in each year providing additional increases of up to 1% where the March quarter Brisbane CPI exceeds the 2.5% guaranteed wage increase.

49. As part of the current industrial context in the Queensland public sector there are particular provisions contained in certified agreements and *Minister Assisting the Premier Directive 12/12: State Wage Case and Certified Agreements (Directive 12/12)* which provide for the award rate to be payable where it exceeds the certified agreement rate. These clauses appear in 31 of the 35 agreements currently operating in the sector: see for example clause 2.11 of the *State Government Entities Certified Agreement 2023*. An analysis of public sector agreements containing the clause is **SD-9**. A copy of Directive 12/12 is **SD-10**.

50. My understanding is that if the Commission were to apply an increase of 3.5% to all modern award wages and relevant allowances, this would have two effects:

- a. it would directly benefit those workers who do not receive the benefit of collective bargaining and are either reliant on an award or the Queensland Minimum Wage for wage increases; and
- b. it would indirectly impact workers who participate in collective bargaining in up to 29 certified agreements in the State public sector. An analysis of the impacts on public sector agreements is **SD-11**.

51. In terms of the impacts on those workers participating in collective bargaining, my view is that this impact is unavoidable given the current industrial context. These workers regularly review their wages and conditions and receive a range of benefits that are more favourable than those

Signed: _____

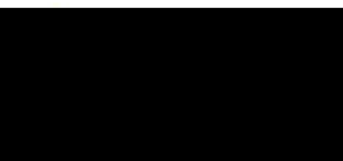
[Signature of the deponent/substitute signatory]

Taken by: _____

Lawyer

contained in awards, unlike the core beneficiaries of the State Wage Case who do not receive any of the benefits of collective bargaining.

Signed: _____



[Signature of the deponent/substitute signatory]

Taken by: _____



Lawyer

5. Signature

The contents of this affidavit are true and correct. Where the contents of this affidavit are based on information and belief, the contents are true to the best of my knowledge and I have stated the source of that information and the grounds for the belief and, if contained in a document, I have attached that document to this affidavit.

I understand that it is a criminal offence to provide a false matter in an affidavit, for example, the offence of perjury under section 123 of the Criminal Code.

I state that: [Deponent to complete – **only tick if applicable** – leave blank if not applicable]:

☐

This affidavit was made in the form of an electronic document

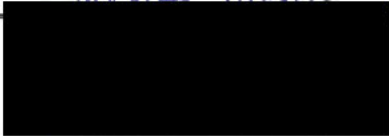
☐

I electronically signed this affidavit

☐


This affidavit was made, signed and witnessed under Part 6A (Audio visual link) of the *Oaths Act 1867*.

SWORN/AFFIRMED BY:

Signature of person making the affidavit	
Full name of deponent:	Shane Victor John Donovan
Signature of deponent:	
Sworn/Affirmed at [place]:	1 William Street Brisbane.
Date:	25 July 2025

Alternative signature panel if substitute signatory signs	
Complete this section <u>only</u> if the affidavit was signed by a substitute signatory (a person directed to sign the affidavit on behalf of the deponent)	
Signed for and at the direction of the deponent by:	
Full name of substitute signatory:	
Signature of substitute signatory:	
Sworn/Affirmed at [place]:	
Date:	

BEFORE ME:

Witness details	
Full name of witness:	Phoebe Lee Everingham
Signature and type of witness:	 <input type="checkbox"/> Justice of the Peace <input type="checkbox"/> Commissioner for Declarations <input checked="" type="checkbox"/> Lawyer
Date:	25/7/2025
Insert name of law practice/place of employment:	Crown Law, State of Queensland

6. Certificate (pursuant to rule 55 of the *Industrial Relations (Tribunals) Rules 2011*):

WITNESS to complete [only tick if applicable]

If deponent is incapable of reading or physically signing the affidavit

- ☐ I certify that this affidavit was read in the presence of the deponent who seemed to understand it, and signified that they made the affidavit.
- ☐ I certify that this affidavit was read in the presence of the deponent who seemed to understand it, and signified that they made the affidavit, but was physically incapable of signing it.
- ☐ A substitute signatory signed for and at the direction of the deponent.

7. For Special Witnesses (see s 12 of the *Oaths Act 1867*)

SPECIAL WITNESS to complete [only tick if applicable]

For special witnesses only:

- ☐ I am a special witness under the *Oaths Act 1867* (see s 12 of the *Oaths Act 1867*).
- ☐ This affidavit was made in the form of an electronic document.
- ☐ I electronically signed this affidavit.
- ☐ This affidavit was made, signed and witnessed under Part 6A (Audio visual link) of the *Oaths Act 1867* - I understand the requirements for witnessing a document by audio visual link and have complied with those requirements.

Signed: _____

[Signature of the deponent/substitute signatory]

Taken by: _____

Lawyer



Form 21 – Certificate of Exhibit to Affidavit

Industrial Relations Act 2016, s 989

Industrial Relations (Tribunals) Rules 2011, r 53

Information

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Matter details

Applicant:	Queensland Council of Unions and Anor
	v
Respondent:	State of Queensland (Office of Industrial Relations)

Exhibit details

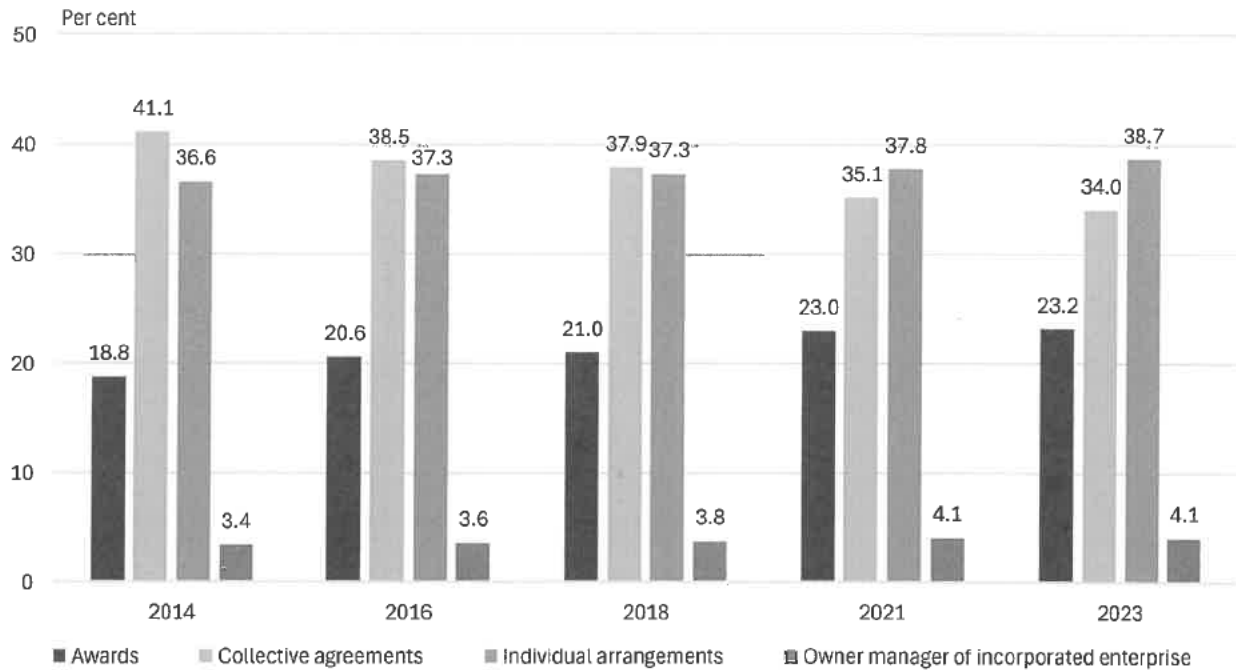
Name of document:	Chart 7.1 AWR Statistical Report
Marked:	SD-1
Mentioned in the affidavit of:	Shane Victor John Donovan

Signature

Full name of deponent/ substitute signatory:	Shane Victor John Donovan		
Signature of deponent/ substitute signatory:			
Full name of witness:	Phoebe Lee Everingham		
Signature and type of witness:			
	<input type="checkbox"/> Justice of the Peace	<input type="checkbox"/> Commissioner for Declarations	<input checked="" type="checkbox"/> Lawyer
Sworn/Affirmed at [place]:	1 William Street Brisbane		
Date:	26/7/2025		

7. Award reliance

Chart 7.1: Method of setting pay



Note: Awards refers to the proportion of employees in an industry that are paid the award rate and are not paid more than that rate of pay. Estimates of the proportion of employees on awards and collective agreements in 2016 have been revised on the basis of the 2018 conceptual treatment of these methods of payment.

Source: ABS, 'A Guide to Understanding Employee Earnings and Hours Statistics', Feature Article, in *Employee Earnings and Hours, Australia*, May 2018; ABS, *Employee Earnings and Hours, Australia*, various.



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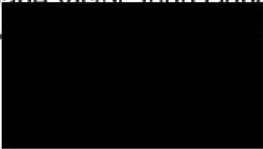
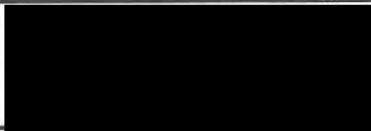
Matter details


Applicant:	Queensland Council of Unions and Anor
	v
Respondent:	State of Queensland (Office of Industrial Relations)

Exhibit details

Name of document:	WGEA Employer Data Explorer: Australian Private Sector
Marked:	SD-2
Mentioned in the affidavit of:	Shane Victor John Donovan

Signature

Full name of deponent/ substitute signatory:	Shane Victor John Donovan
Signature of deponent/ substitute signatory:	
Full name of witness:	Phoebe Lee Everingham
Signature and type of witness:	 <input type="checkbox"/> Justice of the Peace <input type="checkbox"/> Commissioner for Declarations <input checked="" type="checkbox"/> Lawyer
Sworn/Affirmed at [place]:	1 William Street Brisbane
Date:	25/7/2025


Employer Data Explorer
 Reporting year: 2023 - 24

Date updated: 18-07-2025

Navigation
 Select to visit each page

Workforce Composition
 Board / Governing Body
 Equal Remuneration and Gender Pay Gap
 Flexible Work and Employee Support
 Employee Consultation
 Sex Based Harassment and Discrimination
 Compare Employer (ABN) Data

Dashboard filters
 Filter employers by the following

Reporting Year: All
 Employer name (ABN): Australian Private Sector
 Sector: All
 Corporate group: All
 Industry division: All
 Industry class: All
 Employer size: All

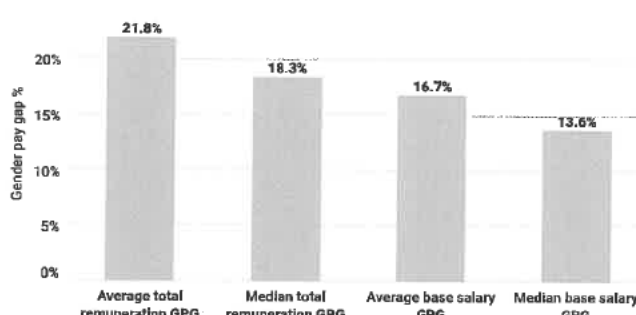
Ensure that an employer is selected after updating filters

National
Australian Private Sector
 ABN: 0000 | Employer size: -
 Industry division: -
 Industry class: -

Total employees: 5,155,750
 Women: 2,640,538 (51%)
 Men: 2,515,212 (49%)

Gender Equality Indicator 3:
Equal remuneration and gender pay gap

Australian Private Sector gender pay gap



Gender composition by pay quartile
 Women | Men

	Women	Men	Average total remuneration
Total workforce	51%	49%	\$116,000
Upper quartile	35%	65%	\$215,000
Upper middle quartile	53%	47%	\$111,000
Lower middle quartile	58%	42%	\$80,000
Lower quartile	59%	41%	\$58,000

Average total remuneration rounded to the nearest \$1,000

Optional Employer Statement
 Disclaimer

Formal policy/strategy on equal remuneration between women and men

Yes	71%	✓
No	29%	✗

Equal remuneration policy/strategy inclusions
 Responded 'Yes' to having a policy/strategy on equal remuneration between women and men (multiple choice)

To achieve gender pay equity	61%
To close the gender pay gap	45%
To ensure no gender bias occurs at any point in the remuneration review process (for example at commencement, at annual salary reviews, out-of-cycle pay reviews, and performance reviews)	86%
To be transparent about pay scales and/or salary bands	39%
To ensure managers are held accountable for pay equity outcomes	38%
To implement and/or maintain a transparent and rigorous performance assessment process	62%

Conducted a gender pay gap analysis

Yes	68%	✓
No	32%	✗

Most recent gender gap analysis conducted

Within the last 12 months	90%
Within the last 1-2 years	8%
More than 2 years ago but less than 4 years ago	1%

Type of gender pay gap analysis undertaken

A like-for-like gap analysis which compares the same or similar roles of equal or comparable value	77%
An overall gender pay gap analysis which compares the difference between women's and men's average pay and composition across the whole organisation	62%
A by-level gap analysis which compares the difference between women's and men's average pay within the same employee category	52%

Actions taken as a result of the gender pay gap analysis
 Responded 'Yes' to conducting a gender pay gap and took action as result (multiple choice)

Analysed commencement salaries by gender to ensure there are no pay gaps	38%
Analysed performance pay to ensure there is no gender bias (including unconscious bias)	48%
Analysed performance ratings to ensure there is no gender bias (including unconscious bias)	40%
Conducted a gender-based job evaluation process	7%
Corrected instances of unequal pay	52%
Created a pay equity strategy or action plan	30%
Identified cause/s of the gaps	67%
Reported pay equity metrics (including gender pay gaps) externally	25%
Reported pay equity metrics (including gender pay gaps) to all employees	31%
Reported pay equity metrics (including gender pay gaps) to the executive	62%
Reported pay equity metrics (including gender pay gaps) to the governing body	52%
Reviewed remuneration decision-making processes	54%
Set targets to reduce any gender pay gaps	17%
Trained people-managers in addressing gender bias (including unconscious bias)	31%



Form 21 – Certificate of Exhibit to Affidavit

Industrial Relations Act 2016, s 989

Industrial Relations (Tribunals) Rules 2011, r 53

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Matter details


Applicant:	Queensland Council of Unions and Anor
	v
Respondent:	State of Queensland

Exhibit details

Name of document:	WGEA data explorer: Commonwealth public service
Marked:	SD-3
Mentioned in the affidavit of:	Shane Victor John Donovan

Signature

Full name of deponent/ substitute signatory:	Shane Victor John Donovan		
Signature of deponent/ substitute signatory:			
Full name of witness:	Phoebe Lee Everingham		
Signature and type of witness:			
	<input type="checkbox"/> Justice of the Peace	<input type="checkbox"/> Commissioner for Declarations	<input checked="" type="checkbox"/> Lawyer
Sworn/Affirmed at [place]:	1 William Street, Brisbane		
Date:	25/7/2025		


Employer Data Explorer
 Reporting year: 2023 - 24

Date updated
18-07-2025

Navigation
 Select to visit each page

Workforce Composition
 Board / Governing Body
 Equal Remuneration and Gender Pay Gap
 Flexible Work and Employee Support
 Employee Consultation
 Sex Based Harassment and Discrimination
 Compare Employer (ABN) Data

Dashboard filters
 Filter employers by the following

Reporting Year
All

Employer name (ABN)
Commonwealth Public Sector

Sector
All

Corporate group
All

Industry division
All

Industry class
All

Employer size
All

Ensure that an employer is selected after updating filters

National
Commonwealth Public Sector
 ARN: 0001 | Employer size: -
 Industry division: X - Commonwealth Public Sector
 Industry class: Commonwealth Public Sector

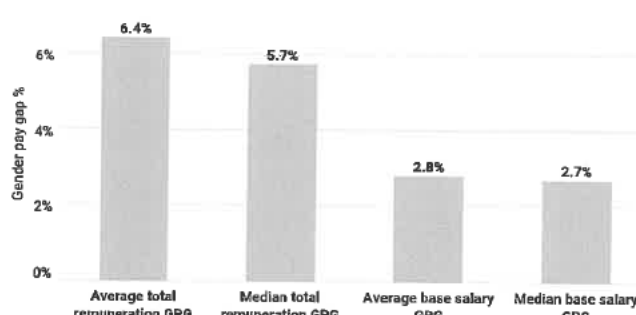
Total employees
240,365

Women
131,952 (55%)

Men
108,413 (45%)

Gender Equality Indicator 3:
Equal remuneration and gender pay gap

Commonwealth Public Sector gender pay gap



Category	Gender pay gap %
Average total remuneration GPG	6.4%
Median total remuneration GPG	5.7%
Average base salary GPG	2.8%
Median base salary GPG	2.7%

Gender composition by pay quartile
 Women | Men

	Women	Men	Average total remuneration
Total workforce	54%	46%	\$124,000
Upper quartile	47%	53%	\$189,000
Upper middle quartile	56%	44%	\$126,000
Lower middle quartile	60%	40%	\$100,000
Lower quartile	54%	46%	\$78,000

Average total remuneration rounded to the nearest \$1,000

Optional Employer Statement
 Disclaimer

Formal policy/strategy on equal remuneration between women and men

Yes	42%	✓
No	58%	✗

Equal remuneration policy/strategy inclusions
 Responded 'Yes' to having a policy/strategy on equal remuneration between women and men (multiple choice)

To achieve gender pay equity	37%
To close the gender pay gap	20%
To ensure no gender bias occurs at any point in the remuneration review process (for example at commencement, at annual salary reviews, out-of-cycle pay reviews, and performance reviews)	69%
To be transparent about pay scales and/or salary bands	67%
To ensure managers are held accountable for pay equity outcomes	16%
To implement and/or maintain a transparent and rigorous performance assessment process	67%

Conducted a gender pay gap analysis

Yes	72%	✓
No	28%	✗

Most recent gender gap analysis conducted

Within the last 12 months	76%
More than 2 years ago but less than 4 years ago	5%
Within the last 1-2 years	17%

Type of gender pay gap analysis undertaken

An overall gender pay gap analysis which compares the difference between women's and men's average pay and composition across the whole organisation	85%
A by-level gap analysis which compares the difference between women's and men's average pay within the same employee category	60%
A like-for-like gap analysis which compares the same or similar roles of equal or comparable value	40%

Actions taken as a result of the gender pay gap analysis
 Responded 'Yes' to conducting a gender pay gap and took action as result (multiple choice)

Analysed commencement salaries by gender to ensure there are no pay gaps	18%
Analysed performance pay to ensure there is no gender bias (including unconscious bias)	18%
Analysed performance ratings to ensure there is no gender bias (including unconscious bias)	21%
Conducted a gender-based job evaluation process	2%
Corrected instances of unequal pay	23%
Created a pay equity strategy or action plan	11%
Identified cause/s of the gaps	58%
Reported pay equity metrics (including gender pay gaps) externally	30%
Reported pay equity metrics (including gender pay gaps) to all employees	30%
Reported pay equity metrics (including gender pay gaps) to the executive	64%
Reported pay equity metrics (including gender pay gaps) to the governing body	56%
Reviewed remuneration decision-making processes	15%
Set targets to reduce any gender pay gaps	9%
Trained people-managers in addressing gender bias (including unconscious bias)	21%



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Matter details

Applicant:	Queensland Council of Unions and Anor
	v
Respondent:	State of Queensland

Exhibit details

Name of document:	Excerpt from Commonwealth Government's state of the service report
Marked:	SD-4
Mentioned in the affidavit of:	Shane Victor John Donovan

Signature

Full name of deponent/ substitute signatory:	Shane Victor John Donovan		
Signature of deponent/ substitute signatory:			
Full name of witness:	Phoebe Lee Everingham		
Signature and type of witness:			
	<input type="checkbox"/> Justice of the Peace	<input type="checkbox"/> Commissioner for Declarations	<input checked="" type="checkbox"/> Lawyer
Sworn/Affirmed at [place]:	1 William Street, Brisbane		
Date:	25/7/2025		

Workforce size and distribution

The Australian Public Service workforce spans 583 locations across Australia in 101 agencies.

At 30 June 2024, the APS had 185,343 employees, working across 234 job roles in fields such as service delivery, research, regulation, project management and policy development.

The size of the APS relative to the population it serves, and to the wider labour force, has changed over time. Table 9 shows APS headcount in the context of the Australian population size, and the Australian labour force, over time.

Table 9: APS headcount as a proportion of Australian population and Australian labour force, over time

	June 2008	June 2012	June 2016	June 2020	June 2024
APS employees	159,299	167,343	155,607	150,360	185,343
Australian population	21,249,200	22,733,500	24,190,900	25,649,200	27,095,255
APS employees as % of population	0.75%	0.74%	0.64%	0.59%	0.68%
Employed persons	10,487,557	10,958,923	11,507,887	11,733,447	13,647,452
APS employees as % of employed persons	1.52%	1.53%	1.35%	1.28%	1.36%

Sources:

1. APSED
2. Estimated Residential Population (Australian Bureau of Statistics), [National, state and territory population](#), Series: A2133251W, [Population and components of change - national](#). The June 2024 estimate is a population projection figure: 'High Series' (Australian Bureau of Statistics (2022-base—2071), [Population Projections Australia](#))
3. Labour Force, Australia, (Australian Bureau of Statistics), [Labour Force, Australia](#), Series: A84425129C ([Labour force status for 15-64 year olds by Sex - Trend, Seasonally adjusted](#)).

At 30 June 2024, the proportion of APS employees located in Victoria, Queensland, South Australia and Western Australia was higher, while the proportion located in the Australian Capital Territory, New South Wales, the Northern Territory and Tasmania was lower than a decade earlier (Table 10).



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Matter details

Applicant:	Queensland Council of Unions and Anor
	v
Respondent:	State of Queensland

Exhibit details

Name of document:	Excerpt from Victorian Public Sector State of the Sector Report - gender equity
Marked:	SD-6 SD-5 [REDACTED]
Mentioned in the affidavit of:	Shane Victor John Donovan

Signature

Full name of deponent/ substitute signatory:	Shane Victor John Donovan
Signature of deponent/ substitute signatory:	[REDACTED]
Full name of witness:	Phoebe Lee Everingham
Signature and type of witness:	[REDACTED]
	<input type="checkbox"/> Justice of the Peace <input type="checkbox"/> Commissioner for Declarations <input checked="" type="checkbox"/> Lawyer
Sworn/Affirmed at [place]:	1 William Street, Brisbane
Date:	25/7/2025

Number of employers and employees 2024

Employee numbers over time, 2020 to 2024

Data sets, key terms and how we prepare data

SD-5
SD-6

Handwritten signatures and initials.

Key facts

Workforce figures

- 382,823 people employed or 314,629 FTE in the overall Victorian public sector at June 2024
- 9.8% of the Victorian labour force
- 262 public sector employers
- 4.1% (12,450 FTE) rise in total employment between June 2023 and June 2024.

Breakdown of the overall Victorian public sector workforce:

- 57,345 people (54,839 FTE) were employed in the Victorian Public Service (VPS) of which 40,972 (39,085 FTE) are employed by a VPS department.
- 325,478 people (259,791 FTE) were employed in public entities.

Examples of public entities include public health services, government schools, TAFEs, police and emergency services, water and land management bodies and other statutory authorities and state-owned corporations.

Changes in employment

Changes in employment are primarily due to increases in public health care, government schools, transport and water corporations.

Changes in ongoing and fixed-term employment from June 2023 to June 2024:

- Ongoing employment rose by 9.0% (from 236,686 FTE to 258,057 FTE)
- Fixed-term employment fell by 14.9% (from 55,097 FTE to 46,870 FTE).

Changes in ongoing and fixed-term employment may partially be from the Victorian Government's 2023/24 Budget reprioritisation process.

Rises in employment

Overall employment rises:

- 0.1% (78 FTE) rise in the Victorian Public Service (VPS)
- 5.0% (12,372 FTE) rise in public entities
- 4.1% (12,450 FTE) rise in the public sector workforce.

There was a small rise in FTE in the VPS but overall headcount fell by 41 employees.

Rises in employment by sector:

- 7% (7,563 FTE) rise in public healthcare
- 4.9% (3,710 FTE) rise in government schools



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Matter details

Applicant:	Queensland Council of Unions and Anor
	v
Respondent:	State of Queensland

Exhibit details

Name of document:	Excerpt from Victorian Public Sector State of the Sector Report - workforce size
Marked:	SD-5 506 [REDACTED]
Mentioned in the affidavit of:	Shane Victor John Donovan

Signature

Full name of deponent/ substitute signatory:	Shane Victor John Donovan
Signature of deponent/ substitute signatory:	[REDACTED]
Full name of witness:	Phoebe Lee Everingham
Signature and type of witness:	[REDACTED]
	<input type="checkbox"/> Justice of the Peace <input type="checkbox"/> Commissioner for Declarations <input checked="" type="checkbox"/> Lawyer
Sworn/Affirmed at [place]:	1 William Street, Brisbane
Date:	25/7/2025

Employee pay

Pay by gender and the gender pay gap

Data sets, key terms and how we prepare data

SD-5

SD-6

HA. PB

Key facts

Overall public sector workforce

At June 2024, for non-casual public sector employees (including executives) the:

- median salary is \$97,243
- mean (average) gender pay gap is 18.1% or \$22,358 (compared to 18.0% or \$21,773 in 2023)
- median gender pay gap is 10.1% or \$10,681 (compared to 10.0% or \$10,534 in 2023).

The gender pay gap favours men across most occupations and increases with age.

Overall, while more women are employed in each pay group, a higher proportion of men are in the higher pay groups compared to women.

Victorian Public Service (VPS)

At June 2024, for non-casual VPS employees (including executives) the:

- median salary is \$106,059
- mean (average) gender pay gap is 6.7% or \$8,028 (compared to 6.5% or \$7,747 in 2023)
- median gender pay gap has reduced to 0% (compared to 1.8% or \$1,914 in 2023).

The mean gender pay gap in the VPS is driven by a higher proportion of men in the higher pay groups compared to women.

Gender pay gap by industry

The median gender pay gap varies by industry group.

In 2024, the median gender pay gaps were:

- 14.9% for TAFE and other education industries (up from 13.7% in 2023)
- 13.5% for creative industries, finance, transport and other industries (up from 13.0% in 2023)
- 10.3% for government schools (unchanged from 2023)
- 6.1% for public health care (down from 6.7% in 2023)
- 3.4% for water and land management (down from 4.8% in 2023)
- 2.9% for police and emergency services (up from 1.3% in 2023)
- 0.0% for the Victorian public service (down from 1.8% in 2023).



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Matter details

Applicant:	Queensland Council of Unions and Anor
	v
Respondent:	State of Queensland (Office of Industrial Relations)

Exhibit details

Name of document:	Queensland Public Sector Gender Pay Equity Dashboard
Marked:	SD-7
Mentioned in the affidavit of:	Shane Victor John Donovan

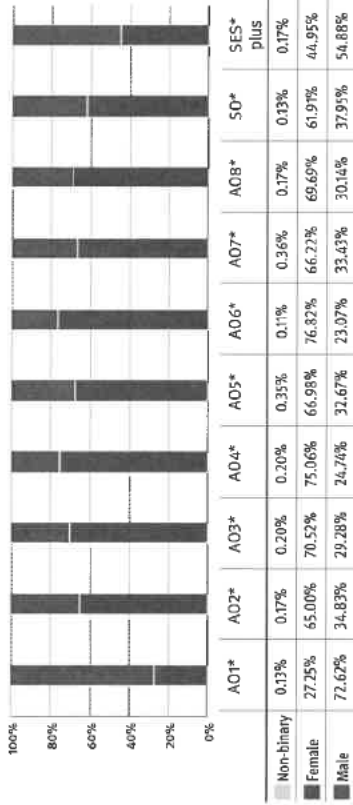
Signature

Full name of deponent/ substitute signatory:	Shane Victor John Donovan
Signature of deponent/ substitute signatory:	
Full name of witness:	Phoebe Lee Everingham
Signature and type of witness:	 <input type="checkbox"/> Justice of the Peace <input type="checkbox"/> Commissioner for Declarations <input checked="" type="checkbox"/> Lawyer
Sworn/Affirmed at [place]:	1 William Street Brisbane
Date:	25/7/2025

The Queensland public sector pay gap continues to narrow in the year to June 2024. For more information, you can read our report [here](#).

Gender disparity across levels^{1,2,3}

Percentage of total headcount – June 2024.



Women in leadership¹



two thirds of public sector employees are women, similar to 2022 & 2023



women in leadership roles at SO, SES and CE levels, being an increase from 53.70% in 2023

Executive recruitment^{4,5}

Women comprise around one-third of applicants, with the proportion approaching 40% for 2024. However, women comprise around 60% of successful appointments.



The gender superannuation gap has improved slightly from 26.14% in 2023 to 25.46% in 2024.⁹

% of women in agencies¹

There is significant variation in the gender profile of agencies.

Highest

78.55%

Education

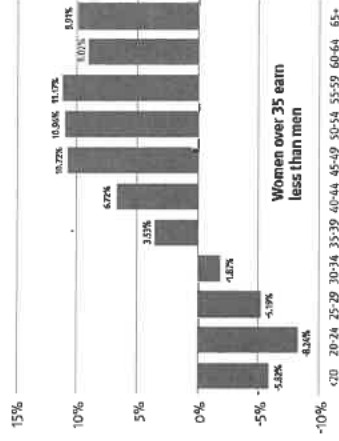
Lowest

19.42%

Queensland Fire and Emergency Services

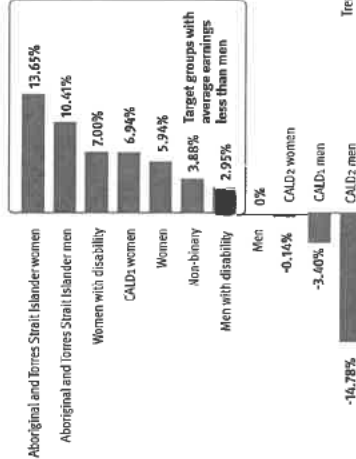
Gender pay gap by age^{1,6,7}

The earnings gap has improved for women in all age groups except for 60-64 year olds, with 55-59 year olds remaining the same as 2023.



Earnings gap across target groups^{1,7}

The earnings gap has slightly improved across every target group since 2023. In 2024, men who identify as CALD2 remained in positive territory, and women in the same cohort decreased from last year, now only slightly above parity.



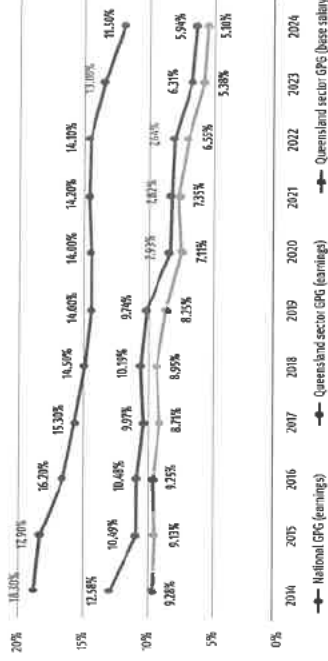
Our State of the sector report provides more information on the diverse target groups.

What causes the gender pay gap?⁸

- Conscious and unconscious discrimination and bias in hiring decisions
- female-dominated industries historically attracting lower wages
- Lack of workplace flexibility
- Higher rates of part-time work for women
- Women may spend more time out of the workforce for caring responsibilities
- Women may have a disproportionate share of unpaid caring and domestic work

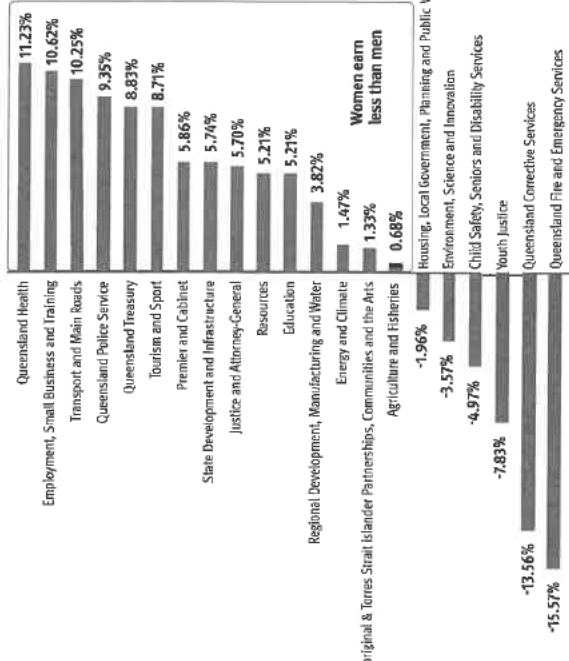
Gender pay gap (as if working full-time)^{1,7,8}

The gender pay gap continues to narrow, and the sector gender pay gap is half that of the national gender pay gap of 11.5%.



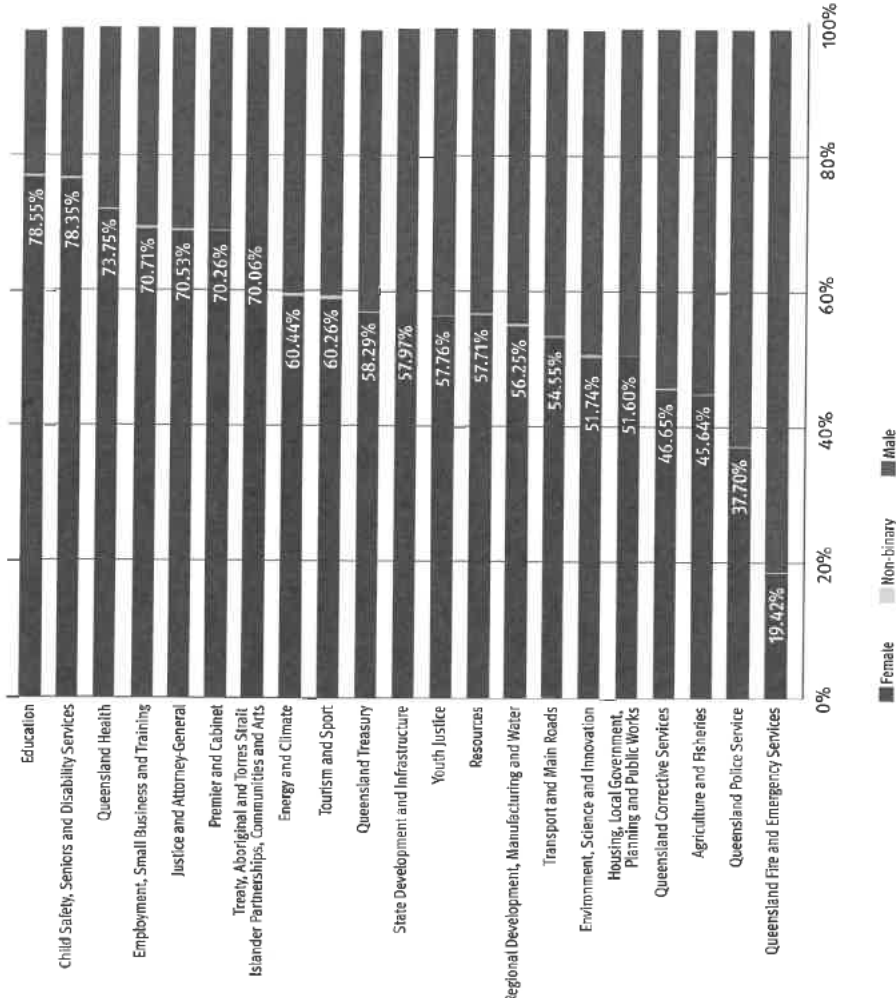
Gender pay gap by agency^{1,7}

Agencies not impacted by significant machinery-of-government changes in 2023 have narrowed their gender pay gap, with the exception of Queensland Health and Queensland Treasury.



% of women in agencies¹

Percentage of total headcount – June 2024.



Definitions

Base salary	Base salary refers to the average salary of employees over a year period and does not include allowances.
Earnings	Earnings are calculated on the salary and regular allowances paid to employees, typically including SES motor vehicle allowances, locality allowances and higher duties. Shift allowances and penalty rates can be regular allowances but not always. Average annual earnings do not include one-off or sporadic payments such as travelling allowances. Information on earnings is collected as at the quarterly snapshot date and is extrapolated over a 12-month period.
Gender pay gap	The methodology for gender pay gap in the Queensland public sector is the difference between the average annual earnings for male and female employees, as a proportion of male average annual earnings. Earnings includes base salary and regular allowances. Earnings reflect employees' full-time earnings (regardless of whether the employee works part-time).
Minimum Obligatory Human Resource Information (MOHRI)	MOHRI is the methodology used for the collection and reporting of data on a quarterly basis. It is used to provide information on the Queensland public sector workforce profile, including (but not limited to) data on age, gender, occupation, employment status, location and leave. for gov.qld.gov.au/minimum-obligatory-human-resource-information-mohri
SO, SES and CE classification levels	SO, SES, and CE are acronyms that are used within the Queensland public sector if referring to senior officers, senior executive service and chief executive level.
CALD	Culturally and linguistically diverse.
CALD1	Born overseas.
CALD 2	Speak a language at home other than English.

References

- 1 MOHRI June 2024 workforce data.
- 2 Queensland public sector figures are based on equivalent classifications across administrative (AO), operational (OO), technical (TO) and professional (PO) streams.
- 3 Non-binary identification to date is low and this data is not visible in some graphs.
- 4 Based on a study of executive recruitment and selection reports and appointment information January 2019 – June 2024.
- 5 This figure is for around half of the competitive recruitment processes where gender data was centrally available. The finding is consistent with research that women may not apply until they meet or exceed the criteria.
- 6 The gender pay gap varies across age groups, with younger women having higher average earnings than men up to around age 35, but a reversal after age 35. This is consistent with research findings about a parent penalty for women.
- 7 Average annual earnings for men compared with women, and men and women in other target groups, represented as a proportion of male average annual earnings.
- 8 Gender Indicators | Australian Bureau of Statistics. The ABS data collection has a slightly different formula, excluding part-time employees, while the Queensland public sector data collection calculates income for part-time employees as if they were working full-time.
- 9 Australian Retirement Trust June 2024 superannuation data.

Produced by the

Office of the Special Commissioner, Equity and Diversity

Find out more

psc.qld.gov.au/osc



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Industrial Relations (Tribunals) Rules 2011, r 53

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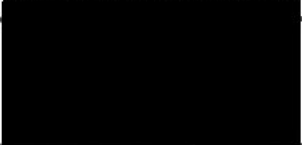

Matter details

Applicant:	Queensland Council of Unions and Anor
	v
Respondent:	State of Queensland (Office of Industrial Relations)

Exhibit details

Name of document:	Deputy Premier Letter to Ms Jacqueline King
Marked:	SD-8
Mentioned in the affidavit of:	Shane Victor John Donovan

Signature

Full name of deponent/ substitute signatory:	Shane Victor John Donovan
Signature of deponent/ substitute signatory:	
Full name of witness:	Phoelbe Lee Everingham
Signature and type of witness:	 <input type="checkbox"/> Justice of the Peace <input type="checkbox"/> Commissioner for Declarations <input checked="" type="checkbox"/> Lawyer
Sworn/Affirmed at [place]:	1 William Street Brisbane
Date:	25/7/2025



The Hon Jarrod Bleijie MP
Deputy Premier
Minister for State Development, Infrastructure and Planning
Minister for Industrial Relations

Our ref: OUT25/854/INTC2025-1435354213-114748

20 MAR 2025

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ABN 65 959 415 158

Ms Jacqueline King
General Secretary
Queensland Council of Unions
jacquelinek@qcu.asn.au

Dear Ms King

I would like to thank you for meeting with representatives from my Department and the Department of the Premier and Cabinet on 19 February 2025 to discuss the approach to Queensland state public sector bargaining.

I understand that discussions were productive, and I trust that we can continue to work together to deliver on the Queensland Government's commitment to ensuring it is an employer of choice, while also maintaining a clear focus on respecting taxpayers' money. We want Queensland workers to have adequate protections and fair conditions in their employment, to be safe at their workplace and paid competitively.

I can confirm that the Queensland Government is committed to a central Public Sector Wages Policy that will apply to all negotiations moving forward. Consistent with the discussions on 19 February 2025, the Public Sector Wages Policy includes:

1. A maximum headline wage increase available for each year of the agreement up to 3.5% per annum depending upon inflation.
 - a. For year 1: the headline wage increase consists of:
 - i. a 3% wage increase. This is paid on the higher of the award or the agreement rate at the current nominal expiry date; and
 - ii. up to a maximum additional 0.5%, to respond to inflationary conditions. This component is known as the CPI Uplift Adjustment ('CUA') and will be paid into base where the relevant through the year March CPI outcome exceeds the headline wage increase.
 - b. For years 2 and 3 the headline wage increases consist of:
 - i. a 2.5% wage increase. This is paid on the preceding agreement rate of pay (inclusive of the CUA where triggered in the preceding year); and
 - ii. the CUA element, as per year one, except it can be up to a maximum additional 1% for years 2 and 3.
2. Any other financial elements (e.g. allowances) of the agreement that usually grow in line with the headline wage increase provided will grow in accordance with the increases outlined above.
3. Three year agreement terms.
4. The date for the first headline wage increases will be the first day of the month in which in-principle agreement is reached following the nominal expiry date, unless otherwise approved by government.

The cost of the maximum headline wage increase, including the CUA mechanism if triggered, will be met on a state-share basis. Agencies will not be funded for initiatives outside of Public Sector Wages Policy and will need to ensure that such initiatives align with this Government's commitments.

I can confirm that agencies involved in bargaining in 2025 have been advised of the Public Sector Wages Policy, and have been informed of the expectation by this Government that it is communicated on a bargain-by-bargain basis following the discussion on 19 February 2025.

I can also advise that these agencies have been informed of approval processes, and it is my expectation that they will seek these approvals in a timely and appropriate manner.

The Office of Industrial Relations will continue to work closely with public sector agencies with agreements expiring in 2025 as a priority. This will include providing support and guidance about the detail of the new Public Sector Wages Policy, and the processes required to obtain approval of their bargaining frameworks.

If you require any further information regarding this matter, please contact my Chief of Staff, Mr Nathan Ruhle, by email at industrialrelations@ministerial.qld.gov.au or by telephone on (07) 3719 7100.



DEPUTY PREMIER

Minister for State Development, Infrastructure and Planning
Minister for Industrial Relations



Form 21 – Certificate of Exhibit to Affidavit

Industrial Relations Act 2016, s 989

Industrial Relations (Tribunals) Rules 2011, r 53

Information

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- For further information please refer to the website www.qirc.qld.gov.au or contact the Industrial Registry on 1300 592 987 or via email at qirc.registry@qirc.qld.gov.au.

Matter details

Applicant:

Queensland Council of Unions and Anor

v

Respondent:

State of Queensland (Office of Industrial Relations)

Exhibit details

Name of document:

Review of clauses

Marked:

SD-9

**Mentioned in the
affidavit of:**

Shane Victor John Donovan

Signature

**Full name of deponent/
substitute signatory:**

Shane Victor John Donovan

**Signature of deponent/
substitute signatory:**

[Redacted signature]

Full name of witness:

Phoebe Lee Everingham

**Signature and type of
witness:**

[Redacted signature]

☐

Justice of the Peace

☐

Commissioner for Declarations

☒

Lawyer

Sworn/Affirmed at [place]:

1 William Street Brisbane

Date:

25/7/2025

SD-9

Review of clauses		
Current as at: 16 July 2025		
Agreement name	Does the agreement currently contain a clause which states that it is a term of this agreement that no employee will receive a rate of pay that is less than the parent award	If yes what clause number
Tourism and Events Queensland Certified Agreement 2022 (CB/2023/83)	Yes	1.3
Youth Detention Centre Certified Agreement 2023	Yes	2.18
Stadiums Queensland Staff Certified Agreement 2023	No	N/A
Queensland Ambulance Service Certified Agreement 2022 (CB/2023/9)	Yes	5.3
QFleet Certified Agreement 2022	Yes	2.4
Transport and Main Roads Certified Agreement 2022 (CB/2023/100)	Yes	2.18
Transport and Main Roads Operational Employees' Certified Agreement 2022 (CB/2023/106)	No	N/A
Maritime Safety Queensland, Maritime Operations Certified Agreement 2022	No	N/A
Parliamentary Service Electorate Staff Certified Agreement 2023	Yes	2.7
QBuild Field Staff Certified Agreement 2022 (FSA11)	Yes	1.1
Department of Education State School Teachers' Certified Agreement 2022 (CB/2022/135)	No	N/A
Queensland Police Service Protective Services Officers Certified Agreement 2022 (CB/2023/85)	Yes	9(6)
Department of Education Teacher Aides' Certified Agreement 2022	Yes	6.3(c)
Office of the Queensland Ombudsman Certified Agreement 2022 (CB/2023/56)	Yes	2.1(2)
Aboriginal and Torres Strait Islander Health Workforce (Queensland Health) Certified Agreement (No. 2) 2023 (HWF EB2)	Yes	17.4

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<u>Department of Education Certified Agreement 2022</u>	Yes	1.10(f)
<u>Queensland Health Building, Engineering & Maintenance Services Certified Agreement (No. 8) 2022 (CB/2023/54)</u>	Yes	2.5.4
<u>Queensland Public Health Sector Certified Agreement (No. 11) 2022 (CB/2023/41)</u>	Yes	2.2.4
<u>Health Practitioners and Dental Officers (Queensland Health) Certified Agreement (No. 4) 2022</u>	Yes	2.2.4
<u>Queensland Police Service Staff Members Certified Agreement 2023</u>	Yes	9(6)
<u>State Government Entities Certified Agreement 2023 (CB/2023/112)</u>	Yes	2.11(6)
<u>Queensland Fire and Emergency Services Certified Agreement 2022 (CB/2023/45)</u>	Yes	8(6)
<u>Queensland Police Service Certified Agreement 2022 (CB/2022/127)</u>	Yes	9(3)
<u>Department of Education Cleaners' Certified Agreement 2022</u>	Yes	6.3
<u>Nurses and Midwives (Queensland Health and Department of Education) Certified Agreement (EB11) 2022 (CB/2022/133)</u>	No	N/A
<u>Medical Officers' (Queensland Health) Certified Agreement (No. 6) 2022</u>	Yes	2.1.4
<u>WorkCover Employing Office - Certified Agreement 2022 (CB/2023/60)</u>	Yes	3.1
<u>TAFE Queensland (TAFE Services Employees) Certified Agreement 2022 (CB/2023/35)</u>	Yes	12
<u>Office of the Information Commissioner Certified Agreement 2022</u>	Yes	2.4
<u>South Bank Employing Office Employees' Certified Agreement 2023 (CB/2023/109)</u>	Yes	1.1
<u>TAFE Queensland Educators Certified Agreement 2023</u>	Yes	8
<u>CITEC Certified Agreement 2023 (CB/2024/2)</u>	Yes	2.3
<u>Child Safety and Youth Justice Certified Agreement 2023</u>	Yes	2.13

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Queensland Corrective Services - Correctional Employees' Certified Agreement 2021 (CB/2022/47)	No	N/A
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Industrial Relations (Tribunals) Rules 2011, r 53

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Matter details

Applicant:	Together Queensland and Queensland Council of Unions
	v
Respondent:	State of Queensland (Office of Industrial Relations)

Exhibit details

Name of document:	Directive 12/12
Marked:	SD-10
Mentioned in the affidavit of:	Shane Victor John Donovan

Signature

Full name of deponent/ substitute signatory:	Shane Victor John Donovan		
Signature of deponent/ substitute signatory:			
Full name of witness:	Phoebe Lee Everingham		
Signature and type of witness:			
	<input type="checkbox"/> Justice of the Peace	<input type="checkbox"/> Commissioner for Declarations	<input checked="" type="checkbox"/> Lawyer
Sworn/Affirmed at [place]:	1 William Street Brisbane		
Date:	25/7/2025		



MINISTER ASSISTING THE PREMIER

For the purposes of section 52(3) of the *Public Service Act 2008*, this directive prevails over an industrial instrument. Section 687(2) of the *Industrial Relations Act 1999* does not apply to this directive.

DIRECTIVE No. 12/12
NOVEMBER 2012

- 1. TITLE:** **State Wage Case and Certified Agreements**
- 2. PURPOSE:** This ruling provides that State Wage Cases do not increase the wages paid under certified agreements.
- 3. LEGISLATIVE PROVISIONS:** Sections 52 and 54 of the *Public Service Act 2008*. Section 687 of the *Industrial Relations Act 1999*.
- 4. APPLICATION:** This directive applies to all public service employees who are covered by a certified agreement.
- 5. DEFINITIONS:** **award** is as defined in the *Industrial Relations Act 1999* (Qld)

certified agreement is as defined in the *Industrial Relations Act 1999* (Qld)

State Wage Case means a General Ruling or a Statement of Policy of the Queensland Industrial Relations Commission made under section 287 or 288 of the *Industrial Relations Act 1999* (Qld) about the Queensland minimum wage
- 6. RULING:** A State Wage Case does not increase the wages paid under a certified agreement.

However, where a State Wage Case has the effect that an award provides for wages which are greater than a certified agreement that applies to the employees covered by the award, the award wages prevail.
- 7. EFFECTIVE DATE:** This directive is to operate from **30 November 2012**.
- 8. VARIATION:** This directive can be varied by –
 - the Minister responsible for industrial relations; or
 - legislation.
- 9. INCONSISTENCY:** Sections 52 and 54 of the *Public Service Act 2008* and sections 686 and 687 of the *Industrial Relations Act 1999* apply when there is an inconsistency between an act, regulation or industrial instrument.
- 10. SUPERCEDES:** None.
- 11. PREVIOUS REFERENCES:** None.



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Matter details

Applicant:	Queensland Council of Unions and Anor
	v
Respondent:	State of Queensland (Office of Industrial Relations)

Exhibit details

Name of document:	Analysis of Impacts of SWC outcome of 3.5 on state public sector agreements
Marked:	SD-11
Mentioned in the affidavit of:	Shane Victor John Donovan

Signature

Full name of deponent/ substitute signatory:	Shane Victor John Donovan
Signature of deponent/ substitute signatory:	
Full name of witness:	Phoebe Lee Everingham
Signature and type of witness:	 <input type="checkbox"/> Justice of the Peace <input type="checkbox"/> Commissioner for Declarations <input checked="" type="checkbox"/> Lawyer
Sworn/Affirmed at [place]:	1 William Street Brisbane
Date:	25/7/2025

2025 State Wage Case Outcome Impacts at 1 September 2025
- without prejudice -

Projected outcome	3.50%	\$0
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How many Agreements does the Award Rate become payable for?	29
How many Agreements remain higher than the Award?	6

What percentage of Agreements in the public sector does the Award rate become payable for?	85.29%
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How many agreements expiring in 2025 does the Award rate become payable for?	22
How many agreements expiring in 2026 does the Award rate become payable for?	6

Summary of impacts of 3.5% SWC 2025 Outcome - without prejudice-

Possible State Wage Case			2025 Outcome:		The higher		3.50%		Dollar value		\$0		How many incremental levels did the Award rate become payable		What percentage of the incremental levels under the Agreement are affected?		Minimum % Agreement is higher than Award		Maximum % Agreement is higher than Award		Minimum \$ Agreement is higher than Award		Maximum \$ Agreement is higher than Award	
Agreement name	Expiry year	Is the Agreement impacted by an Award overtake issue?	Award	Nominal expiry date of the agreement	Does the Award rate currently exceed the Agreement rate? (TRUE/FALSE)	Min % Award Overtake	Max % Award Overtake	Min \$ Award Overtake	Max \$ Award Overtake															
Ambulance Services ATSHW	2025	Yes	Ambulance Service Employees Award	31/08/2025	TRUE	-0.55%	-1.91%	-\$773.85	-\$3,142.54	9	68	13.24%	0.28%	30.11%	\$230.65							\$29,460		
	2025	No	Hospital and Health Services General Employees Award	31/08/2025	FALSE	0.00%	0.00%	\$0.00	\$0.00	0	43	0.00%	0.21%	57.69%	\$159.11							\$91,433.03		
QH BEMS	2025	No	Building Engineering and Maintenance Services Award	31/08/2025	FALSE	0.00%	0.00%	\$0.00	\$0.00	0	12	0.00%	23.14%	41.24%	\$11,909.59							\$27,893.65		
GTFC	2025	Yes	Queensland Public Service Officers and Other Employees Award	30/06/2025	TRUE	-0.44%	-4.44%	-\$232.02	-\$3,368.58	60	64	93.75%	0.08%	1.39%	\$40.58							\$649.87		
Core		Yes																						
			Award for Operational Employees in Disability and Forensic Services - State 2016		TRUE	-1.43%	-1.50%	-\$974.95	-\$1,590.73	18	18	100.00%	0.00%	0.00%	\$0.00							\$0.00		
			Building Engineering and Maintenance Services Award		FALSE	0.00%	0.00%	\$0.00	\$0.00	0	42	0.00%	2.20%	33.42%	\$1,223.22							\$21,785.74		
			Civil Construction Operations and Maintenance General Award		FALSE	0.00%	0.00%	\$0.00	\$0.00	0	15	0.00%	4.41%	14.38%	\$2,306.40							\$10,476.51		
			General Employees (Old Govt Departments) and Other Employees Award		TRUE	-0.26%	-1.51%	-\$129.23	-\$2,284.55	66	70	94.29%	0.14%	2.55%	\$82.37							\$1,312.59		
	2026		Legal Aid Employees Award	30/06/2026	TRUE	-0.11%	-1.51%	-\$43.73	-\$2,284.55	119	119	100.00%	0.00%	0.00%	\$0.00							\$0.00		

[illegible]

Medical	2025	Yes				30/06/2025	TRUE	-1.56%	-5.24%	-\$4,647.35	-\$4,987.92	48	57	84.21%	7.82%	8.30%	\$13,207.46	\$15,705.79
Medical Award																		
NSQ	2025	No				Queensland Public Service Officers and Other Employees Award	FALSE	0.00%	0.00%	\$0.00	\$0.00	0	20	0.00%	1.91%	60.95%	\$2,735.68	\$55,364.99
Nurses	2025	Yes				Nurses and Midwives Award	TRUE	-0.68%	-0.68%	-\$832.85	-\$832.85	1	46	2.17%	1.87%	7.00%	\$1,859.29	\$5,400.42
ONE						Queensland Public Service Officers and Other Employees Award	FALSE	0.00%	0.00%	\$0.00	\$0.00	0	11	0.00%	39.46%	63.99%	\$30,545.11	\$55,843.43
Ombudsman	2025	Yes				Queensland Public Service Officers and Other Employees Award	TRUE	-0.16%	-1.92%	-\$2,933.55	-\$2,933.55	62	64	96.88%	0.18%	0.80%	\$86.09	\$373.91
Parliamentary Services - Electorate Officers	2025	Yes				Queensland Public Service Officers and Other Employees Award	TRUE	-0.16%	-1.93%	-\$79.27	-\$2,960.55	62	64	96.88%	0.18%	0.80%	\$86.09	\$372.91
Police	2026	No				Queensland Parliamentary Services	FALSE	0.00%	0.00%	\$0.00	\$0.00	0	12	0.00%	14.35%	42.24%	\$12,153.93	\$35,256.44
Police	2025	Yes				Police Award	TRUE	-0.06%	-4.01%	-\$58.73	-\$2,440.00	21	60	35.00%	0.01%	3.07%	\$11.27	\$2,690.94
Protective Services	2025	Yes				Queensland Public Service Officers and Other Employees Award	TRUE	-0.06%	-4.01%	-\$58.73	-\$2,440.00	21	22	95.45%	0.01%	0.01%	\$11.27	\$11.27
Public Health Sector	2025	Yes				Queensland Public Service Officers and Other Employees Award	TRUE	0.00%	-1.77%	-\$1.51	-\$1,387.25	89	119	74.79%	0.03%	12.90%	\$53.45	\$5,343.27
						Hospital and Health Services General Employees Award	TRUE	-0.03%	-1.92%	-\$35.85	-\$1,598.44	89	130	68.46%	0.05%	12.99%	\$64.10	\$5,331.08
Child Field	2025	No				Building Engineering and Maintenance Services Award	FALSE	0.00%	0.00%	\$0.00	\$0.00	0	13	0.00%	11.42%	38.66%	\$10,380.52	\$26,150.68
Queensland Corrective Services	2025	Yes				Correctional Employees Award	TRUE	-7.05%	-7.10%	-\$4,635.52	-\$7,649.93	22	22	100.00%	0.00%	0.00%	\$0.00	\$0.00
Queensland Fire and Emergency Services	2025	Yes				Firefighters Award	TRUE	-0.05%	-27.66%	-\$29.55	-\$34,475.24	45	63	71.43%	0.26%	9.21%	\$324.22	\$11,917.47
Office	2025	Yes				Queensland Public Service Officers and Other Employees Award	TRUE	-1.85%	-2.26%	-\$907.52	-\$3,108.69	35	35	100.00%	0.00%	0.00%	\$0.00	\$0.00
QPS Staff Member Certified Agreement 2023		Yes				Building Engineering and Maintenance Services Award	FALSE	0.00%	0.00%	\$0.00	\$0.00	0	20	0.00%	2.20%	28.58%	\$1,790.02	\$19,328.65
						General Employees (Old Govt Departments) and Other Employees Award	TRUE	-1.42%	-1.51%	-\$624.82	-\$2,284.55	63	84	75.00%	10.73%	12.60%	\$6,804.49	\$12,298.69

2025	1/07/2026	TRUE	-0.11%	-1.51%	-\$43.73	-\$2,284.55	52	137	67.15%	2.19%	56.05%	1043.535	\$53,833.04
Southbank Employing Office Certified Agreement	Queensland Public Service Officers and Other Employees Award	TRUE	-0.11%	-1.51%	-\$43.73	-\$2,284.55	52	137	67.15%	2.19%	56.05%	1043.535	\$53,833.04
	Miscellaneous Administrative Employees Award	TRUE	-0.89%	-9.73%	-\$498.27	-\$5,174.63	3	10	30.00%	4.02%	45.37%	\$2,598.19	\$29,893.38
2026	26/03/2026	FALSE	0.00%	0.00%	\$0.00	\$0.00	0	4	0.00%	7.72%	28.25%	\$5,937.41	\$14,990.87
Stadiums Queensland Staff Certified Agreement	General Employees (Qld Govt Departments) and Other Employees Award	TRUE	-1.31%	-9.05%	-\$712.39	-\$4,812.14	3	56	5.36%	4.39%	83.42%	\$2,208.04	\$46,698.31
	Stadiums Queensland Award	TRUE	-1.31%	-9.05%	-\$712.39	-\$4,812.14	3	56	5.36%	4.39%	83.42%	\$2,208.04	\$46,698.31
TAFE Educators	TAFE Award	TRUE	-0.51%	-4.81%	-\$0.39	-\$6,165.36	28	30	93.33%	0.27%	0.27%	\$210.54	\$210.54
TAFE Services	TAFE Award	TRUE	-0.11%	-1.91%	-\$0.11	-\$3,954.58	133	133	100.00%	0.00%	0.00%	\$0.00	\$0.00
Teacher Aides	General Employees (Qld Govt Departments) and Other Employees Award	TRUE	-0.12%	-1.90%	-\$76.77	-\$1,528.94	11	12	91.67%	0.15%	0.15%	\$90.01	\$90.01
Teachers	Teaching in State Education Award	TRUE	-0.92%	-3.29%	-\$1,008.95	-\$3,248.92	10	39	25.64%	1.08%	18.13%	\$1,521.62	\$22,401.20
Tourism and Events Queensland ¹	Tourism and Events Queensland Award	FALSE	0.00%	0.00%	\$0.00	\$0.00	0	14	0.00%	0.36%	0.37%	\$209.03	\$490.11
TMR Ops	Building Engineering and Maintenance Services Award	TRUE	-1.87%	-1.90%	-\$1,254.49	-\$2,065.33	18	27	66.67%	22.17%	40.12%	\$12,092.79	\$63,104.80
	Civil Construction Operations and Maintenance General Award	FALSE	0.00%	0.00%	\$0.00	\$0.00	0	21	0.00%	3.94%	20.10%	\$2,524.13	\$14,646
TMR White	General Employees (Qld Govt Departments) and Other Employees Award	TRUE	-1.55%	-4.49%	-\$716.61	-\$3,368.58	63	63	100.00%	0.00%	0.00%	\$0.00	\$0.00
2025	30/06/2025	TRUE	-0.07%	-4.49%	-\$37.54	-\$3,368.58	110	119	92.44%	0.08%	2.70%	\$40.58	\$1,119.48
WorkCover	Workcover Qld Employees Award	TRUE	-0.53%	-7.59%	-\$331.53	-\$4,271.30	5	44	11.36%	0.99%	15.42%	\$640.23	\$15,528.57
Youth Detention	General Employees (Qld Govt Departments) and Other Employees Award	TRUE	-1.42%	-1.51%	-\$624.82	-\$2,284.55	63	63	100.00%	0.00%	0.00%	\$0	\$0.00
	Youth Detention Centre Employees Award	TRUE	-1.43%	-1.50%	-\$974.95	-\$1,431.20	15	15	100.00%	0.00%	0.00%	\$0.00	\$0.00