



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: _____

Just

1. Matter details

Applicant:	Queensland Council of Unions & 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:	☐ Applicant/Appellant	☒ Respondent (or as the case may be)
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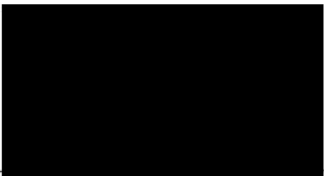
2. Contact details of party filing this affidavit

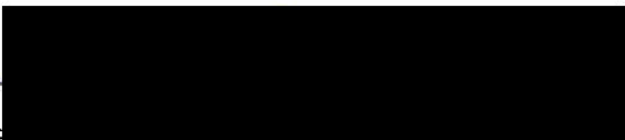
Title [please select]:	☒ Mr	☐ Mrs	☐ Ms	☐ Miss	☐ Mx	☐ Other: _____
Name of Party:	State of Queensland (Office of Industrial Relations)					
Name of contact person: [if party is an organisation]	Emma Bristow					
Postal/Service address:	1 William street					
	Suburb/Town Brisbane				Postcode 4000	
Phone 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]:	☒ Mr	☐ Mrs	☐ Ms	☐ Miss	☐ Mx	☐ Other: _____
Deponent's Name:	Shane Victor John 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

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 currently employed as the Executive Director, Industrial Relations, in the Office of Industrial Relations (**OIR**). I have been employed in this position since 29 April 2025.
2. Prior to my current position, I was employed as Senior Director, Industrial Relations - Public Sector, OIR. I commenced that position in or around July 2019.
3. 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, a number of arbitrations in the Queensland public sector. I have also led a number of arbitrations from an agency perspective.
4. I make this Statement on my own behalf, and I am authorised by the Office of Industrial Relations to make this Statement on its behalf.

Signed:

[Signature of the deponent/substitute signatory]

Taken by:

J

Evidence

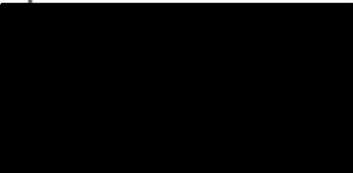
Use this extra page if you need more space in the affidavit ensuring that Part 5 containing the signature is always on the last page of the form and that each additional page is signed at the bottom of the page by the deponent and witness.

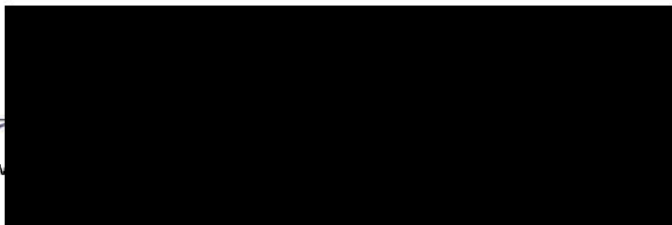
The proceedings

5. I have read the Applications filed by the Queensland Council of Unions (QCU) and Together Queensland (TQ) which are the subject of these proceedings. I understand the Applicants are seeking a General Ruling to:
 - a. increase the Queensland Minimum Wage to \$1,004.90; and
 - b. increase the wages or salaries prescribed by all state awards by a wage adjustment of 4.75%; and
 - c. increase existing allowances in all state awards which relate to work or conditions which have not changed in service increments by 4.75%; and
 - d. have an operative date of 1 September 2026 for the increases.
6. The Applications seek an outcome consistent with that determined by the Fair Work Commission as part of its Annual Wage Review 2026 (AWR).
7. I have read the AWR decision. My understanding is the Fair Work Commission determined that outcome on the basis that it represented an opportunity to restore the real value of modern award wages, despite it being higher than inflationary guides.
8. I have read the Statement of Agreed Facts jointly agreed and filed by the parties on 16 July 2026.
9. 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. a fair and reasonable increase to the Queensland Minimum Wage;
 - b. 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
 - c. an operative date of 1 September 2026.
10. In coming to this position, the State has taken into account the present industrial context. The State seeks competitive wages and adequate protections for the few workers in this jurisdiction who do not receive the benefits associated with regular enterprise bargaining.

The industrial relations framework in Queensland

11. It is my experience the IR Act provides the foundational legislative framework for the conduct of industrial relations within Queensland.

Signed: 
[Signature of the deponent/substitute signatory]

Taken by: 

Law

12. 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.
13. The industrial framework in Queensland provides for a system of employment conditions which includes:
- a. the Queensland Employment Standards;
 - b. Awards; and
 - c. Certified Agreements.
14. 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.

Workers in the national jurisdiction

15. 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

16. I have read the AWR decision (Document A in the **Agreed Bundle** of Documents filed on 16 July 2026) and note the Fair Work Commission:
- a. proceeded on the basis the number of National Minimum Wage (NMW)-reliant employees is a very small proportion of the workforce, "only a fraction of the Australian Government's estimates" of 23,900 or 0.2% of the workforce (see paragraphs 13 and 14 of Document A); and
 - b. indicated 21.1% of all employees in that jurisdiction are modern award reliant (see paragraph 15 of Document A).
17. A Statistical Report was prepared by the Fair Work Commission for the AWR (Document W in the Agreed Bundle). Chart 7.1 indicates that:
- a. 34.6 % of workers have their pay set through collective agreements; and
 - b. 22.7 % of workers have their pay set through awards; and
 - c. 38.5 % of workers have their pay set through individual arrangements; and
 - d. 4.1 % of workers are the owner manager of an incorporated enterprise.

Signed

Taken by:

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18. Considering the information from the AWR decision and the AWR Statistical Report, it seems fair to say that approximately 20 – 23 % of national system workers have their wages set through awards; whereas a higher number of workers have their pay set through agreements and the largest group of workers have their pay set through individual arrangements.
19. Based on data gathered for the Fair Work Commission, the AWR decision sets out characteristics relating to the 10 most common modern awards, applying to the most modern award reliant employees, as listed below (see Table 4 in paragraph 24 contained in Document A):
- 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. *Building and Construction General On-site Award 2020;*
 - h. *Cleaning Services Award 2020;*
 - i. *Clerks—Private Sector Award 2020;*
 - j. *Vehicle Repair, Services and Retail Award 2020*
20. I note the Fair Work Commission identified in Table 1 at page 9 of the AWR Decision 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 (35.9%) of modern award-reliant employees are considered low paid.
21. In the AWR decision, the Fair Work Commission also identifies that over the last decade the modern award-reliant workforce has “become more female, more likely to work part-time hours and more casualized.”¹
22. 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 (see for instance paragraph 2 and 31 of the AWR decision;

Signed:

[Signature of the deponent/substitute signatory]

Taken by:

- b. cannot be covered by an award if they have a guarantee of earnings in excess of \$190,100 per annum (see for instance section 47(2) of the *Fair Work Act 2009*); and
- c. will not have an award apply to them in circumstances where an operative enterprise agreement applies to them (see for instance section 57 of the *Fair Work Act 2009*).

23. I note at paragraph 122 of the AWR decision the Fair Work Commission identifies there has been a significant increase in the number of employees covered by enterprise agreements, notwithstanding the number of enterprise agreements has not increased by a proportionate amount. They also identify at paragraph 122 the number of employees covered by current enterprise agreements reached a record level in 2025, at 2,735,000, as outlined in Table 18 of the AWR decision.

24. While the number of employees covered by an agreement may be increasing, my understanding in reviewing Table 7.1 of the AWR Statistical Report is that the proportionate number of employees covered by an agreement has declined over the period 2016 to 2025 from 38.5 % to 34.6 %. I also note the number of current enterprise agreements has declined over the period December 2015 to December 2025 from 14,674 to 11,460 (see Table 10.1 of Document W).

25. This data 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

26. I am aware that as part of the Annual Wage Review, the Fair Work Commission considers the needs of 'low paid' workers. The Fair Work Commission has referred to two statistical measures of the low paid benchmark which are as follows (see paragraph 84 of AWR decision):

- a. based on Australian Bureau of Statistics (ABS) data on the Characteristics of Employment data from August 2025 that the benchmark is \$1,164.67 per week which is equivalent to \$60,562.84 per annum.
- b. based on ABS Employee Earnings and Hours data from May 2025, the benchmark is \$1,234.67 per week which is equivalent to \$64,202.84 per annum.

27. I note that the AWR decision indicates 35.9% of all modern award reliant employees were assessed as falling within the low paid category (see Table 1 in paragraph 15 of AWR decision).

Australian private sector gender equality

28. I have reviewed the Workplace Gender Equality Agency Employer Data Explorer report for the Australian Private Sector for 2024-25 dated 3 March 2026. Exhibit SVD-1 (pages 15-36) is a

Signed:

[Signature of the deponent/substitute signatory]

Taken by:

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copy of that report. It indicates that for the Australian Private Sector the average total remuneration gender pay gap is 21.1%.

Commonwealth public service

29. I have reviewed the Workplace Gender Equality Agency Commonwealth Public Sector gender equality results for the 2024 reporting period available on 14 May 2026. Exhibit **SVD-2 (pages 37-43)** is a copy of that report. This report provides that for the Commonwealth public service the average total remuneration gender pay gap is 7.4%.
30. I understand the parties have agreed in the Statement of Agreed Facts filed on 16 July 2026 that the Australian Public Service employs 195,847 workers, consistent with Australian Public Service Employment Data from 31 December 2025. My understanding is that this number does not represent a majority of the employees in the national system given the AWR decision identifies the number of modern award reliant workers is about 2.8 million.

Victorian public service

31. The Victorian Government published a State of the Sector Report 2025 in April 2026. Amongst other things, it provides that:
- a. the Victorian public sector has an average gender pay gap of 17.0% and the Victorian public service has an average gender pay gap of 5.6%. **SVD-3 (pages 44-55)** is an excerpt of the data that informed that report which is available on the Victorian Public Sector Commission's website (<https://www.vpsc.vic.gov.au/public-sector-data/workforce-data-state-public-sector-2025/employee-and-executive-pay-leave-and-work-arrangements/employee-pay-and-gender-pay-2025> accessed: 23 July 2026).
 - b. The number of Victorian public service workers at June 2025 was 393,663 people as outlined in the Statement of Agreed Facts filed by the parties on 16 July 2026.
32. My understanding is that the Victorian government does not employ a majority of workers in the national system given the AWR decision identifies the number of modern award-reliant workers is about 2.8 million.

Workers in the Queensland jurisdiction

33. I understand from reviewing the sources footnoted on page 19 of the Statement of Agreement Facts, the Queensland jurisdiction consists of approximately 383,000 workers, comprised of:
- a. 333,329 workers in the Queensland state public sector (as estimated by the Public Sector Commission);
 - b. 45,870 workers in the Local Government Sector (as estimated by the Local Government Association of Queensland); and

Signed: _____

[Signature of the deponent/substitute signatory]

Taken by: _____

Lawyer

- 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

34. I understand the majority of workers in this jurisdiction are covered by both an award and a certified agreement. I am aware the parties to these proceedings have agreed at page 19 of the Statement of Agreed Facts to an estimate of 97.4% coverage by certified agreements in this jurisdiction, and that public sector agreement coverage rates are slightly higher at an estimated 99% based on Public Sector Commission MOHRI data at the March quarter 2026.
35. I understand the parties have agreed at page 19 of the Statement of Agreed Facts, there are:
- a. 1,898 public sector workers who are entirely award reliant (as estimated by the Public Service Commission) and
 - b. 1,639 local government workers who are entirely award reliant (as estimated by the Local Government Association of Queensland); and
 - c. 14 staff employed by the Darling Downs-Moreton Rabbit Board covered by the *General Employees (Queensland Government Departments) and Other Employees Award – State 2015*; and
 - d. approximately 3,000 award reliant workers in Parents and Citizens Associations.
36. I understand there are 5,148 Queensland public sector employees covered by State awards whose base wages are in excess of \$190,100 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 if they earn in excess of \$190,100 per annum.
37. 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 remain contemporary.
38. 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.
- a. 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*.
 - b. 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 where

Signed: _____

[Signature of the deponent/substitute signatory]

Taken by: _____

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inflationary triggers are met. For year 1 of new certified agreements, this top up wage increase, known as the CPI Uplift Adjustment mechanism or 'CUA', is payable to the 154,261 workers under the 18 agreements certified to date.

'Low paid' workers

39. 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 23 above). In the Queensland public sector, as at 30 March 2026, only 2,628 employees received a full time equivalent rate of pay less than \$1,164.67 per week. That is a very small cohort out of the total 333,329 Queensland public sector workers and can be contrasted with the significantly higher rate of low paid workers in the national jurisdiction.

Gender equality

40. I have reviewed the *Queensland public sector gender pay equity dashboard 2025*. A copy of this dashboard is SVD-4 (pages 56-58). This dashboard provides that the average gender pay gap based on earnings is 5.8%.

Current industrial context in the Queensland public sector

41. 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 award-reliant workers are directly impacted by the State Wage Case. In the Queensland public sector this is estimated to be a group of 1,898 workers.
42. The Queensland public sector employs the majority of workers in the Queensland jurisdiction (333,329 out of approximately 383,000 workers) as outlined in the Statement of Agreed Facts filed on 16 July 2026.
43. The majority of Queensland public sector workers are covered by 36 certified agreements which are regularly negotiated – currently every three years. In 2025, 25 agreements nominally expired, and in 2026 a further eleven will nominally expire.
44. 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 is respectful of taxpayers' money.

Signed

[Signature of the deponent/substitute signatory]

Taken by:

45. The current public sector wages policy was explained in a letter to the Queensland Council of Unions, a copy of which is **SVD-5 (pages 59-61)**. The current policy provides for wage increases consisting of:
- 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.
 - 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.
46. To date, in principle agreement has been reached for more than approximately 56% of public sector workers to date. The 18 agreements certified to date cover an estimated 154,261 workers.
47. Each agreement reached will receive a wage increase in year 1 consistent with the public sector wages policy on the basis of the in principle agreement having been reached between the parties.
48. Part of the current industrial context in the Queensland public sector is that 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 27 of the 35 agreements currently operating in the sector: see for example clause 2.11 of the *State Government Entities Certified Agreement 2023*. A copy of Directive 12/12 is exhibit **SVD-6 (pages 62-63)**.
49. My understanding is that if the Commission were to apply an increase of 4.75% to all modern award wages and relevant allowances, this would have two effects:
- 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
 - it would indirectly impact workers who participate in collective bargaining in up to 29 certified agreements in the State public sector, including 6 currently in arbitration.
50. 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 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:

L

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]:	Brisbane
Date:	31/07/2026

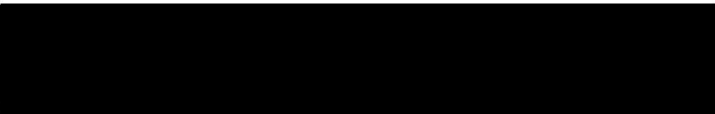
Alternative signature panel if substitute signatory signs

Complete this section only 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:	DAMIAN MATTHEW RIDGEMAN
Signature and type of witness:	 ☐ Justice of the Peace ☐ Commissioner for Declarations ☒ Lawyer
Date:	31 July 2026
Insert name of law practice/place of employment:	Coom Law

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: _____

INDEX OF EXHIBITS
AFFIDAVIT OF SHANE DONOVAN

Exhibit No	Description
SVD-1	WGEA Employer Gender Pay Gaps Report 2024-25
SVD-2	WGEA - 2024 Commonwealth public sector gender equity data
SVD-3	Victorian Government State of the Sector Report 2025
SVD-4	Queensland Public Sector Gender Pay Equity Dashboard 2025
SVD-5	Deputy Premier letter to Ms Jaqueline King dated 20 March 2025
SVD-6	Directive 12-12 State Wage Case and Certified Agreement



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 & Anor
	v
Respondent:	State of Queensland (Office of Industrial Relations)

Exhibit details

Name of document:	WGEA Employer Gender Pay Gaps Report 2024-25
Marked:	SVD-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:	Damian Matthew Ribballe
Signature and type of witness:	 ☐ Justice of the Peace ☐ Commissioner for Declarations ☒ Lawyer
Sworn/Affirmed at [place]:	Brisbane
Date:	31/07/2026



Navigation

Workforce
CompositionBoards and
Governing BodyEqual Remuneration
and Gender Pay GapEmployee Support
and FlexibilityEmployee
ConsultationSexual Harassment
Prevention and ActionCompare Employer
Data

Gender Equality Indicator 3

Equal remuneration and gender pay gapDashboard filters
Search by employerReporting year
2024 - 25Employer name (ABN)
Australian Private SectorSector
AllCorporate group
AllIndustry division
AllIndustry class
AllEmployer size
All**National**

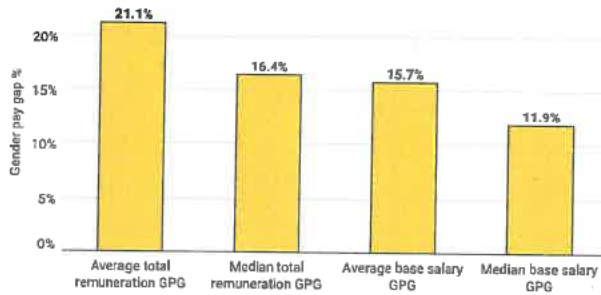
Australian Private Sector

ABN: 0000

Employer size: - | Women: 2,789,716 (51%) | Men: 2,637,105 (49%)

Industry division: -

Industry class: -

National gender pay gap**Gender composition by pay quartile**

Women | Men

	Women	Men	Average total remuneration
Total workforce	51%	49%	\$120,000
Upper quartile	36%	64%	\$221,000
Upper middle quartile	53%	47%	\$115,000
Lower middle quartile	58%	42%	\$83,000
Lower quartile	58%	42%	\$60,000

Employer Statement (optional)

Disclaimer

Formal policy/strategy on equal remuneration between women and men

Yes	74%	✓
No	26%	✗

Equal remuneration policy/strategy inclusions

Responded 'Yes' to having a policy/strategy on equal remuneration between women and men

Policy	58%
Strategy	70%
To achieve gender pay equity	61%
To close the gender pay gap	48%
To ensure no gender bias occurs at any point in the remuneration review process (for example at commencement, at ..	88%
To be transparent about pay scales and/or salary bands	43%
To ensure managers are held accountable for pay equity outcomes	38%
To implement and/or maintain a transparent and rigorous performance assessment process	65%

Conducted a gender pay gap analysis

Yes	68%	✓
No	32%	✗

Most recent gender gap analysis conducted

Responded 'Yes' to conducting a gender pay gap

Within the last 12 months	85%
Within the last 1-2 years	12%
More than 2 years ago but less than 4 years ago	2%

Actions taken as a result of the gender pay gap analysis

Responded 'Yes' to conducting a gender pay gap and took action as result

Corrected instances of unequal pay	55%
Created a pay equity strategy or gender equality action plan	26%
Developed a strategy to address workforce composition issues - e.g. attracting more underrepresented gender into specific higher-paying roles	25%
Identified cause/s of the gaps	68%
Reported results of pay gap analysis to all employees	28%
Reported results of pay gap analysis to the executive	65%
Reported results of pay gap analysis to the governing body	51%
Reviewed and implemented performance evaluation processes to ensure no gender bias	32%
Reviewed remuneration decision-making processes	52%
Reviewed talent acquisition processes	31%

Type of gender pay gap analysis undertaken

Responded 'Yes' to conducting a gender pay gap

A by-level gap analysis which compares the difference between women's and men's average pay within the same employee category	55%
A comprehensive gender pay gap analysis, looking at base salary and total remuneration, workforce composition, talent acquisition and employee movements	24%
Like-for-like pay gaps analysis which compares the same or similar roles of equal or comparable value to identify unequal pay	81%
Overall gender pay gap analysis to identify the difference between women's and men's average pay and gender composition across the whole organisation	63%



Form 21 – Certificate of Exhibit to Affidavit

Industrial Relations Act 2016, s 989

Industrial Relations (Tribunals) Rules 2011, r 53

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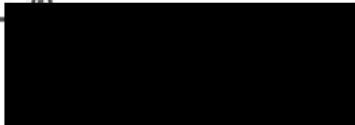
Matter details

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

Exhibit details

Name of document:	WGEA - 2024 Commonwealth public sector gender equity data
Marked:	SVD-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:	Damian Matthew Ribbon
Signature and type of witness:	 ☐ Justice of the Peace ☐ Commissioner for Declarations ☒ Lawyer
Sworn/Affirmed at [place]:	Brisbane
Date:	31/07/2026

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/ Progress and opportunity: takeaways from 2024 Commonwealth public sector gender equality data

Progress and opportunity: takeaways from 2024 Commonwealth public sector gender equality data

14 May 2026[News](#)[Media release](#)[Public Administration and Safety](#)[Data Launch](#)[For everyone](#)

WGEA's release of aggregate results from Commonwealth public sector reporting shows the sector has made significant progress in many areas critical to achieving gender equality at work.

The sector has achieved gender-balance (40:40:20) across all remuneration quartiles, on board membership including Chair roles and in almost all manager categories. 2/5 employers have a gender pay gap in the target range. Those who haven't generally have lower gaps than the private sector. Nearly every employer offers paid parental leave in addition to the government scheme and men now account for 19% of all primary carer's parental leave taken – matching the private sector after years of lagging behind.

129 Commonwealth public sector employers, employing more than 282,000 people, reported gender equality information to WGEA for the 2024 calendar year. WGEA published individual employer gender pay gaps and other information in March 2026,

but today we are releasing the aggregate results. Information for employers and the public sector is now available on the [WGEA Employer Data Explorer](#).

The employers lodged their reports in September – October 2025. From this year, Commonwealth public sector employers will submit their gender equality reports at the same time as private sector employers (April-May) and WGEA will release the public sector data with the private sector information later this year.

The Commonwealth public sector average total remuneration gender pay gap is 7.4%. For the first time employer reporting included the pay for CEOs, casual managers and APS casuals and this is included in the gender pay gap calculation. This means a direct comparison to the 2023 results is not possible. On a like-for-like basis, excluding these employees and only including employers who reported in 2023 and 2024, the public sector's gender pay gap did not change from 2023.

Detailed reporting on employer actions to prevent and respond to sexual harassment in the workplace was mandatory for Commonwealth public sector employers for the first time in this reporting period.

The new information shows employers are taking comprehensive actions to report information about sexual harassment to senior executive and to support their employees. 93% collect information on sexual harassment in the workplace and 72% have trained trauma informed support officers compared to 38% in the private sector. Employers could improve their response by focussing attention on some further actions. For example, employers could ensure the CEO and governing body sign-off on details of the organisation's policy.

WGEA's analysis of the reports shows 3 additional areas where the public sector has an opportunity to accelerate progress towards gender equality:

- using APS policies as the basis for specific organisational level strategies adapted to address the individual workplace context
- assessing recruitment and promotion processes for CEOs and top quartile earners who are still more likely to be men, despite the sector being 54% women
- improving the level of detailed analysis during a gender pay gap analysis and using the gaps identified to develop an action plan to improve equality.

Key information

- 129 Commonwealth public sector employers lodged gender equality reports to WGEA.

SVD-2

- The organisations employ 282,602 people. Of these 54.1% are women, 45.5% are men and 0.4% are non-binary.
- 38% of CEOs, 50% of Key Management Personnel, 52% of General Managers, 51% of Senior Managers and 55% of Other Managers are women.
- 64% of promotions from non-manager to manager roles were women.
- 79% of women in the public sector work full-time and 16% work part-time compared to the private sector where 42% of women work full time and 30% work part-time.
- 51% of Board members and 44% of governing body Chairs are women.
- Men are 1.4 times more likely to be in the highest earning quartile than women.
- 39% of employers have an average total remuneration gender pay gap within the target range of $\pm 5\%$, meaning there is no substantial difference between the average pay of women and men.
- 5% of employers have a gender pay gap in favour of women and 56% have a gender pay gap in favour of men.
- 50% of public sector employers have a gap below 6.0%, compared to 11.2% in the private sector.
- 73% of employers conducted a gender pay gap analysis of those:
 - 19% completed a comprehensive analysis
 - 76% took action on the results.
- 56% of employers had an organisation level policy for equal remuneration compared to 74% of private sector employers.
- 98% of employers offer paid parental leave in addition to the government scheme.
- Men account for 19% of all primary carer's parental leave taken.
- 95% of CEOs communicate expectations on safety respect and inclusion at work.
- 98% of employers have a formal policy or strategy on the prevention and response to sexual harassment. Of those:
 - 67% have their policy or strategy reviewed and approved by the CEO.

- 53% have their policy or strategy reviewed and approved by the governing body.
- 95% of employers report information on sexual harassment prevalence and response to the CEO, 82% report to the governing body and 82% report to Key Management Personnel. Of those:
 - 43% identify the risks of workplace sexual harassment.
 - 20% reported on the effectiveness of responses to reports.
 - 6% reported performance against the 7 Standards outlined by the Australian Human Rights Commission.

Commonwealth public sector gender pay gap 2024

Pay measure	Women \$	Men \$	Difference \$	Gender pay gap %
Average total remuneration	125,226	135,249	10,024	7.4
Average base salary	103,888	108,432	4,545	4.2
Median total remuneration	114,446	121,707	7,260	6
Median base salary	94,619	99,167	4,548	4.6

Source: [Workplace Gender Equality Agency](#)

Made with Flourish • Create a table

Gender composition and average total remuneration by pay quartile

Commonwealth public sector 2024

☐ Women % ☐ Men %

Remuneration quartile	Composition		Average total remuneration \$
Total Workforce	54	46	129,822
Upper quartile	46	54	197,979
Upper-middle quartile	55	45	132,831
Lower-middle quartile	58	42	105,729
Lower quartile	57	43	82,751

Source: [Workplace Gender Equality Agency](#)

Made with Flourish • [Create a table](#)

Explore more detailed data on the WGEA Employer Data Explorer →

Public sector gender equality data 2024 context

Employers with 100 or more employees are required to lodge a gender equality report with WGEA under the *Workplace Gender Equality Act 2012*. These reports cover 6 gender equality indicators (GEIs).

The 2022, [Anti-Discrimination and Human Rights Legislation Amendment \(Respect at Work\) Act](#) resulted in an amendment to the *Workplace Gender Equality Act 2012* to require Commonwealth entities and companies with 100 or more employees to report to WGEA from 2023. 3 security agencies are exempt from submitted specific data points. As a result, information for these agencies is not included in workforce composition and gender pay gap calculations.

Additional legislative reforms in 2023 required all employers to report CEO and casual manager composition and remuneration to WGEA. The inclusion of CEO

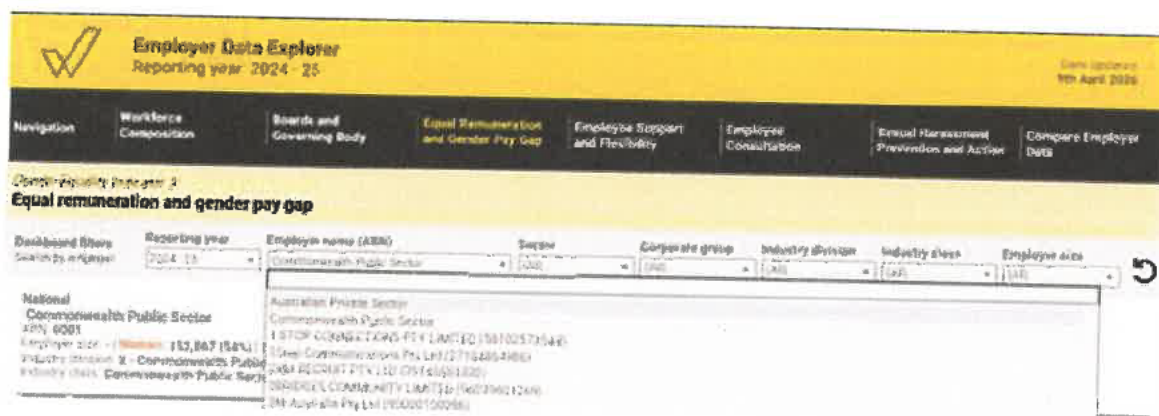
remuneration provides a more accurate representation of the gender pay gap.

Commonwealth public sector employers included CEO remuneration in their 2024 reports. As a result, WGEA has published average total remuneration gender pay gaps for individual employers and employer's average total remuneration per pay quartile for the first time.

The 2024 Commonwealth public sector information also includes gender composition and remuneration for casual Managers and a number of APS casual employees who were not previously reported.

Since the number of Commonwealth public sector employers is small, changes in the number of employers who report can cause large differences in the aggregate information for the sector. 8 employers lodged a report to WGEA as part of the Commonwealth public sector reporting program for the first time in 2024. Of these, 5 organisations were new relevant employers and 3 had previously reported under the private sector program.

Details on the sector's performance against each of the 6 Gender Equality Indicators can be found on the WGEA Employer Data Explorer. Click on the Employer name filter and select Commonwealth public sector to explore the results.





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Matter details

Applicant:

Queensland Council of Unions & Anor

v

Respondent:

State of Queensland (Office of Industrial Relations)

Exhibit details

Name of document:

Victorian Government State of the Sector Report 2025

Marked:

SVD-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:**

Damian Matthew R. GORRILL

**Signature and type of
witness:**

[Redacted signature]

☐ Justice of the Peace ☐ Commissioner for Declarations ☒ Lawyer

Sworn/Affirmed at [place]:

Brisbane

Date:

31/07/2026

Employee pay and gender pay 2025

Employee pay, conditions, pay by gender and the gender pay gap.

On this page

Key facts

- [Overall public sector workforce](#)
- [Victorian Public Service \(VPS\)](#)
- [Gender pay gap by industry](#)

Employee pay

- [How public sector pay is set](#)

Pay by gender and the gender pay gap

- [How we calculate the gender pay gap](#)
- [Distribution of salary ranges by gender and industry groups](#)
- [Victorian Public Service \(VPS\)](#)
- [Gender pay gap across VPS pay classification, based on average salary](#)
- [Median gender pay gap by occupation group](#)
- [Median gender pay gap by age group](#)

Data sets, key terms and how we prepare data

Key facts

Overall public sector workforce

At June 2025, for non-casual public sector employees (including executives) the:

- median salary is \$103,152
- median gender pay gap has reduced to 8.3% or \$9,136 (compared to 10.1% or \$10,681 in 2024)
- mean (average) salary is \$113,720
- mean (average) gender pay gap is 17.0% or \$21,936 (compared to 18.1% or \$22,363 in 2024).

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 highest pay groups compared to women.

Victorian Public Service (VPS)

At June 2025, for non-casual VPS employees (including executives) the:

- median salary is \$111,142
- median gender pay gap is 1.7% or \$1,880 (compared to 0% in 2024)
- mean (average) salary is \$121,546
- mean (average) gender pay gap is 5.6% or \$7,025 (compared to 6.7% or \$8,027 in 2024).

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

Gender pay gap by industry

The median gender pay gap varies by industry group.

In 2025, the median gender pay gaps were:

- 14.2% for creative industries, finance, transport and other industries (up from 13.5% in 2024)
- 11.9% for TAFE and other education industries (down from 14.9% in 2024)
- 10.3% for government schools (unchanged from 2024)
- 5.5% for public health care (down from 6.1% in 2024)
- 4.8% for water and land management (up from 3.4% in 2024)
- 1.7% for the Victorian public service (up from 0% in 2024).

For police and emergency services there was a very slight pay gap in favour of women (0.4% in favour of women, compared to 2.9% in favour of men in 2024).

Employee pay

How public sector pay is set

There are over 100 enterprise agreements that cover all non-executive employees in the Victorian public sector.

The agreements set employee pay, terms and conditions. They differ based on industry group, employer and occupation.

Agreements are made under the Commonwealth [Fair Work Act](#) .

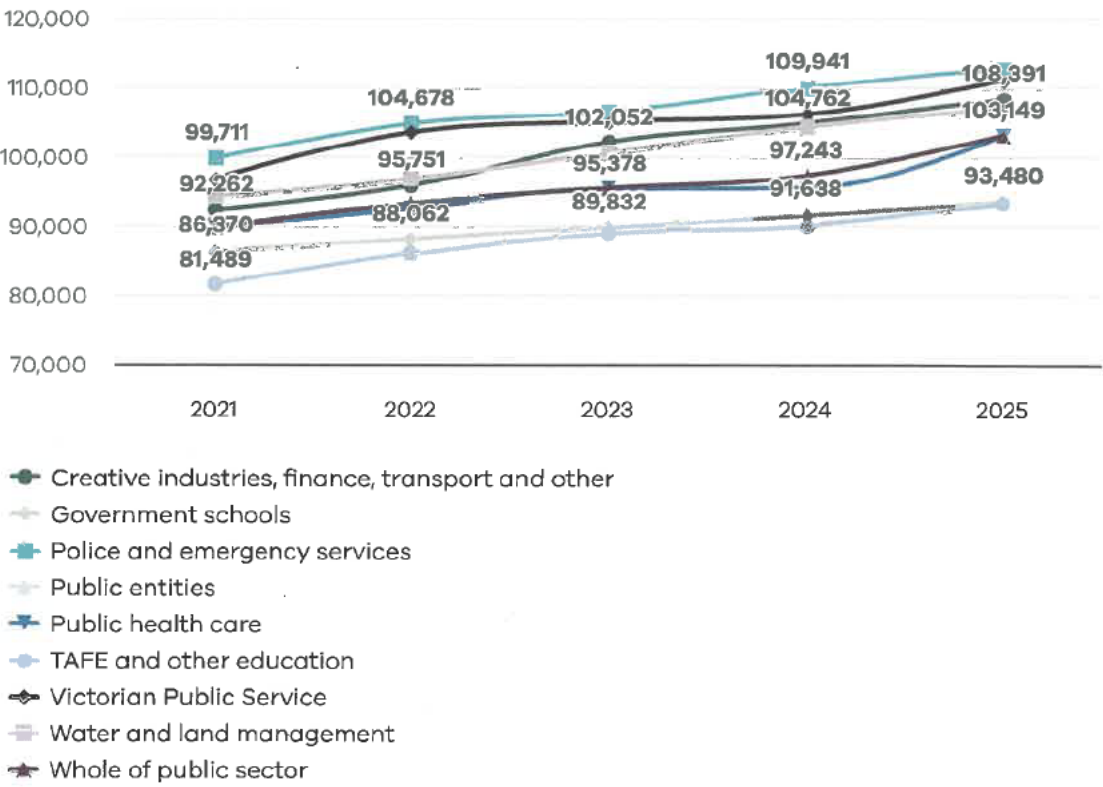
Executive remuneration is set by the Victorian Independent Remuneration Tribunal.

See data, facts and visuals on [executive pay </public-sector-data/workforce-data-state-public-sector-2025/employee-and-executive-pay-leave-and-work-arrangements/executive-pay-and-gender-pay-2025>](#).

Median annual salary of non-casual employees over time



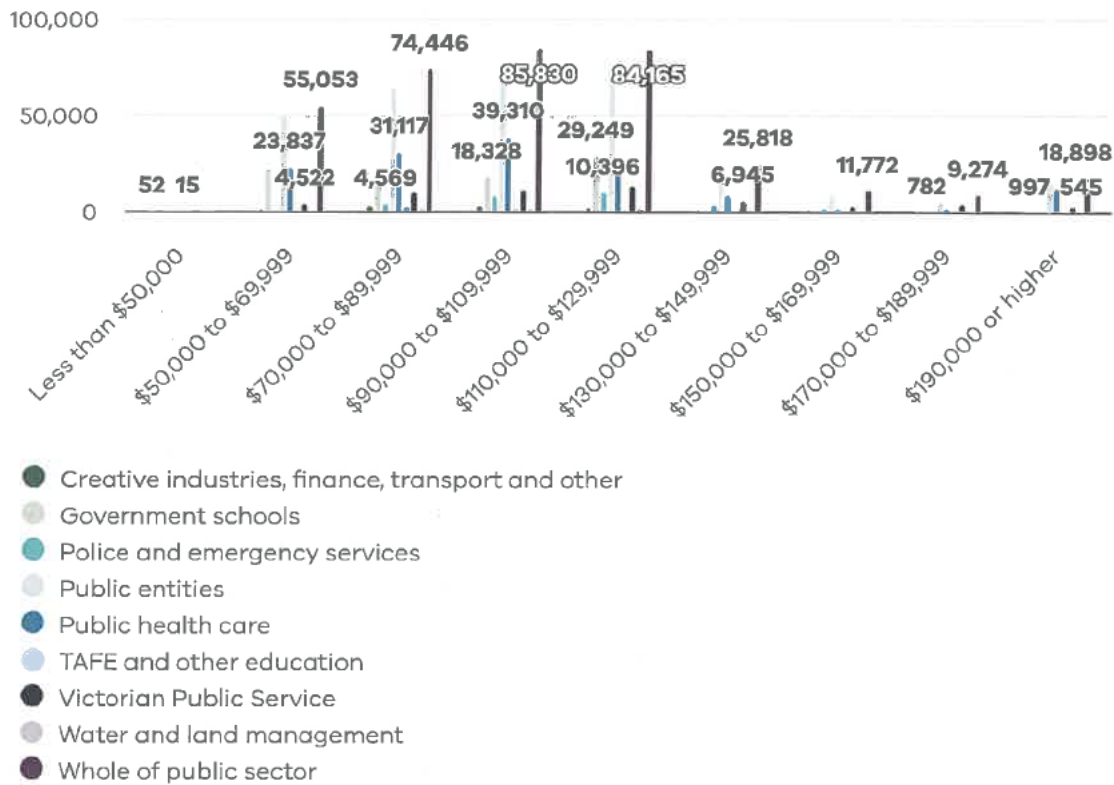
Workforce data collection 2021 to 2025



Distribution of non-casual employees by salary range



Workforce data collection 2025



Pay by gender and the gender pay gap

We use the gender pay gap (difference in pay between women and men) as one measure of workplace gender equality.

We report the average (mean) and median (middle point) gender pay gap in line with reporting from the [Commission for Gender Equality in the Public Sector](#) (CGEPS).

Our calculations may be different from CGEPS because we don't include pay data from universities and local council employees.

We work out the gender pay gap using:

- mean pay or average pay gap — the lowest and highest salaries have more influence, which increases the pay gap because a small number of men earn very high salaries.
- median pay or middle point of the pay gap — this is less influenced by extreme salaries or outliers and gives us a better idea of the gap for most employees.

How we calculate the gender pay gap

To work out the median pay gap for the overall public sector workforce we:

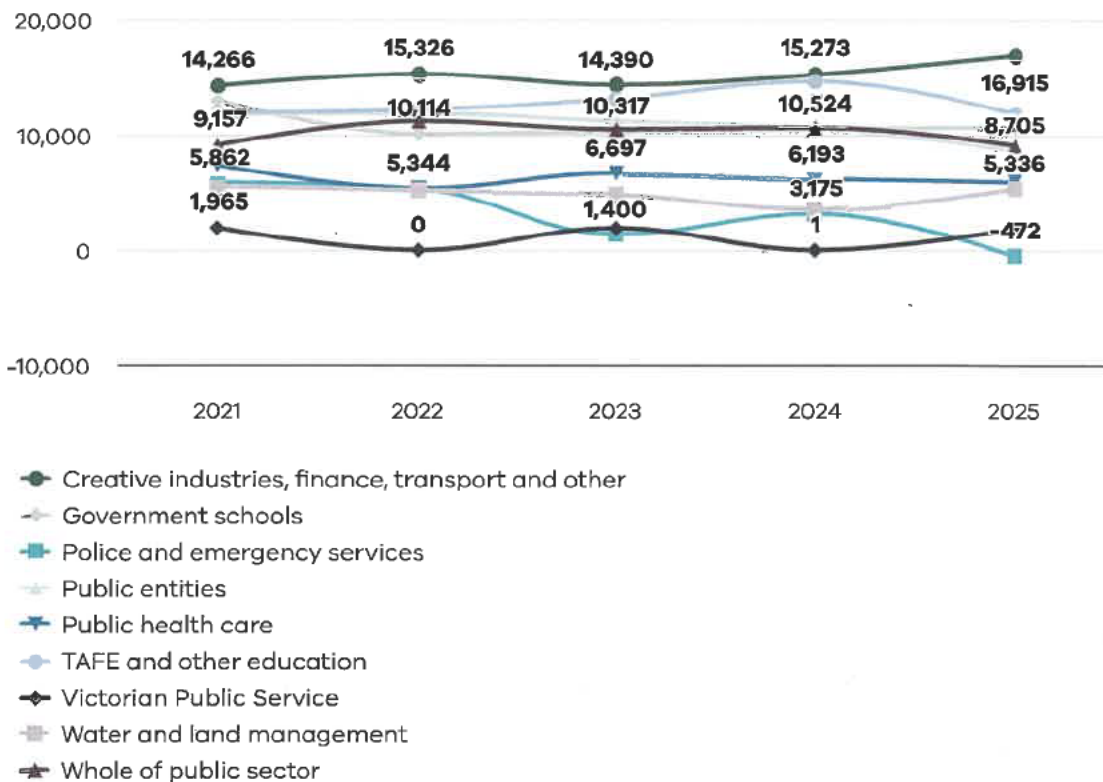
1. Find the median full-time equivalent pay for men (\$110,333) and women (\$101,197).
2. Calculate the difference between those 2 numbers (\$110,333 minus \$101,197 equals \$9,136).
3. Express the difference as a percentage of the median salary for men (\$9,136 is 8.3% of men's median salary of \$110,333).
4. Based on this approach, the median pay gap for the public sector is 8.3%.

The same approach is used to work out the mean pay gap using the average (mean) full-time equivalent pay for men and women.

Median gender pay gap



Workforce data collection 2021 to 2025



Distribution of salary ranges by gender and industry groups

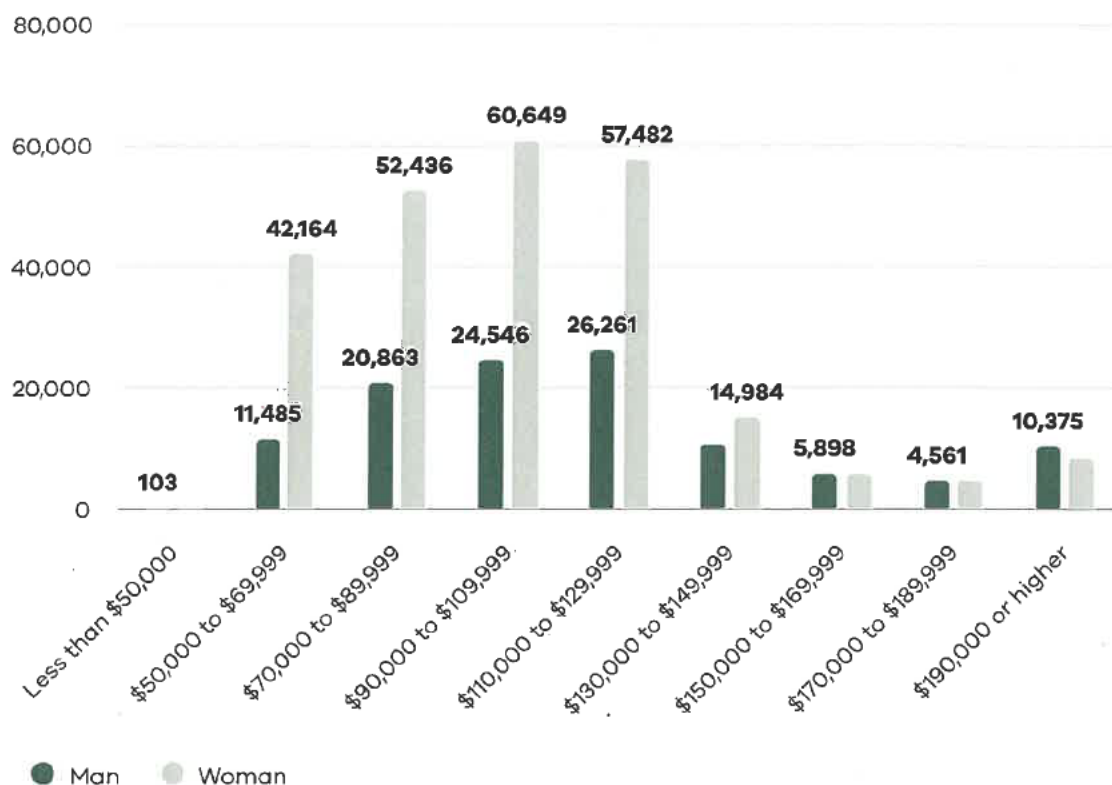
The distribution of men and women across salary ranges varies across industries.

The chart below shows a breakdown of gender distribution across \$20,000 salary ranges. ^{SMD 3}

Distribution of salary ranges by gender and industry



Workforce data collection 2025

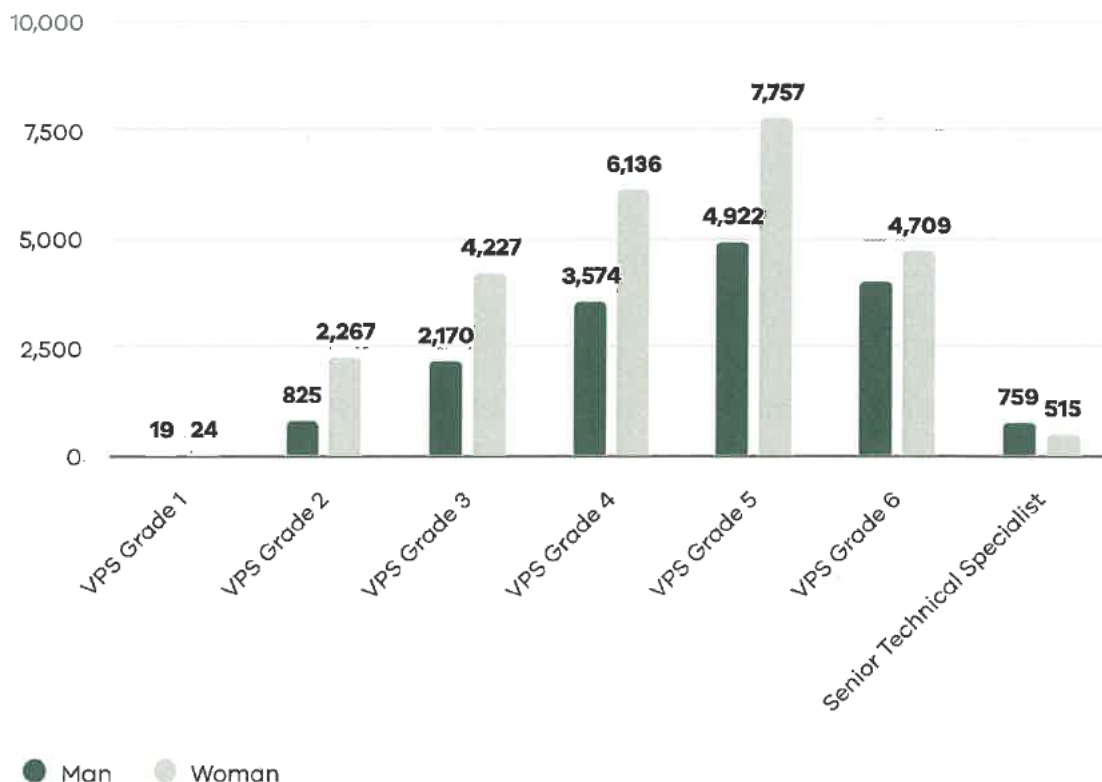


Victorian Public Service (VPS)



Distribution of VPS pay grades by gender

Workforce data collection 2025



Gender pay gap across VPS pay classification, based on average salary

The chart below shows the average (mean) gender pay gap across VPS grades.

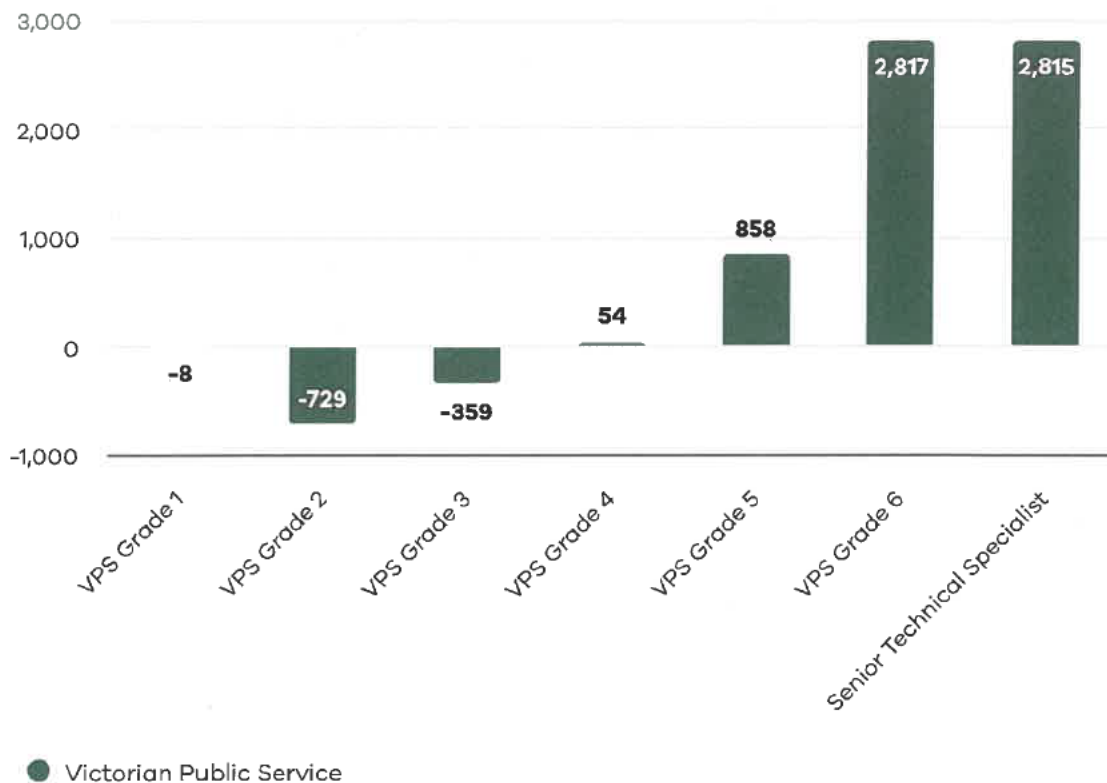
A positive number indicates a gender pay gap in favour of men. A negative number indicates a gender pay gap in favour of women.

The higher VPS grades have a gender pay gap in favour of men, whereas lower VPS grades have a gender pay gap in favour of women.

SVD-3

Gender pay gap across each pay grade - mean or average pay 2025

Workforce data collection 2025



Median gender pay gap by occupation group

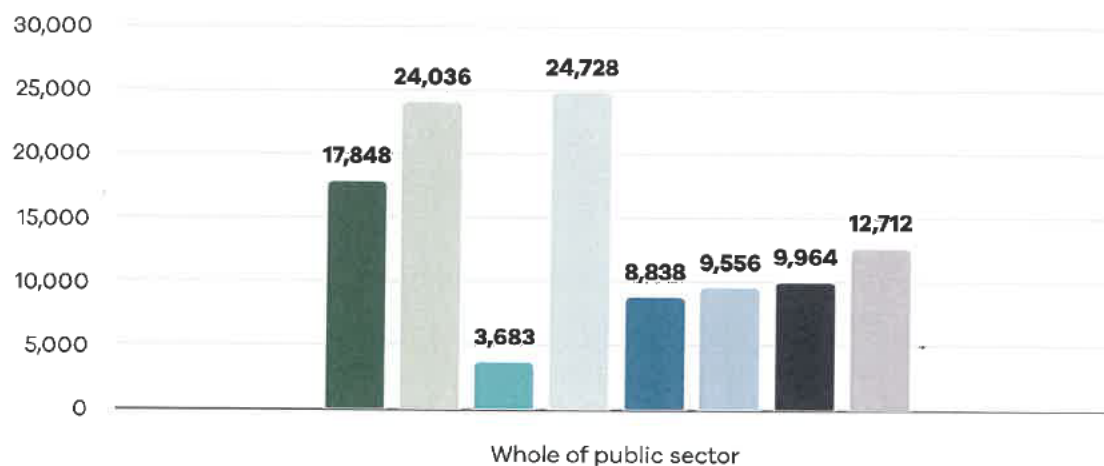
The chart below shows the median (middle point) gender pay gap for different occupation groups.

A positive number indicates a gender pay gap in favour of men. A negative number indicates a gender pay gap in favour of women.

Gender pay gap by major occupation group



Workforce data collection 2025



- Clerical and Administrative Workers
- Community and personal services workers
- Labourers
- Machinery operators and drivers
- Managers
- Professionals
- Sales workers
- Technicians and trade workers

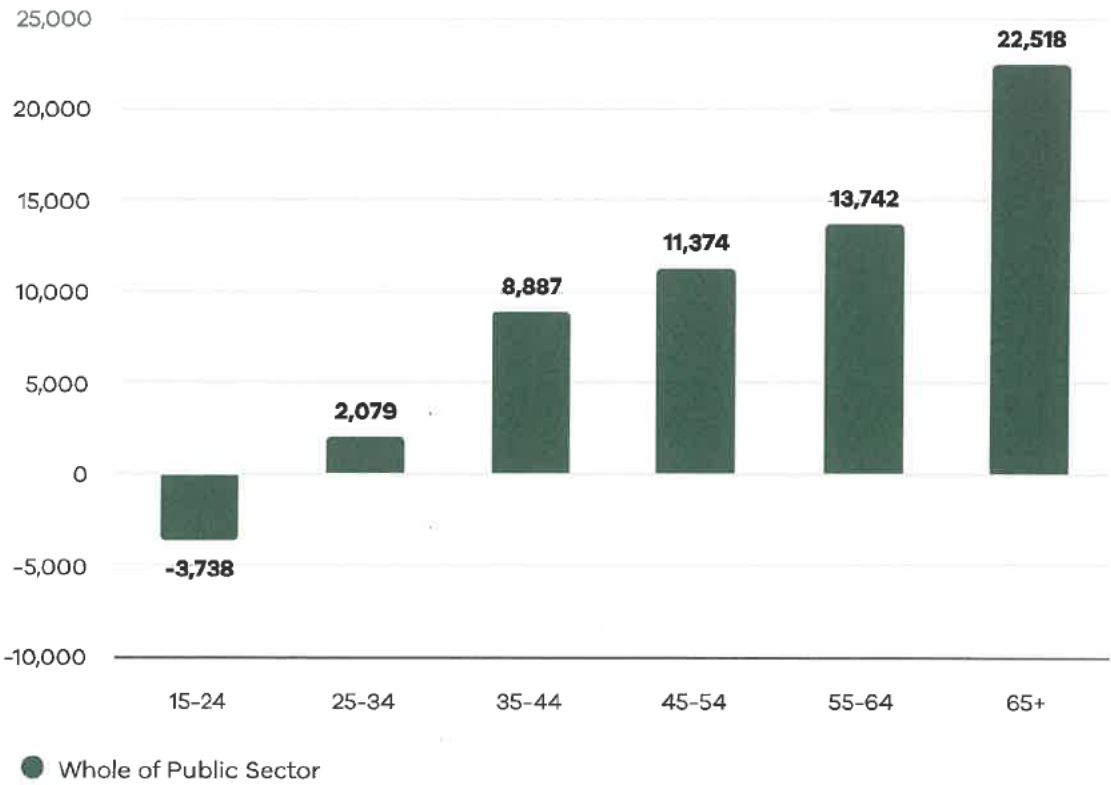
Median gender pay gap by age group

The chart below shows the median (middle point) pay gap for different age groups.

A positive number indicates a gender pay gap in favour of men. A negative number indicates a gender pay gap in favour of women.

Gender pay gap by age

Workforce data collection 2025



Data sets, key terms and how we prepare data

- [Workforce data sets 2025 </public-sector-data/workforce-data-state-public-sector-2025/data-sets-and-results-2025/workforce-data-sets-2025>](/public-sector-data/workforce-data-state-public-sector-2025/data-sets-and-results-2025/workforce-data-sets-2025)
- [Key terms and how we prepare our data </public-sector-data/workforce-data-state-public-sector-2025/data-sets-and-results-2025/key-terms-and-how-we-prepare-our-data-2025>](/public-sector-data/workforce-data-state-public-sector-2025/data-sets-and-results-2025/key-terms-and-how-we-prepare-our-data-2025)

Updated 27 March 2026

Contact us

2 Lonsdale Street, Melbourne VIC 3000



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Matter details

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

Exhibit details

Name of document:	Queensland Public Sector Gender pay equity dashboard 2025
Marked:	SVD-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:	Damian Matthew R106 Dru
Signature and type of witness:	 ☐ Justice of the Peace ☐ Commissioner for Declarations ☒ Lawyer
Sworn/Affirmed at [place]:	Brisbane
Date:	31/07/2026

Gender pay equity dashboard 2025

Advancing gender pay equity is a key priority under the Public Sector Act 2022. This dashboard supports that commitment by providing insights into gender equity, gender equality and the gender pay gap.



68.91%

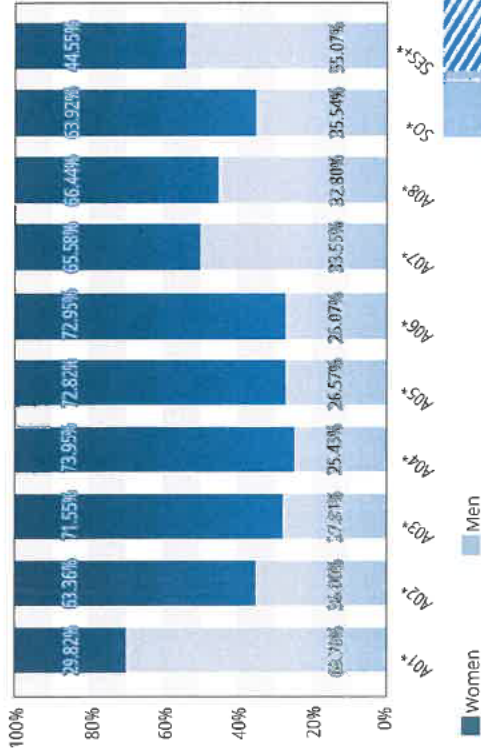


31.09%

101,423

At June 2025, 68.91% of Queensland's 326,271 public servants identified as women.

Gender disparity across levels



While women occupy more than 70% of roles at the A03-A06 level, this proportion drops in the higher classifications. The proportion of women in SES and equivalent roles falls to 44.55%.

*salary equivalent

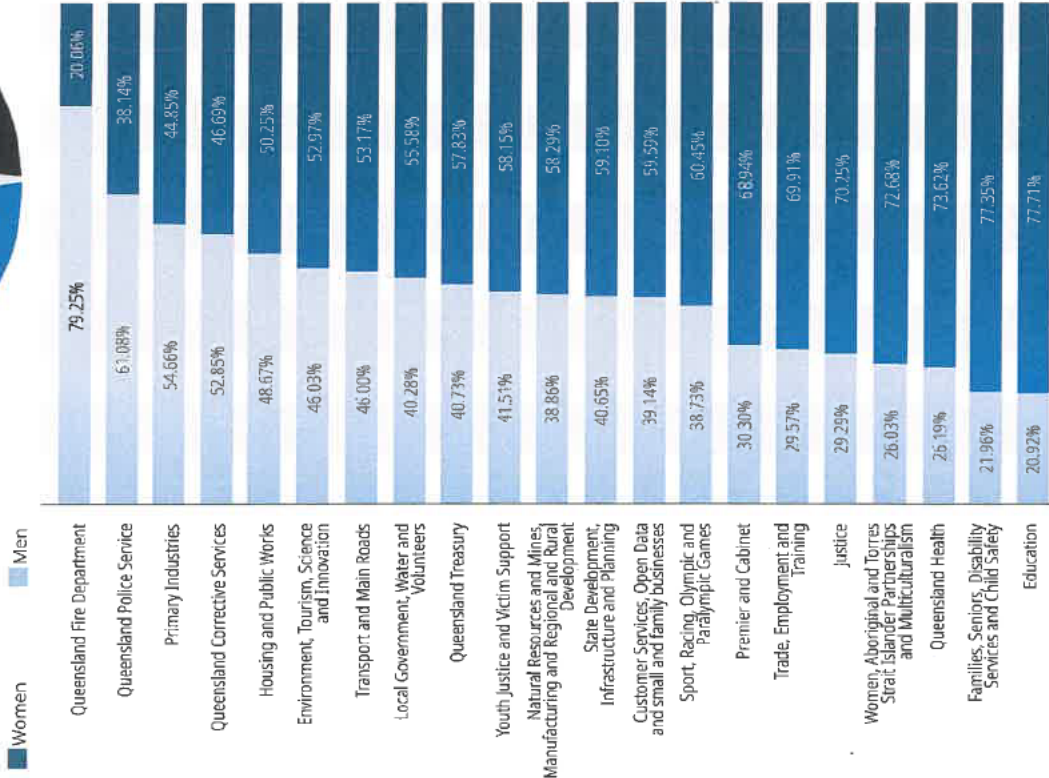


Please note

- All data sourced from Minimum Obligatory Human Resource Information June 2025
- People who identified their gender as non-binary or another term, or who did not disclose, have been withheld from these graphs. These responses were too few to include meaningfully.

Workforce composition

The highest representation of women is in education, health, and the Department of Family, Seniors, Disability Services and Child Safety.



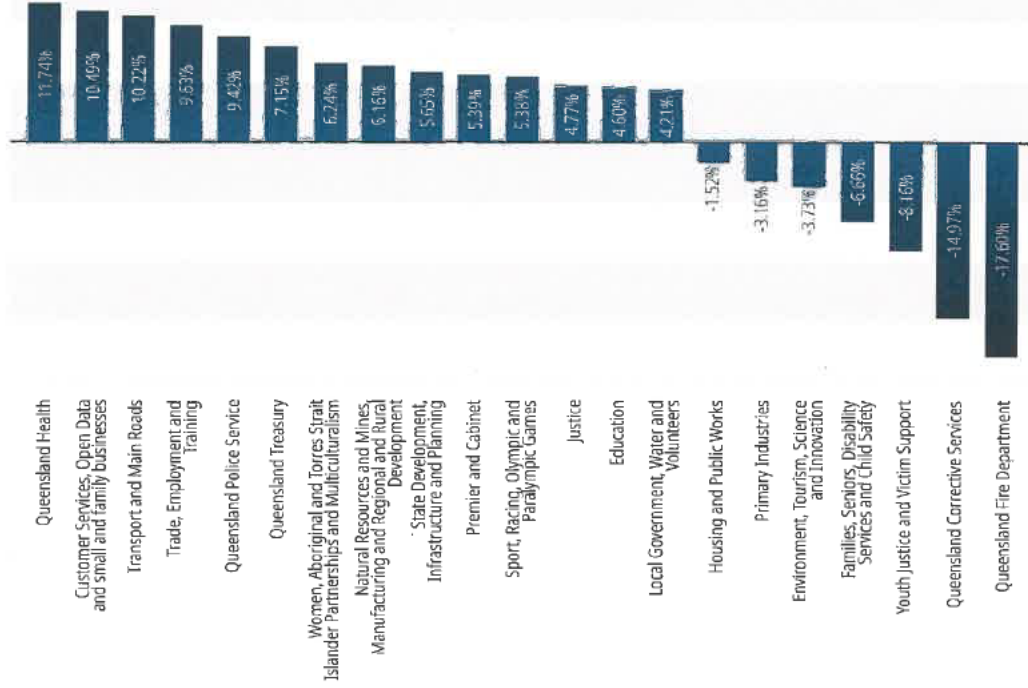
Women in leadership classifications

The Queensland public sector has exceeded its 50% target for women in leadership, reaching 56.02% in June 2025. While only 39.60% of applicants for executive roles are women, they make up 58.13% of successful appointments.



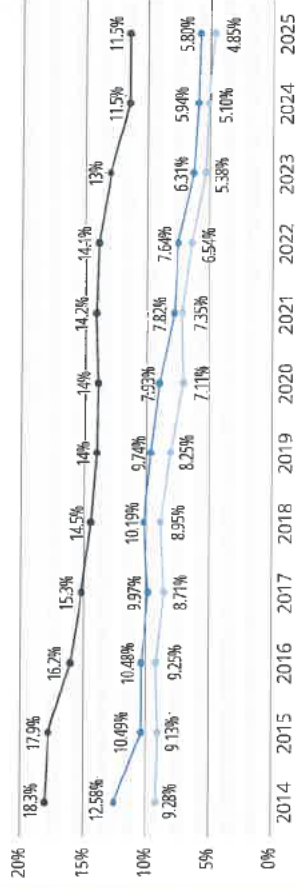
Gender pay gap by department

The gender pay gap is largest in the Queensland Fire Department and it also represents an organisation where women earn more than men. In contrast, the Queensland Health workforce is predominantly women (73.62%), but has the lowest gender pay gap of 11.74%.



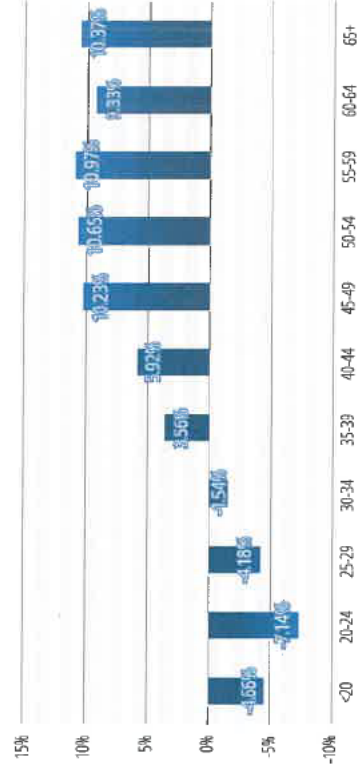
Gender pay gap (as if working full-time)

The gender pay gap calculates the difference between the average pay of men and women across the workforce. In Queensland's public sector, the gap has narrowed to 4.85%, significantly below the national average of 11.5%, showing strong progress in gender equality efforts.



Gender pay gap by age

The pay gap commences at 35-39, and continues to grow until the 55-59 age group, drops in the 60-64 age gap, before increasing again.



Learn more

The gender pay gap is caused by a combination of factors including discrimination in hiring, lower wages in female-dominated industries and limited workplace flexibility. Additionally, women are more likely to work part-time and take on unpaid caring responsibilities, which can impact their earning potential.

To read our full report or to see detail on the gender pay equity for people who identified their gender as non-binary or another term visit psc.qld.gov.au and search 'gender pay equity dashboard' or scan the QR code on the right.

All information is correct as of 14 October 2025.





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Matter details

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

Exhibit details

Name of document:	Deputy Premier letter to Ms Jacqueline King dated 20 March 2025
Marked:	SVD-5
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:	Damian Matthew Roberts		
Signature and type of witness:	 ☐ Justice of the Peace ☐ Commissioner for Declarations ☒ Lawyer		
Sworn/Affirmed at [place]:	Brisbane		
Date:	31/07/2026		



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

1 William Street
Brisbane Queensland 4000
PO Box 15009
City East Queensland 4002
Telephone: +61 7 3719 7100
Email: deputy.premier@ministerial.qld.gov.au
Email: industrialrelations@ministerial.qld.gov.au

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.

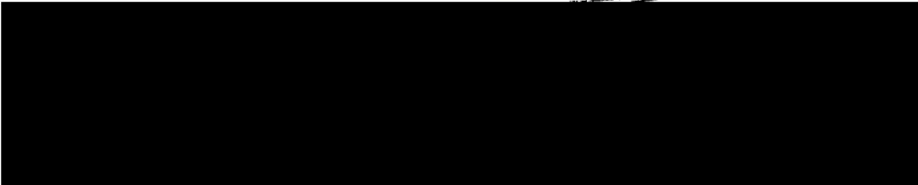
The cost of the maximum headline wage increase, including the CUA mechanism if triggered, will be met on a state-share basis. Agencies will not be funded for initiatives outside of Public Sector Wages Policy and will need to ensure that such initiatives align with this Government's commitments.

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.



JARROD BLEIJIE MP
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

- This form is to be used when attaching exhibits to an affidavit. Exhibits are documents mentioned in the affidavit and used with the affidavit. Attach one Certificate per exhibit.
- 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.
- 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 & Anor
	v
Respondent:	State of Queensland (Office of Industrial Relations)

Exhibit details

Name of document:	Directive 2012-12 State Wage Case and Certified Agreements
Marked:	SVD-6
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:	Damian Matthew Ribeiro
Signature and type of witness:	 ☐ Justice of the Peace ☐ Commissioner for Declarations ☒ Lawyer
Sworn/Affirmed at [place]:	Brisbane
Date:	31/07/2026



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.