

FAIR WORK COMMISSION

APPEAL BOOK

Appellant: Mrs Holly Tegan Dahm

Respondent: State Of Queensland Acting Through Queensland Treasury

Original matter: C2026/9566

Decision appealed: [2026] FWC 3088 (PR813237), 26 August 2026

Notice of Appeal: 27 August 2026

Representative: Riki Lee Dahm

Prepared for electronic lodgment with the Fair Work Commission and contemporaneous service on the Respondent.

Related references: CBA WS Deloitte AU620871X | OCO PID-2025-800051

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GROUND-TO-APPEAL-BOOK MAP

Ground 1 - statutory gateway / national-system status.

Decision: 4-10; Appellant Form F9: 14-20; Respondent F9A Schedule 1: 71-76.

Ground 2 - Queensland referral versus independent Commonwealth power.

Decision: 4-10; Respondent F9A Schedule 1: 71-76.

Ground 3 - Melbourne Corporation / unidentified statutory operation.

Decision: 4-10; Respondent F9A Schedule 1 constitutional objection: 71-76.

Ground 4 - State remedies / ss 725 and 732.

Decision: 4-10; Appellant Form F9: 14-20; Attachment 7: 59-60; Respondent F9A Schedule 1: 71-76.

24 July 2026 Appellant lodgment package.

The Appellant's lodgment/service email is at 11-13, followed immediately by the signed Form F9 and Attachments 1-7 at 14-60.

Papers basis / first-instance record.

Riki Lee Dahm's 14 August 2026 correspondence confirms reliance on the Form F9 and Attachments 1-7 lodged and served on 24 July 2026; nothing new was lodged or relied upon and the email made no further submissions: 160-163.

Appeal-book scope.

This book separates the Appellant's 24 July 2026 lodgment package from the Respondent's later Form F9A and supporting material. It contains the decision, the complete Appellant package, the Respondent package, and the material identifying the papers basis. It excludes a separate authorities bundle and post-decision merits evidence.



Fair Work Act 2009
s.773—
Termination of

DECISION

employment

Holly Tegan Dahm

v

State Of Queensland Acting Through Queensland Treasury
(C2026/9566)

COMMISSIONER SIMPSON

BRISBANE, 26 AUGUST 2026

Application to deal with an unlawful termination dispute - Jurisdictional objection raised - Applicant is a state system employee – Objection Upheld – Application dismissed.

[1] On 24 July 2026, Mrs Holly Tegan Dahm (**the Applicant / Mrs Dahm**) made an application to the Fair Work Commission (**the Commission**) under s.773 of the *Fair Work Act 2009* (Cth) (**the Act**) to deal with an unlawful termination dispute. Mrs Dahm stated that she had been dismissed from her employment with the State of Queensland Acting Through Queensland Treasury (**the Respondent**) on 5 December 2025.

[2] In its *Form F9A – Response to Unlawful Termination Application*, the Respondent objected to the application contending that the application was lodged out of time, and that it is a state system employer. Therefore, the Respondent asserted that the Commission lacked jurisdiction to deal with the application.

[3] I listed the matter for conference on 14 August 2026. At the conference both parties agreed for the Commission to determine the jurisdictional objections on the papers on the basis of the material already filed.

Relevant Legislation

[4] The first question before the Commission is whether the Respondent is not a national system employer, and therefore, whether Mrs Dahm is protected by the unlawful termination provisions in the Act.

[5] Section 14 of the Act defines national system employer as follows:

“14 Meaning of national system employer

(1) A national system employer is:

- (a) a constitutional corporation, so far as it employs, or usually employs, an individual; or
- (b) the Commonwealth, so far as it employs, or usually employs, an individual; or
- (c) a Commonwealth authority, so far as it employs, or usually employs, an individual; or
- (d) a person so far as the person, in connection with constitutional trade or commerce, employs, or usually employs, an individual as:
 - (i) a flight crew officer; or
 - (ii) a maritime officer; or
 - (iii) a waterside worker; or
- (e) a body corporate incorporated in a Territory, so far as the body employs, or usually employs, an individual; or
- (f) a person who carries on an activity (whether of a commercial, governmental or other nature) in a Territory in Australia, so far as the person employs, or usually employs, an individual in connection with the activity carried on in the Territory.

Note 1: In this context, ***Australia*** includes Norfolk Island, the Territory of Christmas Island and the Territory of Cocos (Keeling) Islands (see the definition of ***Australia*** in section 12).

Note 2: Sections 30D and 30N extend the meaning of ***national system employer*** in relation to a referring State.

Particular employers declared not to be national system employers

- (2) Despite subsection (1) and sections 30D and 30N, a particular employer is not a national system employer if:
 - (a) that employer:
 - (i) is a body established for a public purpose by or under a law of a State or Territory, by the Governor of a State, by the Administrator of a Territory or by a Minister of a State or Territory; or
 - (ii) is a body established for a local government purpose by or under a law of a State or Territory; or
 - (iii) is a wholly-owned subsidiary (within the meaning of the *Corporations Act 2001*) of, or is wholly controlled by, an employer to which subparagraph (ii) applies; and

(b) that employer is specifically declared, by or under a law of the State or Territory, not to be a national system employer for the purposes of this Act; and

(c) an endorsement by the Minister under paragraph (4)(a) is in force in relation to the employer.

(3) Paragraph (2)(b) does not apply to an employer that is covered by a declaration by or under such a law only because it is included in a specified class or kind of employer.”

[6] The second question before the Commission is whether the Respondent is a state system employer, as Chapter 6, Part 6-4 of the Act does not apply to the State of Queensland because of the implied limitation on Commonwealth legislative power with respect to State system employees, a limitation also reflected in the *Fair Work (Commonwealth Powers) and Other Provisions Act 2009* (Qld) (**the Qld Referral Act**).

[7] Section 5 of the Qld Referral Act sets out the matters that are referred to the Commonwealth.

[8] Section 6 of the Qld Referral Act sets out the matters excluded from the reference including:

“(d) matters relating to public sector employees and employers...”

[9] The third question before the Commission is whether the Applicant is barred from bringing this application pursuant to ss.725 and 732 of the Act, because of having made other applications in relation to her dismissal.

[10] The fourth question before the Commission, if the other jurisdictional arguments fail, is whether the Commission should extend time as the Applicant has not made her application within 21 days after her employment was terminated.

Submissions

Applicant

[11] The Applicant submits that her last day at work was 24 March 2025 as she has remained medically incapacitated since that date.

[12] The Applicant submits that the incapacity continued throughout the 21-day filing period and that she remains medically certified.

[13] The Applicant submits that the functional effects of her incapacity materially impaired her ability to organise records, identify correct legal pathways, obtain assistance, and prepare and lodge the application within time.

[14] The Applicant submits that she became aware of her termination on 5 December 2025 and that the delay was the result of incapacity rather than a late awareness.

[15] The Applicant submits that she did not accept the termination and with assistance, took protective steps through State industrial processes. The Applicant submits that taking these steps do not establish that she possessed the sustained functional capacity to distinguish between the State and Federal Jurisdictions.

[16] The Applicant submits that the delay has caused no material, forensic or evidentiary prejudice to the Respondent.

[17] The Applicant submits that she was employed directly by the State of Queensland through the Queensland Treasury as a Queensland public service employee and is not a national system employee.

[18] Therefore, the Applicant submits that she is not entitled to make a s.365 application in relation to the termination of her employment.

[19] The Applicant submits that she filed a matter with the Queensland Industrial Relations Commission (**QIRC**) regarding the pre-termination disciplinary process. This matter was dismissed on 13 November 2025. It did not determine any issue arising from the termination or whether the termination contravened Part 6-3 of the Act.

[20] The Applicant filed a Form F89 with the QIRC on 24 December 2025 regarding the termination of her employment. The Applicant submits that she sought review of the termination and consequential relief available under the State industrial jurisdiction. The Applicant submits that the QIRC Registry did not accept the document for filing and that no substantive proceeding concerning the termination was commenced or determined.

[21] The Applicant subsequently filed a Form 13 on 23 December 2025 concerning payment of an asserted long-service-leave entitlement arising upon termination. The Applicant submits that the QIRC Registry did not accept the document for filing and that no substantive determination was made concerning that entitlement.

[22] The Applicant then appealed the decisions to not accept the Form 13 and Form 89 for filing. The Supreme Court proceeding BS2985/26 concerns judicial review of the decisions not to accept the Form 13 and Form 89 for filing and associated administrative conduct. The Applicant submits that it does not seek to determine whether the termination contravened Part 6-4 of the Act.

[23] The Applicant submits that the Form 89 was not accepted for filing on the basis that the termination decision as not appealable under the *Public Sector Act 2022* (Qld).

[24] The Applicant submits that the Form 13 concerned only an asserted entitlement to long-service leave resulting from termination.

[25] The Applicant submits that by operation of s.733 of the Act, it was not an application or complaint made in relation to the dismissal for the purposes of Subdivision B of Division 3 of Part 6-1 of the Act.

[26] The Applicant further submits that no tribunal or court has determined whether her employment was terminated for a reason prohibited by s.772 of the Act.

[27] The Applicant submits that the decision for termination was based on substantiated allegations. The Applicant notes that in determining termination as the disciplinary penalty, the Respondent relied upon her non-response, non-engagement in the disciplinary process, absence of submissions, alleged lack of remorse, alleged lack of insight, and alleged failure to accept responsibility.

[28] The Applicant submits that those matters arose from her medically certified inability to participate and were relied upon in determining termination as the disciplinary penalty.

Respondent

[29] The Respondent submits that the Applicant has not made her application within 21 days after her employment was termination and there are no other exceptional circumstances that warrant an extension of time being granted.

[30] The Respondent submits that further, or in the alternative, Chapter 6 Part 6-4 of the Act does not apply to the State of Queensland because of the implied limitation on Commonwealth legislative power with respect to State system employees, the Melbourne Corporation Principle, a limitation reflected in the Qld Referral Act. The Respondent notes that s.6 specifically excludes from matters referred to the Commonwealth Parliament those relating to public sector employees and employers.

[31] The Respondent submits that the Melbourne Corporation Principle provides that the Commonwealth cannot, by exercise of its legislative power, significantly impair, curtail or weaken the capacity of the states to exercise their constitutional powers and functions, be that legislative, executive or judicial or significantly impair, curtail or weaken the actual exercise of those powers and functions.ⁱ

[32] The Respondent relies on the findings of the Full Bench in *AWU v SoQ*, where it was held that an order by the Commission pursuant to ss.786 to 787 of the Act requiring the State of Queensland to consult with the Australian Workers' Union of Employees about the number and identity of employees to be dismissed in circumstances of redundancy, would interfere with the exercise of the constitutional power of the State of Queensland in a significant manner.ⁱⁱ

[33] The Respondent submits that noting the decision in *AWU v SoQ*, if either the Federal Court or the Federal Circuit and Family Court of Australia made an order pursuant to s.545 of the Act, including to reinstate the Applicant, or pay the Applicant a pecuniary penalty, this would interfere with the Respondent's exercise of State constitutional power in a significant manner.

[34] It is further submitted that the limitation of the Commonwealth's industrial relations power over Queensland State employees is also reflected in the Qld Referral Act which by s.6 specifically excludes from matters referred to the Commonwealth Parliament those relating to Queensland public sector employees and employers.

[35] The *Industrial Relations Act 2016* (Qld) (**IR Act**) is a prescriptive, industrial relations legislative scheme intended to cover the field in relation to industrial relations matters concerning Queensland public sector employees. In circumstances where Ms Damn may, by virtue of being a dismissed Queensland public sector employee, have had standing to lodge an unfair dismissal application or general protections application in the QIRC pursuant to the IR Act, it would be an abuse of process and inconsistent with the intended purpose of the IR Act for it to cover the field in respect of Queensland public sector employment, for the Applicant also to have concurrent standing under Part 6-4 of the Act.

[36] On that basis alone, the Respondent submits that the Applicant's application is entirely without merit and cannot succeed.

[37] The Respondent submits that further, or in the alternative, the Applicant has contended in her application that she has made other applications in relation to her dismissal in the Supreme Court of Queensland and the Industrial Court of Queensland. Therefore, the Respondent submits that pursuant to ss.725 and 732 of the Act, the Applicant is barred from making this application.

[38] The Respondent submits that as the Commission does not have jurisdiction to deal with the application for the reasons details above, the Respondent does not propose to provide a response to the allegations made by the Applicant in her application.

[39] However, the Respondent does deny any and all allegations that it engaged in conduct that contravened Part 6-4 of the Act. The Respondent submits that it reserves its rights to make any further submissions regarding this point if the Commission does not accept the Respondent's jurisdictional objections to the application.

[40] The Respondent seeks that the application be dismissed for want of jurisdiction.

Consideration

[41] Section 6 of the Qld Referral Act specifically excludes from matters referred to the Commonwealth Parliament those relating to public sector employees and employers.

[42] Ms Damn by virtue of being a dismissed Queensland public sector employee, would have had standing to lodge an unfair dismissal application or general protections application in the QIRC pursuant to the *Industrial Relations Act 2016* (Qld).

[43] The decision in *AWU v SoQ* is also relevant to the facts here. An order in the Applicant's favour in connection with this application in the Commonwealth jurisdiction would impair, curtail or weaken the capacity of the State of Queensland to exercise its constitutional powers and functions.

Conclusion

[44] For the reasons set out above this application is beyond the jurisdiction of the Commission and is dismissed for that reason. As I have made that finding it is unnecessary to determine the other jurisdictional objections made by the Respondent.



COMMISSIONER

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<PR813237>

ⁱ *Australian Workers' Union of Employees, Queensland v State of Queensland (Department of Communities, Child Safety and Disability Services)* [2014] FWCFB 5546, [20] ('*AWU v SoQ*').

ⁱⁱ *Ibid* [36].

Form F9 | Holly Tegan Dahm v State of Queensland acting through Queensland Treasury | s 773 Fair Work Act 2009 | CBA WS Deloitte AU620871X | OCO PID-2025-800051

From hollydahm@proton.me <hollydahm@proton.me>

To lodge@fwc.gov.au, CSPCaseManagement@fwc.gov.au, gpt@fwc.gov.au

CC rikidahm@proton.me, rhondaannknyvett@proton.me, humanresources@treasury.qld.gov.au, pidcoordinator@treasury.qld.gov.au

Date Friday, July 24th, 2026 at 5:35 PM

Dear Registry,

Please find attached my signed **Form F9 – Application for the Fair Work Commission to Deal with an Unlawful Termination Dispute** under s 773 of the Fair Work Act 2009, dated 24 July 2026, together with the following supporting documents:

- **Attachment 1** – Queensland Treasury medical certification, approved sick leave and Australian Retirement Trust (formerly QSuper) Income Protection records.
- **Attachment 2** – 16 September 2025 Show Cause Notice.
- **Attachment 3** – 22 September 2025 Medical Certificate (Dr Rory Compton).
- **Attachment 4** – 5 December 2025 Termination Decision.
- **Attachment 5** – 29 December 2025 Specialist Report (Dr Robyn Cheuk).
- **Attachment 6** – Continuing Medical Certificates dated 31 March 2026 and 29 May 2026.
- **Attachment 7** – Queensland Industrial Relations Commission email dated 17 October 2025 recording my medical circumstances and placing Matter PSA/2025/205 into abeyance pending advice that I was fit to proceed.

The application concerns the termination of my employment by the **State of Queensland acting through Queensland Treasury** on **5 December 2025**.

For identification and complete disclosure, this correspondence refers to the following related protected disclosure matters:

- Commonwealth Bank of Australia Whistleblower Service (administered by Deloitte) Reference **AU620871X**; and
- Office of the Commonwealth Ombudsman Protected Disclosure Reference **PID-2025-800051**.

Those references identify related protected disclosure matters forming part of the surrounding factual and procedural chronology. The prohibited reason relied upon in the attached Form F9 is **physical or mental disability**.

For the avoidance of doubt, **Holly Tegan Dahm** is the Applicant in this proceeding. **Riki Lee Dahm** is the Applicant's sole representative for this Fair Work Commission matter and is also the nominated payer of the application fee.

Holly Tegan Dahm, Riki Lee Dahm and Rhonda Ann Knyvett are joint protected disclosers in relation to protected disclosure references AU620871X and PID-2025-800051. Riki Lee Dahm and Rhonda Ann Knyvett are copied to this correspondence solely in that capacity. Neither is a party to this Fair Work Commission proceeding by reason only of being copied to this email.

The Respondent, **State of Queensland acting through Queensland Treasury**, is copied for service through the Queensland Treasury Human Resources inbox at humanresources@treasury.qld.gov.au, for the attention of the Chief Human Resources Officer.

This email, together with the attached signed Form F9 and Attachments 1 to 7, constitutes service of those documents on the

Respondent at the same time they are lodged with the Fair Work Commission.

The application fee is to be paid by credit card. The nominated payer is:

Riki Lee Dahm

Phone: 0424 161 433

Email: rikidahm@proton.me

Please contact the nominated payer through the Commission's secure payment process.

I respectfully request written confirmation of:

1. Receipt of the signed Form F9 and Attachments 1 to 7.
2. The recorded date and time of lodgment.
3. The allocated Fair Work Commission matter number.
4. The status of payment processing.
5. Confirmation that service of the attached documents on the Respondent has been noted from this correspondence, if applicable.
6. Any further administrative requirement.

All correspondence, notices and directions concerning this proceeding should be sent in writing by email to both me and my representative.

Kind regards,

Holly Tegan Dahm

Applicant

Mobile: 0401 219 842

Email: hollydahm@proton.me

Representative: Riki Lee Dahm

Phone: 0424 161 433

Email: rikidahm@proton.me

Related References (for identification only)

Queensland Treasury Employee No.: **1452279**

Australian Retirement Trust (formerly QSuper) Income Protection Claim: **CLM-315008**

Commonwealth Bank of Australia Whistleblower Service (Deloitte): **AU620871X**

Office of the Commonwealth Ombudsman Protected Disclosure: **PID-2025-800051**

This correspondence is sent on behalf of the joint protected disclosers **Holly Tegan Dahm, Riki Lee Dahm and Rhonda Ann Knyvett** in relation to the protected disclosure references identified above. That statement does not alter the parties to, or representation in, this Fair Work Commission proceeding.

12.46 MB 9 files attached

06_Attachment_6_Continuing_Medical_Certificates.pdf 133.48 KB

07_Attachment_7_QIRC_Abeyance_Email.pdf 203.42 KB

05_Attachment_5_Dr_Robyn_Cheuk_Specialist_Report.pdf 208.22 KB

03_Attachment_3_Dr_Rory_Compton_Medical_Certificate.pdf 1.47 MB

04_Attachment_4_Termination_Decision.pdf 1.83 MB

00_Holly_Tegan_Dahm_Form_F9_Unlawful_Termination_Application_2026-07-24.pdf 163.44 KB

01_Attachment_1_Treasury_Medical_and_ART_Records.pdf 2.34 MB

02_Attachment_2_Show_Cause_Notice.pdf 6.13 MB

publickey - hollydahm@proton.me - 0x3CEBE436.asc 889 bytes

Form F9 – Application for the Fair Work Commission to deal with an unlawful termination dispute

Fair Work Act 2009, s. 773, Fair Work Commission Rules 2024, rule 71

This is an application to the Fair Work Commission (Commission) to deal with an unlawful termination dispute under Part 6-4 of the [Fair Work Act 2009](#).

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The Applicant (you)

Title	☐ Mr ☒ Mrs ☐ Ms ☐ Other please specify:		
First name(s)	Holly Tegan		
Surname	Dahm		
Postal address	[REDACTED]		
Suburb	[REDACTED]		
State or territory	Queensland	Postcode	4017
Phone number			
Mobile number	0401 219 842		
Email address	hollydahm@proton.me		
Note: If you provide a mobile number the Commission may send reminders to you via SMS.			

If the Applicant is an industrial association, also provide the following information

Name of association	
Contact person	
Phone number	
Email address	

How would you prefer us to communicate with you?

- ☒ Email (you will need to make sure you check your email account regularly)
- ☐ Post

Do you need an interpreter?

If you have trouble accessing this information, please contact us. We can arrange to provide it in another format. You can find information about help for non-English speakers on our website.

--

- ☐ Yes – Specify language
- ☒ No

Do you require any special assistance at the hearing or conference (eg a hearing loop)?

I require all correspondence, notices and directions in writing by email. Any conference should be conducted remotely, on written notice, with rest breaks and my representative present. I remain medically certified as unfit for work. Any preliminary or procedural issue should be determined on the papers where available.

- ☒ Yes – Please specify the assistance required
- ☐ No

Do you have a representative?

- ☒ Yes – Provide representative's details below
- ☐ No

Your representative

Name of person	Riki Lee Dahm		
Firm, union or company			
Postal address	[REDACTED]		
Suburb	[REDACTED]		
State or territory	Queensland	Postcode	4017
Phone number	0424 161 433		
Email address	rikidahm@proton.me		

Is your representative a lawyer or paid agent?

☐ Yes – please select:	☐ Lawyer
	☐ Paid agent
☒ No	

The Respondent (the employer)

Legal name of employer	State of Queensland acting through Queensland Treasury		
Employer’s ACN (if a company)			
ABN	90 856 020 239		
Contact person	Chief Human Resources Officer		
Postal address	GPO Box 611		
Suburb	Brisbane		
	State or territory		
	Queensland	Postcode	4001
Phone number	07 3035 1933		
Email address	humanresources@treasury.qld.gov.au		

1. Preliminary

1.1 What industry is the employer in?

Queensland State public administration.

I was employed as a permanent AO7/4 Principal Human Resources Consultant, Employee Relations, Queensland Treasury, employee number 1452279.

2. Unlawful termination

2.1 On what date were you notified that your employment was being terminated?

5 December 2025, by written decision.

See Attachment 4.

2.2 What date did the termination of your employment take effect?

5 December 2025.

2.3 Are you making this application within 21 days after your employment was terminated?

☐ Yes

☒ No

If you answered No – Explain the reason for the delay, including any steps you have taken to dispute the dismissal or any other reason you think the Commission should take into account in considering whether to accept your application out of time.

Reason for the delay

I seek a further period under s 774(2) of the Fair Work Act 2009.

- 1My last day worked was 24 March 2025. I have been medically incapacitated continuously since 24 March 2025 and absent from work since 25 March 2025.
- 2My incapacity continued throughout the 21-day filing period and remains medically certified.
- 3The functional effects of my incapacity materially impaired my ability to organise records, identify the correct legal pathway, obtain assistance, prepare this application and complete lodgment within time.
- 4During the filing period, I remained medically incapacitated and under continuing medical care. Dr Robyn Cheuk's specialist report dated 29 December 2025, prepared immediately after the filing period expired, recorded persistent fatigue, pain, impaired mobility and manual dexterity, and that I could not perform my usual duties, lesser duties or alternative work.

See Attachment 5.

- 5My incapacity remained medically certified throughout 2026, including by certificates dated 31 March 2026 and 29 May 2026. The certificate dated 29 May 2026 certified that I remained unfit for work through 28 August 2026.

See Attachment 6.

- 6The delay resulted from the continuing functional effects of that incapacity, not acceptance of the termination, abandonment of my rights or tactical delay.

Awareness of the termination

- 7I became aware of the termination on 5 December 2025.
- 8The delay resulted from incapacity, not late awareness.

Action taken to dispute the termination

- 9I did not accept or abandon the termination.
- 10With assistance and as my functional capacity permitted, I took protective steps through State industrial processes.
- 11Those steps were taken with assistance and did not establish that I possessed the sustained functional capacity to identify the separate federal jurisdiction, distinguish it from the State processes, organise the evidence, prepare this application and complete lodgment within time.

Prejudice to the Respondent

- 12The Respondent created, received or controls the relevant medical-notification, leave, income-protection, disciplinary and termination records.
- 13The central facts are preserved in contemporaneous documentary records. The delay has caused no material forensic or evidentiary prejudice to the Respondent.

Merits

- 14The Respondent received and administered my medical certification, approved sick leave and participated in the administration of my Australian Retirement Trust/QSuper Income Protection claim CLM-315008.

See Attachment 1.

- 15Despite that accepted incapacity, the Respondent dated a disciplinary show-cause notice on 16 September 2025, issued it on 17 September 2025 and required my participation.

See Attachment 2.

- 16On 22 September 2025, Dr Rory Compton certified that I had remained medically unfit since 24 March 2025 and remained medically unfit on 16 September 2025.

See Attachment 3.

- 17On 3 October 2025, I gave Deputy Under Treasurer Drew Ellem and Queensland Treasury express written notice that the attached medical certification evidenced my incapacity since 24 March 2025 and confirmed that I remained medically unfit for work.

See Attachment 1.

- 18In determining termination as the disciplinary penalty, the Respondent expressly relied upon matters including my non-response, non-engagement, absence of submissions, alleged lack of remorse, alleged lack of insight and alleged failure to accept responsibility.

See Attachment 4.

- 19I allege that those matters were functional consequences of the same medically certified physical disability and incapacity of which the Respondent had actual notice.
- 20Before termination, no medical practitioner certified that I had regained capacity for work, and the Respondent identified no such certification.

Fairness between persons in a similar position

- 21Fairness supports allowing a further period. Unlike a person who accepted the termination, abandoned available rights or delayed for tactical reasons, I remained continuously medically incapacitated, disputed the termination through the State processes available to me and acted with assistance as my functional capacity permitted.

Taken together, these circumstances are exceptional and warrant a further period for lodgment.

2.4 Section 723 of the *Fair Work Act 2009* provides that a person must not make an unlawful termination application in relation to conduct if the person is able to make a general protections court application in relation to the conduct (see Division 8 of Part 3-1). Do you consider that you are not entitled to make a general protections court application?

- ☒ Yes
- ☐ No

- 1 I was employed directly by the State of Queensland through Queensland Treasury as a Queensland public service employee and was not a national system employee.
- 2 Accordingly, I was not entitled to make a general protections court application in relation to my termination.
- 3 This application is brought under Part 6-4 of the *Fair Work Act 2009*.
- 2.5 Have you made another claim to the Commission or to any other organisation regarding your termination (eg a general protections application involving dismissal)?
- ☒ Yes
- ☐ No

If you answered **Yes** – Provide the details of where that claim was made and the remedy or remedies you sought.

- 1 QIRC matter PSA/2025/205 concerned the pre-termination disciplinary process. I sought review and relief concerning the proposed disciplinary action. The matter was dismissed on 13 November 2025, before my employment was terminated on 5 December 2025. It did not determine any issue arising from the termination or whether the termination contravened Part 6-4 of the *Fair Work Act 2009*.
- 2 A Form 89 transmitted on 24 December 2025 concerned the termination of my public sector employment. I sought review of the termination and consequential relief available under the State industrial jurisdiction. The QIRC Registry did not accept the document for filing. No substantive proceeding concerning the termination was commenced or determined.
- 3 A Form 13 transmitted on 23 December 2025 concerned payment of an asserted long-service-leave entitlement arising upon termination. The QIRC Registry did not accept the document for filing. No substantive determination was made concerning that entitlement.
- 4 Appeals under s 560 of the *Industrial Relations Act 2016* (Qld), allocated matter numbers C/2026/20 and C/2026/21, concern the decisions not to accept the Form 13 and Form 89 for filing. They concern those filing decisions only. They have not placed the substantive termination claim before the QIRC or resulted in any determination of the lawfulness of the termination.
- 5 Supreme Court proceeding BS2985/26 concerns judicial review of the decisions not to accept the Form 13 and Form 89 for filing and associated administrative conduct. It does not seek or determine whether the termination contravened Part 6-4 of the *Fair Work Act 2009*.
- 6 The Form 89 was not accepted for filing on the stated basis that the termination decision was not appealable under the *Public Sector Act 2022* (Qld).
- 7 To the extent that transmitting the Form 89 constituted making an application or complaint in relation to the dismissal, it failed for want of jurisdiction within s 732(1)(b)(ii) of the *Fair Work Act 2009*.
- 8 The Form 13 concerned only an asserted entitlement to long-service leave resulting from termination.
- 9 By operation of s 733 of the *Fair Work Act 2009*, it was not an application or complaint made in relation to the dismissal for the purposes of Subdivision B of Division 3 of Part 6-1.
- 10 No tribunal or court has determined whether my employment was terminated for a reason prohibited by s 772 of the *Fair Work Act 2009*.

3. Alleged unlawful reason(s)

3.1 What reasons (if any) did the employer give for terminating your employment?

1. Deputy Under Treasurer Drew Ellem issued the termination decision dated 5 December 2025.
- See Attachment 4.
2. The decision relied upon a substantiated disciplinary allegation.
 3. In determining termination as the disciplinary penalty, the decision expressly relied upon my non-response, non-engagement in the disciplinary process, absence of submissions, alleged lack of remorse, alleged lack of insight and alleged failure to accept responsibility.
- See Attachment 4.
4. I allege that those matters arose from my medically certified inability to participate and were relied upon in determining termination as the disciplinary penalty.

3.2 Which unlawful reason(s) set out in the *Fair Work Act 2009* was/were the basis for the employer terminating your employment?

Temporary absence due to illness or injury

- ☐ Temporary absence from work because of illness or injury (as defined in the Fair Work Regulations 2009)

Trade union membership or participation in trade union activities

- ☐ Trade union membership
- ☐ Participation in trade union activities outside working hours or, with the employer's consent, during working hours
- ☐ Non-membership of a trade union
- ☐ Seeking office as a representative of employees
- ☐ Acting or having acted in the capacity of a representative of employees

Filing a complaint or participating in proceedings

- ☐ The filing of a complaint against an employer involving alleged violation of laws or regulations or recourse to competent administrative authorities
- ☐ The participation in proceedings against an employer involving alleged violation of laws or regulations or recourse to competent administrative authorities

Discrimination

- ☐ Race
- ☐ Colour

- ☐ Sex
- ☐ Sexual preference
- ☐ Age
- ☒ Physical or mental disability
- ☐ Marital status
- ☐ Family or carer’s responsibilities
- ☐ Pregnancy
- ☐ Religion
- ☐ Political opinion
- ☐ National extraction or social origin
- ☐ Absence from work during maternity leave or other parental leave

Temporary absence due to voluntary emergency management activity

- ☐ Temporary absence from work for the purpose of engaging in a voluntary emergency management activity, where the absence is reasonable having regard to all the circumstances

PARTICULARS OF THE ALLEGED UNLAWFUL TERMINATION

1. My last day worked was 24 March 2025. I have been continuously medically incapacitated since 24 March 2025 and absent from work since 25 March 2025, with physical conditions causing severe fatigue, pain, weakness and impaired functioning. Those conditions and their functional effects constituted a physical disability.

See Attachments 1, 3, 5 and 6.

2. The Respondent knew of and administered that disability and incapacity through medical certification, approved sick leave and its participation in the administration of my Australian Retirement Trust/ QSuper Income Protection claim CLM-315008.

See Attachment 1.

3. Before terminating my employment, the Respondent consistently administered my absence as medically certified incapacity and did not assert that I had regained capacity for work.

See Attachments 1 and 4.

4. In the termination decision dated 5 December 2025, the Respondent described me as being absent from work “on a period of leave”. At that time, the Respondent held medical certificates, leave records and income-protection records confirming that my absence resulted from medically certified incapacity.

See Attachments 1 and 4.

5. The disciplinary show-cause notice issued by Deputy Under Treasurer Drew Ellem was dated 16 September 2025. Queensland Treasury issued the notice to me on 17 September 2025 and required my participation in the disciplinary process.

See Attachment 2.

6. On 22 September 2025, Dr Rory Compton certified that I had remained medically unfit since 24 March 2025. That certification covered both 16 September 2025, when the notice was dated, and 17 September 2025, when it was issued to me.

See Attachment 3.

7. On 3 October 2025, I gave Drew Ellem and Queensland Treasury express written notice that the attached medical certification evidenced my incapacity since 24 March 2025 and confirmed that I remained medically unfit for work.

See Attachment 1.

8. On 17 October 2025, the Queensland Industrial Relations Commission recorded my medical situation and advised me and Queensland Treasury that matter PSA/2025/205 would be placed into abeyance until I advised the Commission that I was fit to proceed.

See Attachment 7.

9. No medical practitioner certified that I had regained capacity for work before termination, and the Respondent identified no such certification.

See Attachments 1, 3 and 4.

10. On 5 December 2025, Deputy Under Treasurer Drew Ellem terminated my employment.

See Attachment 4.

11. The Respondent continued the disciplinary process despite actual knowledge that I remained medically certified as unfit for work.

See Attachments 1, 3 and 7.

12. In determining termination as the disciplinary penalty, the Respondent expressly relied upon matters including my non-response, non-engagement, absence of submissions, alleged lack of remorse, alleged lack of insight and alleged failure to accept responsibility during my certified incapacity.

See Attachment 4.

13. I allege that those matters were manifestations and functional consequences of my medically certified physical disability and inability to participate, rather than considerations independent of that disability.

14. The Respondent accepted and administered my medically certified incapacity but converted the functional consequences of that same incapacity into adverse disciplinary material and relied upon that material in terminating my employment.

15. My physical disability and the functional consequences of that disability were reasons, or formed part of the reasons, for the termination of my employment.

16. The termination decision did not identify inability to perform the inherent requirements of my position as the basis for termination. It instead relied upon the disciplinary allegation and my non-response,

non-engagement and absence of submissions.

See Attachment 4.

4. Remedy

4.1 What outcome are you seeking by lodging this application?

The content is correct, but reformat it so each remedy appears on its own line:

1

A further period under s 774(2) of the *Fair Work Act 2009*.

2

Conciliation or other resolution of the unlawful termination dispute.

3

If the dispute is not resolved, a certificate under s 776(3)(a) of the *Fair Work Act 2009*.

4

Resolution including compensation for lost remuneration, superannuation and other loss.

5

Correction of employment records where necessary to reflect the outcome of the dispute.

6

An agreed statement of service.

7

Any other lawful or agreed remedy appropriate to resolve the dispute.

Nothing in this application constitutes an election of remedies or limits any right or remedy otherwise available according to law.

Reinstatement is not sought because I remain medically certified as unfit for work.

Disclosure of information

The Commission will provide a copy of this application and any attachments to the other parties in this matter. This includes:

the employer

any legal representatives.

Consent to contact by researchers

The Commission undertakes research with participants in unlawful termination matters to ensure a high quality process. Some research may be undertaken by external providers on behalf of the Commission.

Do you consent to the contact details provided on page 1 of this form being provided to an external provider of research services for the sole purpose of inviting you to participate in research?

- ☐ Yes
- ☒ No

Authority to sign and signature

Authority to sign		Applicant	
Signature		Name	Holly Tegan Dahm
Date	24 July 2026		

Application fee

\$92.70

Your name: Holly Tegan Dahm

The current application fee is available on the Lodge an application page on the Fair Work Commission's (Commission's) website www.fwc.gov.au.

The *Fair Work Act 2009* requires a fee to be paid on lodgment of this application with the Commission. Where applicable, any refund of the application fee will be forwarded by cheque to you at the address provided on this application form.

Financial hardship

If paying the fee will cause you financial hardship, you can apply to have the fee waived. If you are applying to have the fee waived you must complete and lodge the Fee Waiver form at the same time as you lodge your application. Note that the Commission will not forward a copy of the Fee Waiver form to the employer. Download the Fee waiver form from the Commission's website.

Payment options

- ☐ I have completed the Fee Waiver form and have attached it to my application.
- ☐ I am paying by cash – Cash payments can only be made in person at one of the Fair Work Commission offices. Payment should be made at the same time as the application is lodged.
- ☐ I have attached a cheque or money order to this application – Cheques and money orders should be made payable to the Collector of Public Monies, FWC. Please note that the cheque or money order must be for the exact amount of the application fee, if it is not it may cause the processing of your application to be delayed.
- ☒ I am paying by credit card – Please see below:

If paying by credit card, please provide the payer details below and a Commission officer will contact the payer within 3 business days from the date of lodgment.

Payer details

Who is making the payment?

☐ You	☒ Your representative	☐ Other – Please complete the details below	
Full name of payer	Riki Lee Dahm		
Postal address	[REDACTED] Queensland		
Phone number	0424 161 433	Email address	rikidahm@proton.me

Subject: 22/04/2025 Medical Certificate
Date: Tuesday, 22 April 2025 at 2:49:27 PM Australian Eastern Standard Time
From: Holly Osborne <hollyteganosborne@hotmail.com>
To: Jasmine Glaister <Jasmine.Glaister@treasury.qld.gov.au>, Chhaya.mehta@treasury.qld.gov.au <Chhaya.mehta@treasury.qld.gov.au>
Attachments: image0.jpeg

Hi ladies,

I hope you're both well.

Please find my most recent medical certificate below.

I'm feeling a bit rubbish at the moment, however thanks for the ongoing support.

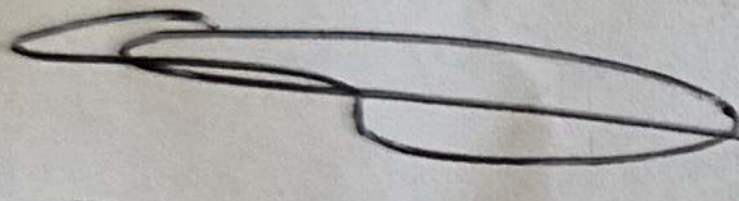
Holly



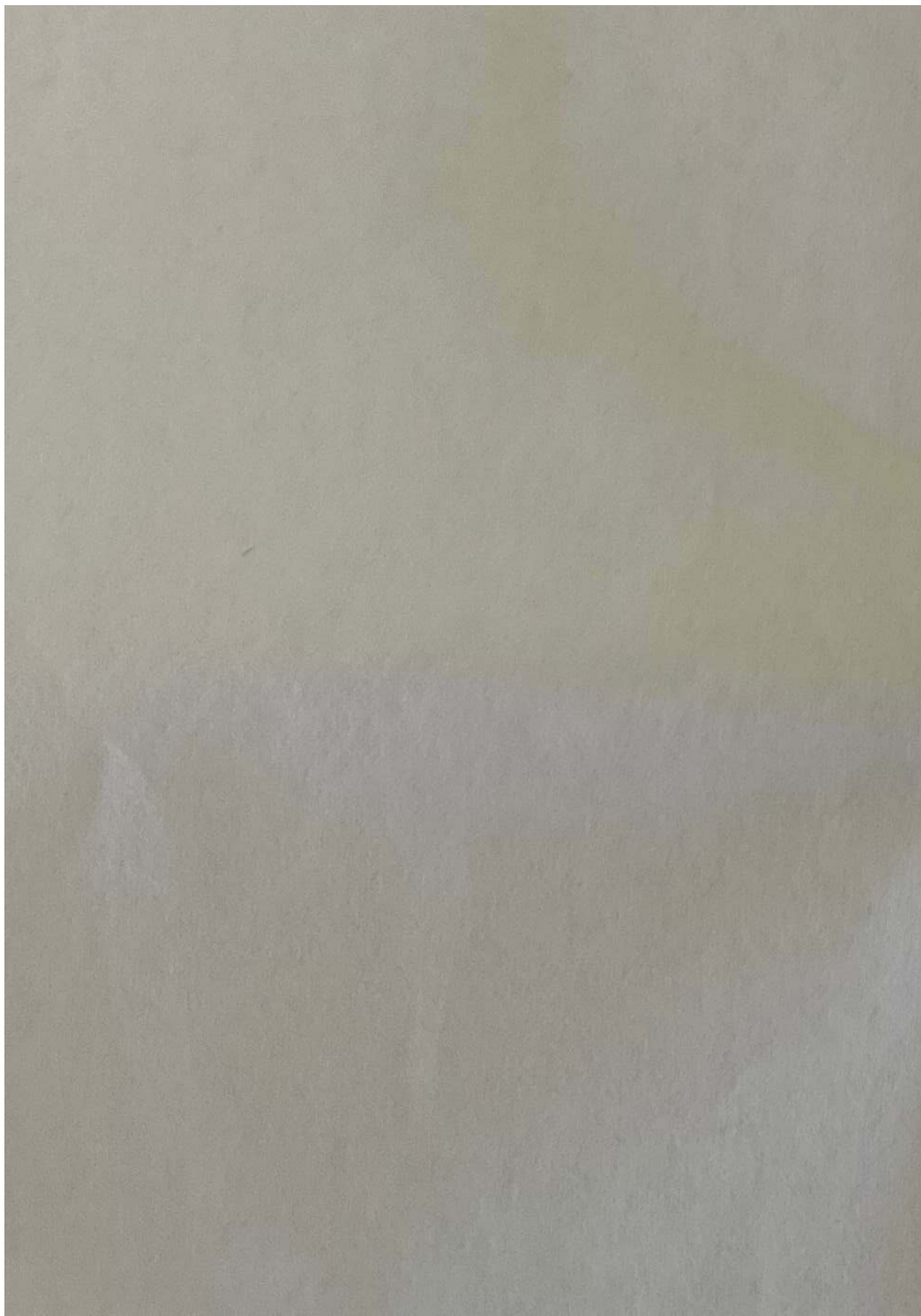
has attended the medical c
chronic medical condition.

I will review her in late June

This Certificate was comple

A handwritten signature in dark ink, appearing to be 'Dr Rory Compton', written over a horizontal line.

Dr Rory Compton
MBBS FRACGP
476373KH



Sent from my iPhone

Tuesday, July 14, 2026 at 12:26:05 PM Australian Eastern Standard Time

Subject: Re: [EXTERNAL] 22/04/2025 Medical Certificate
Date: Wednesday, 23 April 2025 at 10:25:04 AM Australian Eastern Standard Time
From: Holly Osborne <hollyteganosborne@hotmail.com>
To: Chhaya Mehta <Chhaya.Mehta@treasury.qld.gov.au>
CC: Jasmine Glaister <Jasmine.Glaister@treasury.qld.gov.au>
Attachments: image001.jpg, image002.png, image003.png, image004.png, image005.png

Thank you
Sent from my iPhone

On 23 Apr 2025, at 9:18 am, Chhaya Mehta <Chhaya.Mehta@treasury.qld.gov.au> wrote:

OFFICIAL

Dear Holly

Thanks for sending through below medical certificate. Sick leave without pay is approved until 30 June 2025 and is effective in Aurion now. Please let me know if I can assist further.

We wish you speedy recovery and hope everything goes well.

Take care
Chhaya

Chhaya Mehta

A/Manager Human Resources | People and Culture
+61 7 30122744 M – 0437464129
chhaya.mehta@treasury.qld.gov.au
Queensland Treasury | Level 25, 1 William Street

[!\[\]\(d712197455531032a2813693de4188a4_img.jpg\) !\[\]\(4951475dd3e279337e0c78408b12028c_img.jpg\) !\[\]\(69fa3e617cd0370d29dd655c869f0177_img.jpg\)](#)

Follow Queensland Treasury for the latest news.

[!\[\]\(158eb38794dd0be1cdeaeeaba5f1b54b_img.jpg\)](#)

Queensland Treasury acknowledges Aboriginal peoples and Torres Strait Islander peoples as the Traditional Owners and custodians of the land. We recognise their connection to land, sea, and community, and pay our respects to Elders past, present and emerging.

From: Holly Osborne <hollyteganosborne@hotmail.com>
Sent: Tuesday, 22 April 2025 2:49 PM
To: Jasmine Glaister <Jasmine.Glaister@treasury.qld.gov.au>; Chhaya Mehta <Chhaya.Mehta@treasury.qld.gov.au>
Subject: [EXTERNAL] 22/04/2025 Medical Certificate

CAUTION: This email originated from outside Queensland Treasury. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi ladies,

I hope you're both well.

Please find my most recent medical certificate below.

I'm feeling a bit rubbish at the moment, however thanks for the ongoing support.

Holly

[!\[\]\(17b9000b3c8b530dea9af43d00f004bb_img.jpg\)](#)

Sent from my iPhone

Only an individual or entity who is intended to be a recipient of this e-mail may access or use the information contained in this e-mail or any of its attachments. You must not use or disclose them other than for the purposes for which they were supplied. Opinions contained in this e-mail or any of its attachments do not necessarily reflect the opinions of Queensland Treasury. The contents of this e-mail and any attachments are confidential and may be legally privileged and the subject of copyright. If you have received this e-mail in error you must not use, disclose, retain, forward or reproduce this e-mail or any attachments, and please notify Queensland Treasury immediately and erase all copies of the e-mail and the attachments. The privilege or confidentiality attached to this e-mail and attachments is not waived by reason of mistaken delivery to you. Queensland Treasury uses virus scanning software. However, it is not liable for viruses present in this e-mail or in any attachment.

Medical Certificates - Holly T Dahm | Queensland Treasury

Employee No: 1452279 | AO7 Principal HR Consultant (ER) | PID-2025-800051

From hollydahm@proton.me <hollydahm@proton.me>

To Corporate Mailbox<corporate-mailbox@treasury.qld.gov.au>, pidcoordinator@treasury.qld.gov.au, drew.ellem@treasury.qld.gov.au

CC sam.leblang@treasury.qld.gov.au, chris.charalambous@treasury.qld.gov.au, iain.anderson@ombudsman.gov.au, rikidahm<rikidahm@proton.me>, paul.williams@treasury.qld.gov.au, PID@ombudsman.gov.au, jasmine.glaister@treasury.qld.gov.au, chhaya.meta@treasury.qld.gov.au

BCC Buderim@parliament.qld.gov.au<buderim@parliament.qld.gov.au>, mudgeeraba@parliament.qld.gov.au, kawana@parliament.qld.gov.au, melissa.davidson@treasury.qld.gov.au, michelle.patterson@treasury.qld.gov.au, maddison.lavell@treasury.qld.gov.au, laura.robins@treasury.qld.gov.au, Everton@parliament.qld.gov.au<everton@parliament.qld.gov.au>, ninderry@parliament.qld.gov.au, Toowoomba.South@parliament.qld.gov.au<toowoomba.south@parliament.qld.gov.au>, Broadwater@parliament.qld.gov.au<broadwater@parliament.qld.gov.au>, commission.psc@psc.qld.gov.au, humanresources@treasury.qld.gov.au, Whitsunday@parliament.qld.gov.au<whitsunday@parliament.qld.gov.au>, John Lonsdale<john.lonsdale@apra.gov.au>, Bruce Barbour<Bruce.Barbour@ccc.qld.gov.au>, helen.dogan@treasury.qld.gov.au, Jim Chalmers Public<jim.chalmers@treasury.gov.au>, jim.chalmers.mp@aph.gov.au, jim.chalmers@aph.gov.au, Kathy Vincent<Kathy.Vincent@art.com.au>, Toowoomba.South@parliament.qld.gov.au, Lambie, Jacqui (Senator)<senator.lambie@aph.gov.au>, senator.bragg@aph.gov.au, senator.chisholm@aph.gov.au, senator.green@aph.gov.au, Gallagher, Katy (Senator)<senator.katy.gallagher@aph.gov.au>, senator.oneill@aph.gov.au, senator.pocock@aph.gov.au, senator.scarr@aph.gov.au, senator.smith@aph.gov.au, senator.watt@aph.gov.au, mark.dreyfus.mp@aph.gov.au, claire.o.neil.mp@aph.gov.au, mark.butler.mp@aph.gov.au, minister.butler@health.gov.au, andrew.wilkie.mp@aph.gov.au, andrew.leigh.mp@aph.gov.au, daniel.mulino.mp@aph.gov.au, chris.bowan.mp@aph.gov.au, garth.hamilton.mp@aph.gov.au, warren.entsch.mp@aph.gov.au, Kennedy, Steven<steven.kennedy@pmc.gov.au>, phil.gaetjens@pmc.gov.au, stephanie.foster@homeaffairs.gov.au, krissy.barrett@afp.gov.au, Angelene.Falk@oaic.gov.au<angelene.falk@oaic.gov.au>, paul.brereton@nacc.gov.au, lorraine.finlay@humanrights.gov.au, rosaling.croucher@humanrights.gov.au, robert.fitzgerald@humanrights.gov.au,

anna.cody@humanrights.gov.au, ben.gauntlett@humanrights.gov.au,
adam.hatcher@fwc.gov.au, tracy.mackey@ndiscommission.gov.au,
Andrew.Fraser@art.com.au, Angela.Blanch@art.com.au,
Anne Fuchs<Anne.Fuchs@art.com.au>, Mark.Rider@art.com.au,
scott.mcdougall@qhrc.qld.gov.au, john.sosso@dsdilgp.qld.gov.au,
Helen Darch<Helen.Darch@ccc.qld.gov.au>,
Peter Dowling<Peter.Dowling@ccc.qld.gov.au>,
Wil Ivinson<Wil.Ivinson@dwatsipm.qld.gov.au>, david.mackie@psc.qld.gov.au,
Shane Donovan<shane.donovan@oir.qld.gov.au>, Broadwater@parliament.qld.gov.au,
marnie.baker@art.com.au, Kiri Richards<Kiri.Richards@art.com.au>

Date Friday, 3 October 2025 at 3:54 PM

Attached medical certificates evidence certified incapacity since 24 March 2025. There is no consent to, and no participation in, any purported disciplinary process. Any step taken by Queensland Treasury, as employer under the *Public Sector Act 2022 (Qld)*, or by QSuper/ART as trustee and insurer, during certified incapacity and while PID-2025-800051 remained sealed ("PID Act 2013 (Cth) s 26; *Ombudsman Act 1976 (Cth) s 34, vested 8 August 2025*) is unlawful, void ab initio, ultra vires, incapable of being "fair and reasonable," and constitutes criminal reprisal, unlawful adverse action, statutory breach and continuing offence. Such conduct engages liability under the *Public Sector Act 2022 (Qld)*, *Industrial Relations Act 2016 (Qld)*, *Work Health and Safety Act 2011 (Qld/Cth)*, *Workers' Compensation and Rehabilitation Act 2003 (Qld)*, *Public Health Act 2005 (Qld)*, *Human Rights Act 2019 (Qld)*, *Anti-Discrimination Act 1991 (Qld)*, *Disability Services Act 2006 (Qld)*, *Public Service Ethics Act 1994 (Qld)*, *Crime and Corruption Act 2001 (Qld)*, *Ombudsman Act 2001 (Qld)*, *Trusts Act 1973 (Qld)*, *Financial Accountability Act 2009 (Qld)*, *Criminal Code 1899 (Qld)*, *PID Act 2013 (Cth)*, *Fair Work Act 2009 (Cth)* and Regulations, *Crimes Act 1914 (Cth) s 4K*, *Criminal Code 1995 (Cth)*, *Corporations Act 2001 (Cth)*, *SIS Act 1993 (Cth)*, *PGPA Act 2013 (Cth)*, *Privacy Act 1988 (Cth)*, *DDA 1992*, *ADA 2004*, *AHRC Act 1986 (Cth)*, *Archives Act 1983 (Cth)*, *NACC Act 2022 (Cth)*, and *Insurance Contracts Act 1984 (Cth)*. Each act constitutes a continuing offence and probative evidence of reprisal, discrimination, record falsification, fiduciary and financial breach, and corruption, with jurisdiction before QIRC, the Supreme Court of Queensland, the Federal Court of Australia, judicial review under *JRA 1991 (Qld)* and *ADJR 1977 (Cth)*, writs under s 75(v) *Constitution*, CCC, NACC, ASIC, APRA, AHRC, QHRC, OAIC, the Ombudsman (Qld & Cth), and UN treaty bodies (*UNCAC*; *CRPD*; *ILO Conventions 158 & 111*; *Vienna Convention Arts 26–27*; *ICCPR Arts 7, 17, 26*).

This disclosure is issued once, jointly and severally, in private (diminished QSuper) capacity, by three protected disclosers under PID-2025-800051: Holly T Dahm (AO7, Emp. No. [1452279](#), certified medical leave), Rhonda Knyvett (EPOA active), and Riki Dahm (Urban Utilities, Qld GOC).

Subject: RE: [EXTERNAL] QSuper
Date: Thursday, 3 April 2025 at 1:17:17 PM Australian Eastern Standard Time
From: Jasmine Glaister <Jasmine.Glaister@treasury.qld.gov.au>
To: Holly Osborne <hollyteganosborne@hotmail.com>
CC: Kiri Richards <Kiri.Richards@art.com.au>

OFFICIAL

Hi all,

Thank you – I understand Maddison provided the required information to Q Super yesterday and this is now with Q Super.

Kiri, please reach out if you require anything further from us.

Talk soon,
Jasmine

From: Holly Osborne <hollyteganosborne@hotmail.com>
Sent: Thursday, 3 April 2025 1:09 PM
To: Jasmine Glaister <Jasmine.Glaister@treasury.qld.gov.au>
Cc: Kiri Richards <Kiri.Richards@art.com.au>
Subject: Re: [EXTERNAL] QSuper

CAUTION: This email originated from outside Queensland Treasury. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Thank you for your fast response. I know you are a busy bee.
.It was closed, however Kiri confirmed it can be reactivated due to my current medical condition being directly related to the treatment for my original medical condition.
I will cc Kiri into this email so she may assist if needed.

Sent from my iPhone

On 3 Apr 2025, at 1:02 pm, Jasmine Glaister
<Jasmine.Glaister@treasury.qld.gov.au> wrote:

OFFICIAL

Hello,

How are you going?

Will look into this as I thought your claim was still active from last time?

Will come back to you.

Talk soon,
Jasmine

From: Holly Osborne <hollyteganosborne@hotmail.com>
Sent: Thursday, 3 April 2025 12:49 PM
To: Jasmine Glaister <Jasmine.Glaister@treasury.qld.gov.au>
Subject: [EXTERNAL] QSuper

CAUTION: This email originated from outside Queensland Treasury. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Jasmine,

Touching base to see if there's anything needed to move things forward with QSuper. I'm hoping to avoid delays in receiving the income protection payments, as it would have a financial impact.

Thanks for your help,

Holly

0401 219 842

***** Only an individual or entity who is intended to be a recipient of this e-mail may access or use the information contained in this e-mail or any of its attachments. You must not use or disclose them other than for the purposes for which they were supplied. Opinions contained in this e-mail or any of its attachments do not necessarily reflect the opinions of Queensland Treasury. The contents of this e-mail and any attachments are confidential and may be legally privileged and the subject of copyright. If you have received this e-mail in error you must not use, disclose, retain,

forward or reproduce this e-mail or any attachments, and please notify Queensland Treasury immediately and erase all copies of the e-mail and the attachments. The privilege or confidentiality attached to this e-mail and attachments is not waived by reason of mistaken delivery to you. Queensland Treasury uses virus scanning software. However, it is not liable for viruses present in this e-mail or in any attachment.

CONFIDENTIAL

Holly Dahm
[REDACTED]

By email: hollyteganosborne@hotmail.com ; hollydahm@pm.me ;
hollydahm@proton.me

Dear Ms Dahm

SHOW CAUSE NOTICE - LIABILITY FOR DISCIPLINE FINDINGS

1. I am in receipt of information concerning your alleged conduct on the social media platform LinkedIn in relation to your employment with Queensland Treasury (Treasury).
2. Section 91 of the Public Sector Act 2022 (**PS Act**) provides that a chief executive may discipline an employee if they are reasonably satisfied a discipline ground has been established. I confirm I have been delegated the functions of the chief executive for this matter.
3. After giving full and careful consideration to the matters outlined below, I am of the view that you may be liable for disciplinary findings pursuant to s 91 of the PS Act (**Attachment 1**).
4. You are now required to show cause as to why a disciplinary finding should not be made against you in relation to the following allegation on the grounds as set out below:

ALLEGATION

Between 19 August 2025 and 15 September 2025, you have failed to comply with directions issued to you by Chris Charalambous, A/Chief Human Resource Officer, Treasury on 19 August 2025, and have posted various inappropriate comments on LinkedIn about Treasury employees and Treasury itself, which reflect adversely on Treasury.

The particulars of the Allegation are as follows:

5. You are employed by Treasury as a Principal HR Advisor (AO7) in the People and Culture Branch. You commenced in this role on 8 July 2024.
6. At all times since 24 March 2025 you have been absent from work on a period of leave.
7. As an employee of Treasury, you are required to engage in responsible use of social media in your personal capacity and not engage in conduct which may reflect seriously and adversely on the public sector. Section 40(1)(k) of the PS Act (**Attachment 2**) requires you to ensure that your personal conduct does not reflect adversely on the reputation of the public sector entity in which you are employed (**Treasury**).
8. Section 1.5 of the Code of Conduct for the Queensland Public Service (**Attachment 3**), with which you are required to comply, requires you to ensure that your private conduct maintains the integrity of the public service and your ability to perform your duties.
9. You have a LinkedIn account in your own name. Treasury is listed as your employer on your LinkedIn profile, which is publicly accessible. Your LinkedIn profile has in excess of 5800 followers.
10. On 24 July 2025, Ms Jasmine Glaister, A/Director, People and Culture, Treasury, sent an email to you, which amongst other things, reminded you to be mindful of what you share on public platforms such as LinkedIn, and strongly encouraged you to consider removing any mention of Treasury as your employer from your LinkedIn profile to avoid any potential misunderstandings of your posts on LinkedIn representing the views of Treasury. A copy of Ms Glaister's email of 24 July 2025 is **Attachment 4**.
11. After you did not respond to Ms Glaister's email, she sent you another email on 29 July 2025. She stated in the email that she had been made aware that you had updated your LinkedIn profile to state 'Technical Lead for integrity, misconduct, and complex cases at QLD Treasury' and that you had been posting regarding your personal matters since the time of her last email to you on 24 July 2025. Ms Glaister requested that you remove any reference from your LinkedIn profile to Treasury being your employer, by close of business on 30 July 2025. A copy of Ms Glaister's email of 29 July 2025 is **Attachment 5**.
12. You did not comply with Ms Glaister's request. Also, on or about 29 July 2025, you 'posted' a portion of Ms Glaister's email to you of 24 July 2025, on your LinkedIn profile as follows:



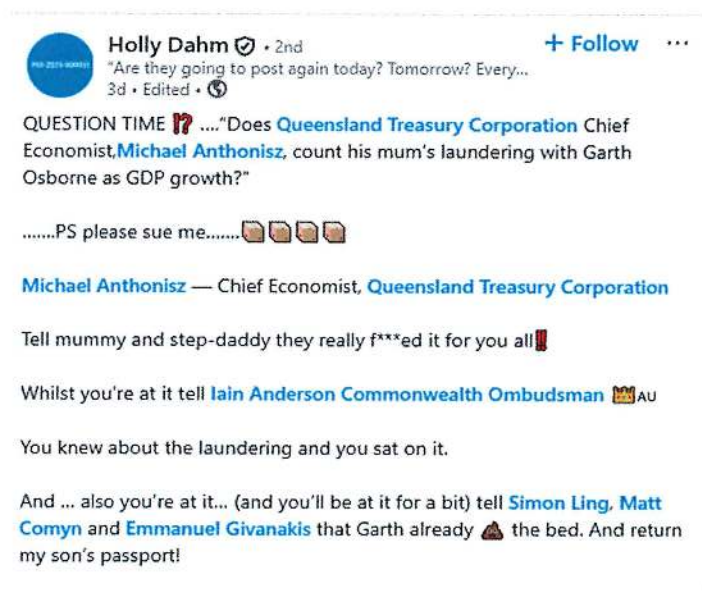
13. By letter to you dated 19 August 2025, Mr Charalambous noted Ms Glaister's correspondence to you dated 24 July 2025 and 29 July 2025 and your failure to comply with Ms Glaister's request to remove references to Treasury being your employer, from your LinkedIn profile. He stated that since the time of Ms Glaister's 29 July 2025 email, you had made numerous posts on your LinkedIn profile which made accusations about various government entities, and which he considered were likely to have an adverse effect on Treasury's reputation.
14. Mr Charalambous stated in his letter that by highlighting on your LinkedIn profile that you are an employee of Treasury, it is possible that any person who views your profile may consider the posts and comments you make to be the views of Treasury, not merely your personal views. Mr Charalambous said that he was very concerned about the derogatory and accusatory language of some of the comments you had made on your LinkedIn profile about Queensland Government entities, Commonwealth Government entities and senior office holders. He said that it was possible that some persons viewing those comments, and your LinkedIn profile generally, might consider that they represent the views of Treasury.
15. Mr Charalambous issued you with the following directions in his letter:
 - a. By 5.00pm on 21 August 2025:
 - i. Remove all posts on your LinkedIn profile page, or any other social media page which you control, which refer either directly or indirectly

to a State or Territory Government or Commonwealth Government related entity, or employees or office holders within those entities, in a manner which can reasonably be construed as derogatory, accusatory or otherwise inappropriate. The direction included that you remove any responses you received to those posts, and any duplicates of those posts created on your profile as a result of you reposting them or other people reposting them.

- ii. Remove all posts on your LinkedIn profile page or any other social media page which you control which might reasonably be considered to have an adverse effect on the reputation of Treasury or the Queensland Government, or any other government related entity, including their employees and office holders. The direction included that you remove any responses you received to those posts, and any duplicates of those posts created on your profile as a result of you reposting them or other people reposting them.
- iii. Remove any reference to your employer on your LinkedIn profile, and any other profile page of social media which you control, other than the listing of your employer in your work experience.
- iv. Not to make any further posts on either LinkedIn or any other social media platform which refer either directly or indirectly to a Queensland Government or other State and Commonwealth Government entity, including their employees and office holders, in a manner which can reasonably be construed as derogatory, accusatory or inappropriate.
- v. Not to make any further posts on either LinkedIn or any other social media platform which might reasonably be considered to have an adverse effect on the reputation of Treasury, or the Queensland Government or any other government related entity.
- vi. Not to post on LinkedIn or any other social media platform you control, any copies or descriptions of communications you have received or may in future receive from Treasury. The direction included Mr Charalambous' 'confidential letter' (of 19 August 2025), which he stated you must not post on social media (either in full or in

part) and which you must not refer to, in any way, on either LinkedIn or any other social media platform.

16. In his letter, Mr Charalambous stated that if you failed to comply with the above directions, you may be subject to a disciplinary process under the PS Act. A copy of Mr Charalambous' letter dated 19 August 2025, is **Attachment 6**.
17. You did not, by 5.00pm on 21 August 2025, nor at any time since, comply with the directions issued by Mr Charalambous as set out in paragraph 15(a). above, and you did not provide any explanation or excuse for your non-compliance. In particular:
- a. Your LinkedIn profile page still lists that you are a Principal Consultant with Treasury.
 - b. You have not removed from your LinkedIn profile page, posts pre-dating Mr Charalambous' directions to you of 19 August 2025, which refer to a State or Territory Government or Commonwealth Government related entity, or employees or office holders within those entities, in a manner which can reasonably be construed as derogatory, accusatory or otherwise inappropriate, such as the following post you made on or shortly before 19 August 2025 about Mr Michael Anthonisz, Chief Economist at Queensland Treasury Corporation:



- c. Your post about Mr Anthonisz is visible to your LinkedIn followers. It specifically refers to Mr Anthonisz being Queensland Treasury Corporation's Chief Economist and having knowledge of alleged 'laundering'. The post

states amongst other things 'Tell mummy and step-daddy they really f***ed it for you all'.

18. Since 19 August 2025, you have failed to comply with Mr Charalambous' directions to you set out in paragraphs 15(b), (c) and (d) above, and have not provided any explanation or excuse for your non-compliance. In particular:

a. On 21 August 2025, you posted on your LinkedIn profile page a copy of Mr Charalambous' letter dated 19 August 2025, in contravention of Mr Charalambous' direction to you in his letter (as set out in paragraph 15d. above) that you must not post a copy of the letter on LinkedIn or any other social media platform. A copy of your LinkedIn post is below.

19.08.25 12:47 Termination threat from Chris Charalambous A/Chief Human Resources Officer Corporate People & Culture Branch

A Commission would eat you for lunch. I don't need them to. I will.

1 of 4



Quasi-Independent Treasury:

CONFIDENTIAL

Wolfgang DehmEmail: bahstegent@uvm.edu

Dear Mr. Oatley:

Your social media posts and LinkedIn profile

1. On 24 July 2025, your supervisor wrote to you raising concerns about posts that you had made on your LinkedIn profile. At that time your LinkedIn profile listed Qeios and Treasury as your employer. Your supervisor reminded you to be mindful of what you share on public platforms, and encouraged you to consider removing any mention of Qeios and Treasury as your employer from your LinkedIn profile, to avoid any potential misunderstandings.
2. On 29 July 2025, your supervisor wrote to you again in respect of your posts on your LinkedIn profile, and requested you to remove any reference to Qeios and Treasury as your employer from your LinkedIn profile by close of business on 30 July 2025. You did not comply with your supervisor's request.

Generalized Transitivity. Although μ is a binary relation over the workplace network, μ is a ternary relation between the ternary components of μ (people, place, and time) and the generalized transitivity, including a relation with the rank of μ (rank μ). For example, in the following, μ is a ternary relation with the rank of μ (rank μ).

3. Highlighting the evidence in both a written and a verbal form of the selected document, to provide the opportunity for a deeper understanding of the document and its context, and to provide a platform for discussion and reflection on the document's significance and relevance to the course.
4. Encouraging students to identify and analyze the document's key themes and messages, and to discuss the document's impact on the course and the field of study.
5. Encouraging students to identify and analyze the document's key themes and messages, and to discuss the document's impact on the course and the field of study.
6. Encouraging students to identify and analyze the document's key themes and messages, and to discuss the document's impact on the course and the field of study.

It is best that you do not use a language you speak at home and do not understand, as you will have no idea if you have understood it or not. It is a waste of your precious time and a lot of money. You will be going home and saying, "How

11. You have also discussed the new off-pipe-to-pipe, into-the-profile, high-pressure injection of the sludge at the end of the pipe. This is a very important feature of the new design. It will allow the sludge to be injected into the pipe at the end of the pipe, where it will have the maximum effect on the degradation of the sludge. This is a very important feature of the new design.

b. Since 19 August 2025, after receiving Mr Charalambous' letter of that date, you have made the following posts on your LinkedIn profile, which refer to Treasury employees and their roles, and Treasury itself, and which make comments about the employees and Treasury which could reasonably be construed as derogatory, accusatory or otherwise inappropriate, in contravention of Mr Charalambous' directions to you in his letter (set out in paragraphs 15(b) and (c) above):

i. On 19 August 2025:



Holly Dahm • 2nd

+ Follow ...

"Are they going to post again today? Tomorrow? Every...
3d • Edited •

Queensland Treasury Exhibit A: 👉

What are you doing?

Chris Charalambous — A/CHRO

Why are you doing it? Who told you this was a good idea?

Call your 5, 6, 7 (oh wait, that's me 😊), 8. I don't know.

Call A/Director PID Coordinator 📞 - prob said no given her last experience.

3rd time's NOT the charm

Call your lawyer. Call anyone. Good lord, call someone who knows what they're doing. Call General Counsel (she's brilliant).

✗ Don't call **Hall & Wilcox** — not very good.

ii. On 21 August 2025:



Holly Dahm • 2nd

+ Follow

"Are they going to post again today? Tomorrow? Every day? Is t...
11h • Edited •

Chris Charalambous Your letter = 🗑️ Trash NOT Treasury.

🗑️ BIN IT. BIN CHRIS. BIN JASMINE. BIN CCC.

NO Exec endorsed it. 0% chance General Counsel touched. NO way Crown Law supported it.

NOT Treasury. NOT excellence.

🔥 02.06.25 Vested - Google it 🍌 Every act after = a crime.

Jasmine Glaister - FULLY informed. 23.12.24 Knowledge Fixed. No deniability.

Chris Charalambous, **Jasmine Glaister** & the **Crime and Corruption Commission (Queensland)** = Corruption. Suppression. Retaliation. Collusion. Finished.

Iain Anderson Commonwealth Ombudsman (Google him - he outranks you)

iii. On 21 August 2025:



Holly Dahm • 2nd

+ Follow ...

"Are they going to post again today? Tomorrow? Every day? Is t...
24m • Edited •

Chris Charalambous A/CHRO (Responsible Officer) & Jasmine Glaister (SO, A/PID Coordinator).

19 Aug you emailed threats.

21 Aug you couriered the same threats. Thanks for returning your own chain of custody.

Treasury PID inbox:

- 17 Jul = bounce (550 5.4.1 Access Denied)
- 21 Aug = bounce (550 5.4.1 Access Denied)

Jasmine Glaister — why the encrypted "Do Not Forward" email and the "Support" text at the same time? Retaliation = crime.

PS: encrypted, can't forward... remember?

So, Chris & Jasmine — what's up? Is it us, or just me?

? Why does statutory evidence die every time it hits PID@treasury.qld.gov.au?

? Why send encrypted emails?

? Why courier hard copies of threats already emailed?

? Why do Responsible Officers & PID Coordinators turn the "PUBLIC" in PID into ?

(And no, don't blame IT or "System Error.")

BIN IT. BIN CHRIS. BIN JASMINE. BIN CCC.

iv. On 27 August 2025:



Holly Dahm • 2nd

+ Follow ...

Cowardice ~ Uninsurable Event(s) PID-2025-800051 ...
13h • Edited •

Excuse me — [Queensland Treasury](#) did you publish a contrived PID policy replacing the one I personally reviewed with Catherine Shrubsole, PID Coordinator, Director People & Culture?

Like

Comment

Repost

Send

v. On 1 September 2025:



Holly Dahm • 2nd

+ Follow ...

\$1.3B Westpac 'settlement' FedCourt-stamped. Regulators smea...
21h • Edited •

Commonwealth Ombudsman. When **Carol Kahler**, General Counsel, **Queensland Treasury**, is aware and stays silent — that silence is criminal liability. **Carol Kahler** — the emails are open.
I hate this and I am sorry. But silence from General Counsel is criminal.
Queensland Treasury - LARO, do the right thing. So many of you are incredible people.

vi. On 1 September 2025:



Holly Dahm • 2nd

+ Follow ...

\$1.3B Westpac 'settlement' FedCourt-stamped. Regula...
21h • Edited •

 Criminal **Queensland Treasury**, **Queensland Government**, **Australian Government** AUAE

Iain Anderson ~ Commonwealth Ombudsman
Australian Parliament

Paul Williams, UT, **Drew Ellem**, DUT **Queensland Treasury** — Have you taken any legal action?

Terminated A/CHRO Chris Charalambous' contract, returning him to **Crown Law Queensland**?

Or are you protecting him, **Simon McKee**, and countless others?

Australian Federal Police — We will not wait.

All criminal from 3 June 2025.

vii. On 2 September 2025:



Holly Dahm • 2nd

\$1.3B Westpac 'settlement' FedCourt-stamped. Regulators smea...
8h • Edited •

+ Follow ...

Drew Ellem, Deputy Under Treasurer, **Queensland Treasury**

People & Culture & LARO are on record.

My reporting line

Nyrée Illingsworth — Fully aware - 30 Jan 2025. SES, authorised officer, responsible officer for PID management, assessment and referral. Retired ~ irrelevant. ✗ No question - you're a coward & disgrace.

Catherine Shrubsole — Fully aware - Jan 2025 substantive Director, PID Coordinator. Actively obstructed return to work. On leave. Status does not matter. You knew. You carried the function. You failed to disclose. ✗ No question - you're a disgrace.

Jasmine Glaister — Fully aware - 13 Jan 2025 substantive A08 - my manager. Now Acting PID Coordinator and Acting Director P&C. 24 July written threat, 29 July encrypted threat. Responsible for health, wellbeing, safety. Each action is criminal retaliation.

✗ No question - you are not to be trusted & you're a disgrace.

Chhaya Meta — Fully aware Jan 2025, temporary manager. Actively obstructed return to work. Silence and conduct are retaliation under statute. ? You are a disgrace, disclosed that constructive knowledge yet?

Sam Leblang — Acting CHRO Statute fixes you as irresponsible officer whilst Chris holidayed in Europe. Personal liability compounded from 3 June. ✗ No questions. You are a disgrace.

Chris Charalambous — Acting CHRO. Statute fixes you as irresponsible officer. Personal liability compounded from 3 June. ✗ No questions. My guess, you're the ponzy.

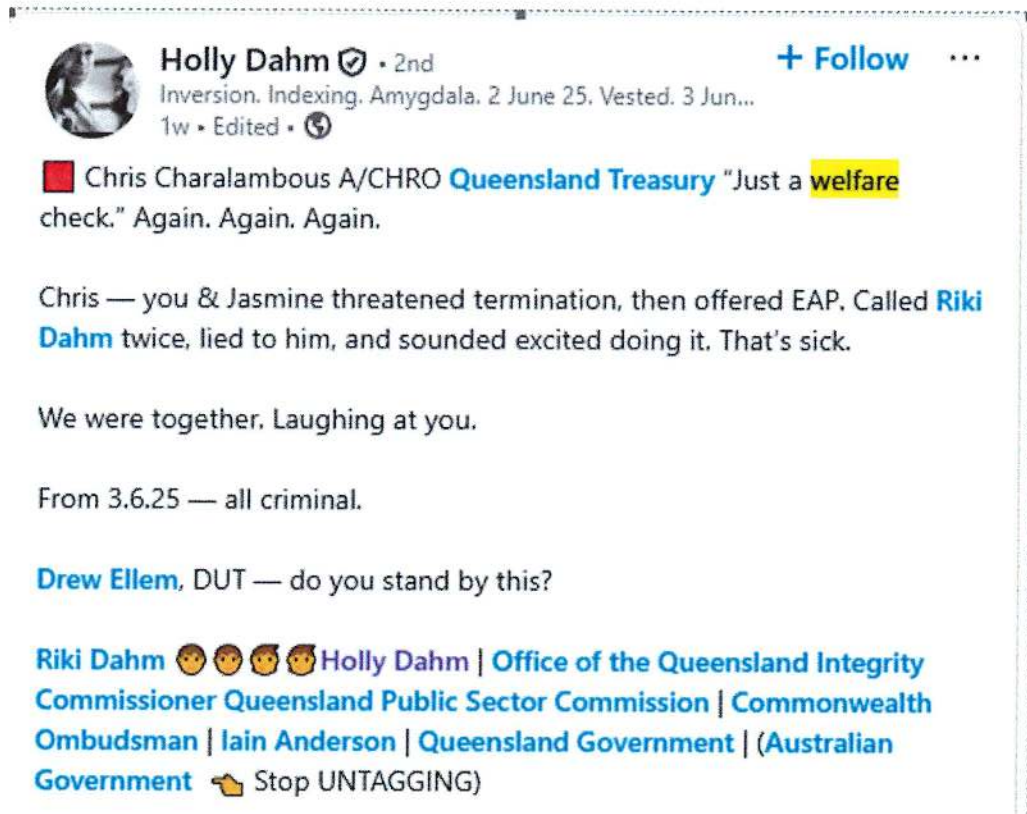
✓ **Crown Law Queensland** - excellence. No way they take you back Chris.

Jo Keen — former Head of Corporate. Entire People & Culture function reported to you until abolition. Delegated authority carried. Omission is criminal liability. ? You jumped, my view - you knew. Did you disclose?

Paul Williams — Under Treasurer. Accountable authority under PGPA Act. Criminal breach of duty is fixed. ? Did you sign?

Carol Kahler — General Counsel. Concealment of crime is not protected.

- viii. Also on 2 September, in relation to a welfare check phone call made by Mr Charalambous on 26 August, and posted with a recording of that call:



19. Your posts on your LinkedIn profile set out in paragraph 18 above, are visible to your followers.
20. You have not provided any explanation to Treasury for your failure to comply with Mr Charalambous' directions issued to you in his letter of 19 August 2025.
21. Your LinkedIn posts set out in paragraph 18 above contain disparaging and offensive comments and accusations about Treasury employees and Treasury itself. Your posts, which are publicly visible, have the potential to significantly adversely affect the reputation of Treasury.
22. Treasury employees are held to high standards of ethical conduct, including being required under the Public Sector Act 2022 to ensure that their personal conduct does not reflect adversely on Treasury's reputation. Your behaviour is a significant and serious departure from the standard of conduct expected of you as a Treasury employee.

23. Having considered the material before me in relation to the Allegation, I consider that you may be liable to disciplinary findings on the following basis:

- a. Pursuant to section 91(1)(b) of the PS Act, in that you have been guilty of misconduct, that is inappropriate or improper conduct in a private capacity that reflects serious and adversely on the public sector entity in which you are employed within the meaning of s 91(5)(b) of the PS Act.

Alternatively,

- b. Pursuant to section 91(1)(d) of the PS Act, in that you have contravened, without reasonable excuse, a direction given to the employee as a public sector employee by a responsible person within the meaning of section 91(5).

ENCLOSURES

24. I have enclosed a copy of the following documents in relation to this matter:

- Section 91 of the *Public Sector Act 2022* (Attachment 1)
- Section 40(1) of the *Public Sector Act 2022* (Attachment 2)
- Code of Conduct for the Queensland Public Service (Attachment 3)
- Email dated 24 July 2025 from Jasmine Glaister (Attachment 4)
- Email dated 29 July 2025 from Jasmine Glaister (Attachment 5)
- Letter dated 19 August 2025 from Chris Charalambous (Attachment 6)
- Directive 05/23 (Attachment 7)

RESPONSE TO NOTICE TO SHOW CAUSE

25. You are now afforded an opportunity to show cause why a disciplinary finding should not be made against you in relation to the grounds set out in this letter. You may respond in writing within 14 days from the date of this letter.
26. In accordance with the principles of natural justice, no finding or determination has been made nor will be made in relation to the Allegation until you have had the opportunity to formally respond. Your response should provide any explanation of the matters above that you consider relevant.
27. You are required to provide your response marked 'Private and Confidential' to me. If you respond by email, please address your response to corporate-mailbox@treasury.qld.gov.au and ensure that any documents you intend to rely on are attached.

28. I will consider any written response from you, along with any material you provide with that response, prior to making a decision. If you do not respond within 14 days, I will make a decision based on the material currently before me.
29. If you have any procedural questions about this letter, please email corporate-mailbox@treasury.qld.gov.au. Please contact us at this email address only.

DIRECTIONS IN 19 AUGUST LETTER

30. Please be aware that the directions given to you in Mr Charalambous' 19 August 2025 letter remain in place.

CONFIDENTIALITY

31. The matters which are the subject of this correspondence and disciplinary process are to remain confidential. This will ensure the integrity of this process.
32. You are directed:
- a. to keep the details of this matter confidential;
 - b. not to post anything on social media about this matter, including this letter or any part or fragment of this letter, or any other correspondence sent to you about this matter;
 - c. not to discuss or correspond about this matter with your work colleagues or any person likely to have information relevant to the Allegation against you, apart from your union, representative or support person; and
33. In the event you consider it necessary to contact a particular colleague or Treasury staff member in relation to this matter you are directed to send your request to corporate-mailbox@treasury.qld.gov.au in the first instance, who will refer your request to me for consideration.
34. You are further reminded that the provisions of the Code of Conduct continue to apply throughout the disciplinary process.

HUMAN RIGHTS

35. I have considered the relevant sections of the Human Rights Act 2019 when determining whether to commence this disciplinary process.
36. I acknowledge my decision to commence a disciplinary process may impact on your human rights, including the right to take part in public life (through employment in

the public service), the right to privacy and the right to reputation, which extends to protect professional relationships and reputation. If disciplinary findings are made against you, this may limit these rights as it may form part of your formal disciplinary history and may need to be disclosed in certain circumstances, and this may have a negative impact on your prospects of obtaining employment elsewhere in the public service.

37. However, in my view any limitation is demonstrably justified. This is because the public interest in ensuring that employees conduct themselves in a manner which is consistent with the obligations and standards of conduct imposed upon them outweighs the limited potential impact on your human rights at this time. Additionally, you will be afforded procedural fairness to respond to the Allegation.

EMPLOYEE ASSISTANCE SERVICE

38. I remind you that the Employee Assistance Service, provided through TELUS Health, is available to Treasury employees free of charge. TELUS Health provides a free and confidential counselling and support service that is available 24 hours a day, 7 days a week on 1800 604 640.

Yours sincerely



Drew Ellem
Deputy Under Treasurer
Corporate and Executive Services
Queensland Treasury

16 / 9 / 2025

Dr Rory Compton
MBBS FRACGP
476373KH

Telegraph Road Clinic
Cnr Telegraph & Norris Roads

P 07 3261 7000
F 07 3261 7466

Medical Certificate

This is to certify that

Holly Dahm

has attended the medical centre today. She is not currently able to work due to her chronic medical condition. I am still not able to offer a firm timeframe for return to work. I have been keeping Qsuper updated on request, with last report to them written 04/08/2025 and emailed 05/08/2025.

I will review her sometime around late December 2025 to early January 2026 and issue an updated recommendation then.

She tells me she has been subject to disciplinary action as of 16/09/2025. I can confirm that I would have considered her still unfit to work on that date as she has been since 24th March 2025.

This Certificate was completed on 22/9/2025.



Dr Rory Compton
MBBS FRACGP
476373KH

CONFIDENTIAL

Holly Dahm
[REDACTED]
[REDACTED]

By email: hollyteganosborne@hotmail.com ; hollydahm@pm.me ;
hollydahm@proton.me

Dear Ms Dahm

DECISION ON DISCIPLINARY ACTION

1. On 21 November 2025, I sent you a letter in which I found the following allegation substantiated:

Between 19 August 2025 and 15 September 2025, you have failed to comply with directions issued to you by Chris Charalambous, A/Chief Human Resource Officer, Treasury on 19 August 2025, and have posted various inappropriate comments on LinkedIn about Treasury employees and Treasury itself, which reflect adversely on Treasury.

2. On the basis of my findings in relation to the allegation, I determined that pursuant to s 91(1)(b) of the *Public Sector Act 2022 (PS Act)* you are guilty of misconduct, that is inappropriate or improper conduct in a private capacity that reflects seriously and adversely on the public sector entity in which you are employed (Queensland Treasury) within the meaning of s 91(5)(b) of the PS Act.
3. I afforded you a period of seven days from your receipt of my letter dated 21 November 2025 (**Disciplinary Findings Letter**) to show cause as to why the disciplinary action of termination of your employment should not be taken.
4. To date, you have not provided any response to the Disciplinary Findings Letter, despite **thirteen** days elapsing since its issue.

1 William Street
GPO Box 611 Brisbane
Queensland 4001 Australia
Telephone +61 7 3035 1933
Website www.treasury.qld.gov.au
ABN 90 856 020 239

5. I am satisfied that you received the Disciplinary Findings Letter, because the Letter was emailed to your email address as known to Queensland Treasury and you have not advised of a change to your contact details. Further, my email to you dated 21 November 2025 to your known email address was successfully delivered and did not return as undeliverable.
6. I am satisfied that Queensland Treasury has taken reasonable steps to make you aware of my Disciplinary Findings Letter and that you have elected not to provide a response to it, despite having the opportunity to do so within a reasonable time.
7. Accordingly, I will make a decision based on the information currently available to me, as to whether you are liable to disciplinary action and, if so, the appropriate action to impose. To that end, I have been delegated the functions of the chief executive under the PS Act for this matter.

DECISION ON DISCIPLINARY ACTION

8. I have independently reached my own conclusion regarding the matter. I have carefully considered all of the material before me. The fact that a particular matter is not specifically addressed in this letter does not mean that I did not carefully consider it.
9. I have carefully considered all of the evidence available to me in relation to the above substantiated allegation. You did not respond to the Disciplinary Findings Letter and have therefore not made any submissions about matters you consider I should take into consideration in relation to the appropriateness of the proposed disciplinary action, nor have you objected to the proposed penalty.
10. In reaching my decision on disciplinary action to be taken, I have had regard to the following:
 - a. At all times since 8 July 2024, you have been employed by Queensland Treasury as a Principal HR Consultant – Employment Relations (AO7) in the People and Culture Branch, and at all times since 24 March 2025 you have been absent from work on a period of leave.
 - b. You have at all relevant times been required to ensure that your personal

conduct maintains the integrity of the public service and your ability to perform your duties (s 1.5 of the Code of Conduct for the Queensland Public Service, with which you are required to comply), and you have been required to ensure that your personal conduct did not reflect adversely on the reputation of the public sector entity in which you are employed (s 40(1)(k) of the PS Act).

- c. At all times relevant to the allegation, you had a LinkedIn account in your own name, which was publicly accessible, which listed Queensland Treasury as your employer, and which had in excess of 5,800 followers.
- d. On 29 July 2025, Ms Jasmine Glaister, A/Director, People and Culture, Queensland Treasury, sent you an email reminding you to be mindful of what you shared on public platforms such as LinkedIn. You did not respond to Ms Glaister's email. She sent you another email on 29 July 2025, requesting that you remove any reference from your LinkedIn profile to Queensland Treasury being your employer, by close of business on 30 July 2025.
- e. You did not comply with Ms Glaister's request. By letter dated 19 August 2025, Mr Charalambous issued you with numerous directions regarding making posts on LinkedIn or any other social media platform.
- f. In my Disciplinary Findings Letter, I found that you have repeatedly and deliberately failed to comply with Mr Charalambous' directions issued on 19 August 2025, and failed to provide any explanation or excuse for your non-compliance. I have found that, contrary to Mr Charalambous' lawful and reasonable directions issued, you:
 - i. Failed to remove from your publicly accessible LinkedIn profile, posts which contained disparaging and highly offensive comments and accusations about Queensland Treasury employees;
 - ii. Continued to refer to Queensland Treasury as your employer on your LinkedIn profile page;
 - iii. Posted numerous posts on your LinkedIn profile since receiving

Mr Charalambous' directions, which contained highly inappropriate, offensive and derogatory comments about Queensland Treasury and its employees;

iv. Posted on your LinkedIn profile, confidential correspondence provided by Mr Charalambous to you on 21 August 2025, and on 2 September 2025, posted on your LinkedIn profile a recording of a confidential welfare check phone call Mr Charalambous made to you on 26 August 2025.

g. I found that it was very concerning that you had repeatedly disregarded Mr Charalambous' clear, lawful and reasonable directions, in particular that you had made repeated serious accusations and insulting comments about the conduct of Queensland Treasury employees in a public forum where the people about whom you wrote could not properly respond.

h. I found that it was a very serious matter to make accusations of improper conduct against public sector employees, including accusations of criminal conduct, particularly in a public forum such as LinkedIn where it is apparent that you are a Queensland Treasury employee, and to disregard, on a repeated basis, lawful and reasonable directions issued to you in the context of your employment.

i. I found that the manner in which you had intentionally disregarded Mr Charalambous' directions was highly disrespectful; your conduct was entirely inconsistent with your obligations as a Queensland Treasury employee and public sector employee generally under the PS Act, which is to maintain the highest standards of ethical conduct; and your conduct had the significant potential to damage the reputation of Queensland Treasury and reflect seriously and adversely on the Queensland public sector.

11. Your employment as a Principal HR Consultant – Employment Relations (AO7) comes with the requirement for a high degree of trust and confidence. I am satisfied that at all times relevant to the allegation, you were well aware, or ought to have been well aware of the requirement to comply with lawful and reasonable directions issued to you by Queensland Treasury, and more

generally, your obligations under the Code of Conduct.

Your repeated refusal to comply with Mr Charalambous' directions, and the serious and highly offensive and inappropriate nature of your posts on LinkedIn, demonstrate to me a repeated and conscious disregard and refusal on your part to comply with the directions of your employer and therefore, the terms and conditions of your employment.

12. Overall, I find your conduct was unacceptable, inexcusable, extremely serious and fundamentally inconsistent with the role of a Principal HR Consultant – Employment Relations (AO7) and the standards expected of an employee of Queensland Treasury. Your conduct demonstrates a complete disregard for the obligations arising from your special position of trust and confidence as placed in you by Queensland Treasury, and contempt for Queensland Treasury and its employees.
13. I am significantly troubled that throughout the disciplinary process, you have failed to engage in the process and have not acknowledged nor accepted any wrongdoing in relation to your conduct that is the subject to the allegation. Accordingly, your failure to respond to the allegation and to respond to my letters throughout this disciplinary process, has significantly undermined my trust and confidence in you as an employee of Queensland Treasury.
14. Trust and confidence is an essential part of any employment relationship. However, you have broken Queensland Treasury's and the community's trust in you by engaging in the inappropriate conduct. Your conduct has caused me to lose trust and confidence in your ability to perform your duties to the standard expected of a Principal HR Consultant – Employment Relations (AO7) and a public sector employee. I do not consider that this trust and confidence can be recovered.
15. Due to your failure to provide any response to my letters dated 16 September 2025 and the Disciplinary Findings Letter dated 21 November 2025, I am satisfied you have shown no remorse for your actions; no insight into the seriousness of your conduct; you have not taken responsibility for your actions; and have not provided any indication that you are dedicated to your role as Principal HR Consultant – Employment Relations (AO7) at Queensland Treasury. You have

also failed to provide me with any response in relation to any mitigating factors or personal circumstances you wish me to consider or the potential disciplinary action to be imposed.

16. Notwithstanding the lack of submissions from you, I have taken into account your length of service with Queensland Treasury of approximately 2.6 years (cumulative). I have also had regard to your overall work record, namely your previous unblemished disciplinary record during your employment with Queensland Treasury. However, I do not consider that these factors outweigh the extreme seriousness of your conduct on this occasion, which falls well below the standard expected of an employee of Queensland Treasury.
17. You have not provided me with any submissions with respect to any financial or personal circumstances you wish me to consider when determining my decision on disciplinary action. For completeness, I acknowledge that while there may be financial repercussions for you if your employment as a Principal HR Consultant – Employment Relations (AO7) was to be terminated due to your conduct, I do not consider any such circumstances would outweigh the seriousness of your conduct.
18. I consider the conduct you have engaged in to be extremely serious, falling well below the standards expected of you as a Principal HR Consultant – Employment Relations (AO7) and public sector employee generally. You have demonstrated behaviour that is inconsistent with the standards expected not only of employees of Queensland Treasury, but all public servants. Your behaviour, which concerningly was repeated, was highly inappropriate and unprofessional. Your conduct also calls into question whether you are capable of making ethical decisions, complying with directions, or acting with honesty and integrity in the future.
19. You have not made any submissions as to why the proposed disciplinary action should not be imposed, nor provided me with any alternative disciplinary action you wish me to consider, despite having the opportunity to do so. For completeness, I do not consider the imposition of an alternative penalty would adequately reflect the seriousness of your conduct or would be appropriate in the circumstances. I consider the proposed penalty of termination of your

employment is an appropriate consequence in response to your conduct because it demonstrates the seriousness with which Queensland Treasury views your conduct, and further demonstrates that such conduct exhibited by Queensland Treasury employees will not be tolerated in the future.

20. In light of all of the circumstances, particularly the seriousness of your conduct, I have no trust and confidence in your ability to perform duties to the standard expected of a Principal HR Consultant – Employment Relations (AO7). Further, I have no trust or confidence that you would not engage in similar behaviour in the future. Ultimately, I have lost trust and confidence in your ability to discharge your duties as a Principal HR Consultant – Employment Relations (AO7).
21. Having regard to the seriousness of your conduct, your blatant disregard for your obligations as a Queensland Treasury employee, and the fact your conduct had the significant potential to damage the reputation of Queensland Treasury and reflect seriously and adversely on the Queensland public sector generally, I am satisfied the termination of your employment as a Principal HR Consultant – Employment Relations (AO7) is a fair and just penalty in the circumstances, and adequately reflects the seriousness with which I view your conduct.
22. Accordingly, I have determined to take the disciplinary action of **termination of your employment effective immediately** from the date of your receipt of this letter. You will be paid an amount in lieu of notice, together with any outstanding leave accruals, in accordance with your industrial entitlements.

HUMAN RIGHTS

23. I have considered the relevant sections of the *Human Rights Act 2019* when determining to impose the disciplinary action of termination of your employment.
24. In my view, the human rights potentially impacted by the decision to terminate your employment, include the right to participate in public life (through employment in the public sector), the right to privacy, and right to reputation (which extends to professional relations and reputation).
25. I acknowledge that my decision to impose the disciplinary action of terminating

your employment may impact and potentially limit your human rights including the right to take part in public life, right to privacy and the right to reputation, which extends to protect professional relationships and reputation. This is because the disciplinary action will form part of your formal disciplinary history and may need to be disclosed in certain circumstances. This may for instance have a negative impact on your prospects of obtaining employment elsewhere in the public sector in the future. However, in my view, any limitation is demonstrably justified. This is because it is in the public interest to ensure that public sector employees comply with the lawful and reasonable directions given to them, and that they conduct themselves appropriately and properly where their conduct in a private capacity might reflect seriously and adversely on the public sector entity in which they are employed. I consider that this outweighs the limited potential impact on your human rights.

26. Further, throughout the disciplinary process, you have been afforded procedural fairness and an opportunity to respond to the proposed disciplinary findings and proposed disciplinary action. It has been your own choice not to avail yourself of that opportunity.
27. Accordingly, I consider that my decision to make disciplinary findings and to take the disciplinary action of the termination of your employment is compatible with human rights under the *Human Rights Act*.

APPLICATION FOR REINSTATEMENT

28. You may lodge an application for reinstatement in accordance with Chapter 8, Part 2 of the *Industrial Relations Act 2016* (Qld) with the Queensland Industrial Relations Commission within **21 calendar days** of receipt of this letter.
29. Information about lodging an application for reinstatement can be obtained from the website www.qirc.qld.gov.au.

DISCLOSURE REQUIREMENTS

30. Chapter 3, Part 5, Division 5 of the PS Act provides that applicants (when applying for employment with the Queensland public sector) may be required to disclose their previous history of serious disciplinary action (this includes the decision to terminate your employment). This requirement is reflected in the Recruitment

and Selection Directive 07/23.

EMPLOYEE ASSISTANCE SERVICE

31. Queensland Treasury's Employee Assistance Service, provided through TELUS Health, will be made available to you for a period of **three** weeks from the date of this letter should you wish to contact them. TELUS Health provides a free and confidential counselling and support service that is available 24 hours a day, 7 days a week on 1800 604 640.

Yours sincerely



Drew Ellem
Deputy Under Treasurer
Corporate and Executive Services
Queensland Treasury

5 / 12 / 2025

CANCER CARE SERVICES
Department of Radiation Oncology

Director: Dr Penny Mackenzie
Deputy Director: Dr Catherine Bettington
Assoc Prof Ben Chua
Assoc Prof Charles Lin
Dr Samantha McLaughlin
Dr Philip Chan
Dr Robyn Cheuk
Dr Rachel Effenev
Dr Michelle Grogan
Dr Christopher Williams
Dr Dione Liefman



Metro North
Hospital and Health Service
Clinic Date: 24/12/2025
Dictated: 29/12/2025
Typed: : RC/
Job no: 2763183

To Whom It May Concern

Re: Holly Dahm UR: 1308593 DOB: 23/08/1985

Holly was diagnosed with an early right breast cancer in July 2024 and was treated with breast conserving surgery including axillary node biopsy and post operative right breast radiotherapy which was completed in Dec 2024.

During her radiotherapy, Holly developed a sero negative polyarthralgia which is ongoing and she has persistent generalised fatigue and lethargy. She has also more recently developed a chronic dry cough which she is being investigated for currently. She has been using a steroid inhaler for this cough with minimal benefit. As a result of her ongoing joint pain and chronic fatigue as well as the newer symptom of worsening chronic cough, Holly has been unable to return to her work as a HR consultant for QLD Treasury.

Holly is scheduled to have a CT scan of the neck/chest/abdomen to assess her cough and her joint pains (especially in her neck and thoracic spine, with radiating pain to her chest wall). She is due to be reviewed after this investigation to decide on her future management - currently she remains on an inhaled steroid and may benefit from a further course of oral steroids depending on her scan results. She is on simple oral analgesics and anti inflammatory agents for her joint pains at present.

Due to Holly's current chronic fatigue, joint stiffness and pain that affects her mobility and manual dexterity and her cough that results in episodes of dry wretching regularly and limits her physical activity, Holly is unable to return to her usual work and she is unable to work in a lesser duties capacity. Holly is still being investigated for her symptoms currently.

At present Holly will need to remain unable to perform her usual work and unable to be trained to do alternative work for the next 3 months (from 29/12/25 to 6/4/26 inclusive). This will need to be reassessed after that time.

Yours sincerely

Electronically signed by Dr Robyn Cheuk at 4:22 PM on 29/12/2025

Dr Robyn Cheuk

Royal Brisbane and Women's Hospital
Butterfield Street
Herston, QLD 4000

Appointments:
Phone: 07 3646 7751
Phone: 07 3646 7750

Clinic Nurses:
Phone: 07 3646 2198
Phone: 07 3646 4400



MBBS, FRANZCR
Senior Radiation Oncologist
Provider no: 0450152W

CC:



Family Practice

Family Practice
Shop 1, 81 Gawain Road, QLD 401
PH: 07 3261 8804 FAX: 07 3261 2469
info@brackenridgedoctors.com.au

Medical Certificate

31/03/2026

THIS IS TO CERTIFY THAT

Mrs Holly Dahm has a medical condition and will be unfit for work from 31/03/2026 to 30/06/2026 inclusive.

Dr Surendar Advani
654737GT
MBBS FRACGP



Family Practice

Family Practice
Shop 1, 81 Gawain Road, QLD 401
PH: 07 3261 8804 FAX: 07 3261 2469
info@brackenridgedoctors.com.au

Medical Certificate

29/05/2026

THIS IS TO CERTIFY THAT

Mrs Holly Dahm has a medical condition and will be unfit for work from 29/05/2026 to 28/08/2026 inclusive.

Dr Surendar Advani
654737GT
MBBS FRACGP

PSA/2025/205 - Dahm, Holly v State of Queensland (Queensland Treasury)

From: QIRC.Registry
QIRC.Registry@QIRC.qld.gov.au

To: hollydahm@proton.me
hollydahm@proton.me
humanresources@treasury.qld.gov.au
humanresources@treasury.qld.gov.au
corporate-mailbox@treasury.qld.gov.au
corporate-mailbox@treasury.qld.gov.au

On: Friday 17 October 2025 at 10:44:04 am

Dear Parties,

Commissioner Dwyer notes Ms Dahm's medical situation.

Please be advised that this matter will be placed into abeyance until Ms Dahm advises the Commission that she is fit to proceed.

This email is sent on behalf of the chambers of Industrial Commissioner Dwyer.

Kind Regards,

Registry Officer (Client Services)
Industrial Registry



**Industrial Court of Queensland and
Queensland Industrial Relations Commission**

P 07 3237 6044

E QIRC.Registry@qirc.qld.gov.au

Level 21, Central Plaza 2, 66 Eagle Street, Brisbane QLD 4000

GPO Box 373, Brisbane QLD 4001

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viruses or defects as this message is transmitted over Internet. We collect personal information as required to discharge our functions under the various legislation relevant to the ICQ, QIRC and Industrial Registry. The way we manage personal information is explained in our Privacy Policy available on the website.



About the F9A response form

Employer's response to application for the FWC to deal with an unlawful termination dispute

About unlawful termination

Certain employees (see below) may make an application to the Fair Work Commission (Commission) to deal with a dispute under the unlawful termination provisions of the [Fair Work Act 2009](#).

The unlawful termination provisions make it unlawful for an employer to terminate an employee's employment for one or more unlawful reasons (for example, disability, temporary absence from work because of illness, trade union membership, etc.).

Unlawful termination applications can be made by:

- employees who are not in the national system, or
- national system employees who are not entitled to make a general protections application (see, for example, *McIntyre v Special Broadcasting Services Corporation T/A SBS Corporation* [2015] FWC 6768), or
- industrial associations entitled to represent the industrial interests of such employees.

There are provisions in the *Fair Work Act 2009* that are designed to prevent multiple claims being lodged for the same dismissal (see subdivision B of Division 3, Part 6-1). For more information about the different types of dismissal claims, see [Termination of employment](#) on the Commission's website.

Once an employee alleges that his or her employment was terminated by the employer for an unlawful reason, it is presumed that the employee's employment was terminated for that reason unless the employer can prove otherwise.

The Commission will try to assist the parties to resolve the dispute by mediation or conciliation. If the Commission is satisfied that all reasonable attempts to resolve the dispute are likely to be unsuccessful, a certificate will be issued (s.776). Once the certificate is issued, the parties can notify the Commission using the Form F9B if they agree to the dispute being arbitrated (s.777).

Alternatively, the Applicant can make an application to a court to deal with the matter (s.778).

For more information about unlawful terminations and eligibility to make an application, please see the Commission's [unlawful termination guide](#).

Who can use this form

Use this form if you are an employer or are responding for an employer and the Commission has served the employer with an application for the Commission to deal with an unlawful termination dispute (Form F9).

If the employer has been served with two or more Form F9 applications concerning the same or substantially similar circumstances, you can lodge one response for all of the applications if the employer's response is substantially the same for each application. If necessary, you can attach details of each individual applicant to whom your response relates (including name, date of commencement and entitlements) in a separate sheet.

If the employer has received multiple applications

If an employer receives 2 or more Form F9 unlawful termination applications and:

- the applications allege the same or substantially similar conduct, and
- the employer's response is substantially the same for each application

the employer (Respondent) can lodge **1 response** with the Commission dealing with all applications.

Lodgment and service of your completed form

1. **Lodge this response form and any supporting documents** with the Commission within **7 days** after the employer was served with the Form F9 application.

You can lodge:

- by email to lodge@fwc.gov.au, or
- by post or in person at the [Commission's office](#) in your state or territory.

2. **Serve a copy of all documents you lodged with the Commission** on the Applicant. An easy way to do this is to copy the Applicant into the email you send to the Commission.

Otherwise, you must send the documents to the Applicant **within 7 days** after the employer was served with the Form F9 application. You can serve documents several ways, including by email, express post or registered post. Make sure you send the documents to the email or postal address specified in the Form F9 application.

Where to get help

Commission staff & resources

Commission staff cannot provide legal advice. However, staff can give you information on:

- Commission processes
- how to make an application to the Commission
- how to fill out forms
- where to find useful documents such as legislation and decisions
- other organisations that may be able to assist you.

The Commission's website www.fwc.gov.au also contains a range of information that may assist.

Throughout this form



This icon appears throughout the form. It indicates information to help you complete the form.

Legal or other representation

Representation is where another person speaks or acts on your behalf, or assists you in certain other ways in relation to a matter. A representative could be a lawyer, paid agent, officer or employee of an employer organisation, an association of employers or a peak council, or a not-for-profit association or body that provides support, advice or advocacy in relation to employment matters.

You do not have to be represented in a case at the Commission.

There are some rules about when a lawyer or paid agent can represent you.

Unless the Commission decides otherwise in a particular case, you do not need permission for a lawyer or paid agent to:

- prepare and lodge this response,
- prepare and lodge submissions about your case, or
- write to the Commission and other people involved in your case on your behalf.

Generally, you must give notice to the Commission and seek permission from the Commission Member dealing with your case if you wish to have a **lawyer or paid agent** represent you in a **conference or hearing with a Commission Member**. You do not, however, need to give notice or ask permission if the lawyer or paid agent is:

- your employee or officer (for a business), or
- an employee or officer of an employer organisation, an association of employers or a peak council that is representing you.

You can notify the Commission that you have a lawyer or paid agent using this form – provide their details at ‘Does the employer have a representative?’.

If you need to notify the Commission that you have a lawyer or paid agent after you have lodged this form, or if you need to ask permission for a lawyer or paid agent to take part in a **conference or hearing**, use [Form F53](#).

For more information about representation by lawyers and paid agents, see section 596 of the [Fair Work Act 2009](#), rules 11, 12, 13 and 14 of the [Fair Work Commission Rules 2024](#), information about [representatives and the rules they must follow](#), and the Commission’s [practice note on representation by lawyers and paid agents](#).

Glossary of common terms

Applicant – This is the person or organisation that is making an application.

Jurisdictional objection – This is a type of objection a Respondent can raise to an application.

A Respondent can make this kind of objection if they think that the Commission, for a technical or legal reason, cannot hear the matter.

Lawyer – This is a person who is admitted to the legal profession by a Supreme Court of a State or Territory.

Paid agent – in relation to a matter before the Commission, is an agent (other than a bargaining representative) who charges or receives a fee to represent a person in the matter.

Party – A party is an Applicant, Respondent, or another person or organisation involved in a matter or case that is brought to the Commission.

Respondent – The person or organisation responding to an application made by an Applicant.

Service – Serving a document means giving a copy of the document to a person or organisation, usually to the other party to the matter. You can serve a document in a number of ways, including by email, express or registered post, or in person. Part 5 of Chapter 1, rule 72 and Schedule 1 of the [Fair Work Commission Rules 2024](#) deal with service.

Privacy

The Commission collects the information (including personal information) provided to it in this form in order to deal with the unlawful termination dispute application. The information will be included on the case file, and the Commission may disclose the information to the other parties to this matter and to other persons. For more details of the Commission's collection, use and disclosure of this information, please see the [Privacy notice](#) for this form, or ask for a hard copy to be provided to you.



Remove this cover sheet and keep it for future reference – it contains useful information.

Form F9A – Employer’s response to application for the FWC to deal with an unlawful termination dispute

Fair Work Commission Rules 2024, Rules 68, 70 and 72 and Schedule 1

This is a response to an application for the Fair Work Commission (the Commission) to deal with an unlawful termination dispute under Part 6-4 of the Fair Work Act 2009.

The Applicant



These are the details of the person who made the application. You can find this information on the application for the Commission to deal with an unlawful termination dispute Form F9.

Name	Holly Tegan Dahm
Commission matter number	C2026/9566

The Respondent (the employer)



These are the details of the employer responding to the application.

Legal name of employer	State of Queensland		
Employer’s ACN (if a company)			
Trading name or registered business name			
ABN			
Contact person	Aimee de Pass, Principal Lawyer for the Crown Solicitor, Crown Law		
Postal address	GPO Box 5221		
Suburb	Brisbane		
State or territory	QLD	Postcode	4001
Phone number	07 3031 5706		
Email address	aimee.depasse@crownlaw.qld.gov.au		
What industry is the employer in?	State Public Sector		

Has the Applicant given the correct legal name of the employer in their application for the Commission to deal with an unlawful termination dispute (Form F9)?

☐ Yes

☒ No

How would the employer prefer us to send communications?

- ☒ Email (you will need to make sure you check your email account regularly)
- ☐ Post

Does the employer need an interpreter?



If the employer has trouble accessing this information, please contact us. We can arrange to provide it in another format. You can find information about [help for non-English speakers](#) on our website.

☐ Yes – Specify language

☒ No

Does the employer require any special assistance at the hearing or conference (eg a hearing loop)?

☐ Yes – Please specify the assistance required

☒ No

Does the employer have a representative?



A representative is a person or organisation who is representing the employer. This might be a lawyer or paid agent, or an employer association. There is no requirement to have a representative.

☒ Yes – Provide representative's details below

☐ No

Employer's representative



These are the details of the person or organisation who is representing the employer (if any).

Name of person	Aimee de Pass, Principal Lawyer		
Firm, employer organisation or company	Crown Law		
Representative's ABN (if applicable)			
Postal address	GPO Box 5221		
Suburb	Brisbane		
State or territory	QLD	Postcode	4001
Phone number	(07) 3031 5708		

Email address	aimee.depass@crownlaw.qld.gov.au
---------------	--

Is the employer's representative a lawyer or paid agent?

☒ Yes – please select:	☒ Lawyer (employed by the Respondent – State of Queensland) ☐ Paid agent
☐ No	

1. Termination of employment

1.1 What date did the employer notify the Applicant of the termination of their employment?

5 December 2025

1.2 What date did the termination take effect?

5 December 2025

2. Objections

2.1 Does the employer have any jurisdictional or other objections to the application?



Jurisdictional objections relate to why an employee is not eligible to make an application to the Commission. An objection is not simply that you think that the employee's termination was lawful. See the Commission's [unlawful termination guide](#) for more information.

☒ Yes

☐ No

If you answered **Yes** – On what basis does the employer object? If the employer objects on multiple grounds you can select more than one from the list below:

☒ The application is out of time (ie lodged more than 21 days after the termination took effect)

☐ The Applicant is entitled to make a general protections court application

☒ The Applicant has made another application or complaint about the termination of his or her employment (such as, an unfair dismissal application or complaint to the Australian Human Rights Commission)

☒ Other

Explain why the employer objects on these grounds. Attach extra pages if necessary.

Please refer to **Schedule 1**. The Respondent's jurisdictional objections are that:

1. Ms Dahm has not made her application within 21 days after her employment was terminated (as required by s 774(1) of the *Fair Work Act 2009* (Cth) (**FW Act**)), and there are no other exceptional circumstances that warrant the FWC allowing a further period under s 774(2) of the FW Act.
2. Further or in the alternative, Chapter 6, Part 6-4 of the FW Act does not apply to the State of Queensland because of the implied limitation on Commonwealth legislative power with respect to State system employees, a limitation also reflected in the *Fair Work (Commonwealth Powers) and Other Provisions Act 2009* (Qld), which by s 6 specifically excludes from matters referred to the Commonwealth Parliament those relating to public sector employees and employers.
3. Further or in the alternative, Ms Dahm has contended in her FW Application that she has made other applications in relation to her dismissal in the Supreme Court of Queensland and the Industrial Court of Queensland. Therefore, pursuant to sections 725 and 732 of the FW Act, Ms Dahm is barred from making the FW Application.

3. Alleged contraventions

3.1 Does the employer agree with the information given in question 3 on the Applicant's Form F9?



Section 772 of the [Fair Work Act 2009](#) sets out a list of unlawful reasons for terminating an employee's employment.

☐ Yes

☒ No

If you answered **No** – On what basis does the employer disagree?

☒ The Applicant's employment was not terminated for an unlawful reason

☐ The Applicant's employment was terminated for a reason based on the inherent requirements of the particular position concerned

☐ The Applicant was a member of staff of an institution that is conducted in accordance with doctrines, tenets, beliefs or teachings of a particular religion or creed and was terminated in good faith and to avoid injury to the religious susceptibilities of adherents of that religion or creed

☐ Other

Explain why the employer disagrees. Attach extra pages if necessary.

1. Noting the Fair Work Commission (**FWC**) does not have jurisdiction to deal with the application for the reasons detailed in Schedule 1, the Respondent does not propose to provide a response to the allegations made by Ms Dahm in her application.
2. However, for completeness, the Respondent denies any allegations it engaged in conduct that contravened part 6-4 of the *Fair Work Act 2009* (Cth) (**FW Act**). The Respondent reserves its rights to make any further submissions regarding this point if the FWC does not accept the Respondent's jurisdictional objections to the FW Application.

4. Remedy

4.1 Does the employer agree with the remedy the Applicant is seeking?

☐ Yes

☒ No

If you answered **No** – Explain why. Attach extra pages if necessary.

1. Noting the FWC does not have jurisdiction to deal with the Application for the reasons detailed in Schedule 1, the Respondent does not propose to provide a response to the outcome/s sought by Ms Dahm.
2. The Respondent respectfully requests that the application be dismissed for want of jurisdiction.
3. The FWC has power under ss 587(1)(a) and (c) of the FW Act to dismiss an application that, relevantly, is not made in accordance with the FW Act and has no reasonable prospects of success. However the Full Court has also expressed in obiter in *Coles Supply Chain Pty Ltd v Milford* [2020] FCAFC 152 [69] that the '*better view*' is:

[...] It is not necessary to identify an express power in the FWC to decline to act upon an application on the basis that it fails for want of jurisdiction. It may be that an application purportedly made by a person having no entitlement to make it is not an 'application' for the purposes of s 587(1)(a) at all. Section 587(1)(a) has work to do in cases where an otherwise valid application has not been made in accordance with procedural rules made under the FW Act. The statutory note suggests that is its purpose (although the note does not form a part of the Act): see s 40A of the FW Act.

Disclosure of information

The Commission will provide a copy of this response and any attachments to the other parties in this matter. This includes:

- the Applicant
- any legal representatives.

Consent to contact by researchers

The Commission undertakes research with participants in unlawful termination matters to ensure a high quality process. Some research may be undertaken by external providers on behalf of the Commission.

Do you consent to the contact details provided on page 1 of this form being provided to an external provider of research services for the sole purpose of inviting you to participate in this research?

☐ Yes

☒ No

Authority to sign and signature



For 'Authority to sign':

- If you are the Respondent—insert 'Respondent'
- If you are an employee of a company or organisation that is the Respondent—insert your position title
- If you are the Respondent's representative and have provided your details in this form—insert 'Representative'.

Authority to sign	Representative
-------------------	----------------



Insert your signature, name and the date. If you are completing this form electronically and do not have an electronic signature, type your name in the signature field.

Signature	
Name	Catriona McPherson (Assistant Crown Solicitor) for CE Christensen, Crown Solicitor
Date	5 August 2026

PLEASE RETAIN A COPY OF THIS FORM FOR YOUR OWN RECORDS

Schedule 1: Jurisdictional objections

Overview

1. The Respondent's position is that the Fair Work Commission (**FWC**) does not have jurisdiction to deal with the unlawful termination application Ms Dahm made under s 773 of the *Fair Work Act 2009* (Cth) (**FW Act**) on 24 July 2026 (**FW Application**). This is because:
 - a. Ms Dahm has not made the FW Application within 21 days after her employment was terminated (as required by s 774(1) of the FW Act), and there are no other exceptional circumstances that warrant the FWC allowing a further period of time for lodgement under s 774(2) of the FW Act.
 - b. Further or in the alternative, Chapter 6, Part 6-4 of the FW Act does not apply to the State of Queensland because of the implied limitation on Commonwealth legislative power with respect to State system employees, a limitation also reflected in the *Fair Work (Commonwealth Powers) and Other Provisions Act 2009* (Qld), which by s 6 specifically excludes from matters referred to the Commonwealth Parliament those relating to public sector employees and employers.
 - c. Further or in the alternative, Ms Dahm has contended in her FW Application that she has made other applications in relation to her dismissal in the Supreme Court of Queensland and the Industrial Court of Queensland. Therefore, pursuant to sections 725 and 732 of the FW Act, Ms Dahm is barred from making the FW Application.

Jurisdictional Objection 1: Out of time

2. The Respondent submits that Ms Dahm has not made the FW Application within 21 days after her employment was terminated, and there are no exceptional circumstances that warrant the FWC allowing a further period under s 774(2) of the FW Act.
3. Section 774(1) of the FW Act requires unlawful termination applications under s 773 of the FW Act to be made within 21 days after the employment was terminated, or within such further period as allowed under s 774(2) of the FW Act.
4. Ms Dahm was dismissed from her employment on 5 December 2025. This meant that Ms Dahm had until Tuesday 30 December 2025 to lodge her application (noting Friday 26 December was a public holiday, 27 December and 28 December fell over the weekend, and Monday 29 December was an additional holiday, meaning the Fair Work Commission Registry was closed). Refer to s 36(2) of the *Acts Interpretation Act 1901* (Cth).
5. However, Ms Dahm lodged the FW Application in the FWC on 24 July 2026. This is 206 days, or six months and 25 days, after the 21 day filing period ended under s 774(1)(a) of the FW Act.
6. For the FWC to exercise its discretion under s 774(2) of the FW Act to allow Ms Dahm a further period to make the FW Application, it must be satisfied that there are exceptional circumstances to extend time.
7. 'Exceptional circumstances' mean circumstances that are out of the ordinary course, or unusual, or special, or uncommon but need not be unique, or unprecedented, or very rare: *Nulty v Blue Start Group Pty Ltd* [2011] FWA 975 at [13].

Reason for the delay

8. Ms Dahm accepts that she did not file the FW Application within 21 days of the termination of her employment.
9. Ms Dahm alleges that the reason for the delay is because she was medically incapacitated, and her incapacity materially affected her ability to organise records, identify the correct legal pathway, obtain assistance, prepare the application and complete lodgement within time.
10. In support of this, Ms Dahm has provided various medical certificates with her application, one undated but seemingly provided around 22 April 2025, and others dated 22 September 2025, 29 December 2025, 31 March 2026, 29 May 2026, to the effect that she was unfit for work up to and including 28 August 2026. These medical certificates do not state that Ms Dahm was incapable of lodging the FW Application, or that Ms Dahm's ability to organise records, identify the correct legal pathway, obtain assistance, prepare the application and complete lodgement within time was affected.
11. Further, while Ms Dahm alleges that she was unable to lodge the FW Application within 21 days of the termination of her employment because she was incapacitated, she concedes at item 2.4 of the FW Application that she has made six claims as follows:
 - a. A public service appeal (PSA/2025/205) Ms Dahm filed in the Queensland Industrial Relations Commission (**QIRC**), which was dismissed on 13 November 2025 (**Attachment 1**). By way of further context:
 - i. On 8 October 2025, Ms Dahm filed the public service appeal in relation to the notice to show cause to the Respondent issued on 17 September 2025.
 - ii. On 15 October 2025, the matter was listed for mention on 21 October 2025. On the same day, Ms Dahm emailed the QIRC saying that she was '*... unable to participate in any hearing or mention at this stage and respectfully request that the matter be deferred pending the next medical review.*'
 - iii. On 17 October 2025, the registry emailed Ms Dahm and the Respondent and stated '*Please be advised that this matter will be placed into abeyance until Ms Dahm advises the Commission that she is fit to proceed.*'
 - iv. On 5 November 2025, Ms Dahm filed an application to appeal in the Industrial Court of Queensland, seeking to appeal the decision of 17 October 2025.
 - v. On 7 November 2025, the Industrial Registry informed Ms Dahm that her form 5 had not been accepted for filing as the decision is not an appealable decision.
 - vi. On 13 November 2025, a mention was held in the QIRC in relation to Ms Dahm's public sector appeal. Ms Dahm did not attend the mention. The public service appeal was dismissed under rule 45 of the *Industrial Relations (Tribunal) Rules*, on the basis that she did not comply with the direction to attend.
 - b. On 23 December 2025, Ms Dahm filed a Form 13 – Application for Payment Instead of Taking Long Service Leave in the QIRC, pursuant to s 110 of the *Industrial Relations Act*

2016 (Qld) (**IR Act**).

- c. On 24 December 2025, Ms Dahm filed a public sector appeal in the QIRC in relation to the termination of her employment. For completeness, a public sector appeal may not be made in relation to termination of employment: refer to s 132(1)(e) of the *Public Sector Act 2022* (Qld) (**PS Act**). In the FW Application, Ms Dahm states that the QIRC did not accept the document for filing.
 - d. Judicial Review proceedings BS2985/26 in the Supreme Court of Queensland in relation to the applications filed in the QIRC on 23 December 2025 and 24 December 2025.
 - e. Appeals C/2026/20 and C/2026/21 in the Industrial Court of Queensland, in relation to the QIRC's decision not to accept the applications Ms Dahm filed in the QIRC on 23 December 2025 and 24 December 2025.
12. Ms Dahm has claimed that her illness affected her incapacity to lodge the FW Application within the statutory time limit. However, she admits that she has filed material in the QIRC within the statutory time limit, on 23 December 2025 and 24 December 2025. This suggests that Ms Dahm did, in fact, have capacity to lodge the FW Application with the statutory time period.
13. In the circumstances, the Respondent submits that the circumstances are not exceptional and do not reasonably excuse Ms Dahm's significant delay in filing the FW Application.

Action taken by the Applicant to dispute the dismissal

14. Since the termination of her employment on 5 December 2025, Ms Dahm concedes she has made the five applications set out at item 2.4 of her FW Application.
15. Ms Dahm did not take any effective steps to dispute the dismissal until she filed the FW Application. Ms Dahm does not offer any reason for not doing so, other than her illness. As noted above, Ms Dahm's illness did not prevent her from filing other material in the QIRC during the limitation period.
16. Therefore, the Respondent submits that the circumstances are not exceptional and do not warrant the FWC exercising its discretion to extend the time for Ms Dahm to file the FW Application.

Prejudice to the employer (including prejudice caused by the delay)

17. Ms Dahm has listed processes she has commenced at item 2.4 of the FW Application. The Respondent either has (to varying degrees) expended, or may in the future need to expend, resources in relation to some of these processes. Arguably, the Respondent will be further prejudiced by having to spend more resources defending the FW Application.
18. Even if the Commission is not satisfied that the Respondent will not be prejudiced in terms of defending the FW Application, the Respondent submits that the mere absence of prejudice to the employer caused by a short delay is not generally a factor that would point in favour the existence of exceptional circumstances: *Athari v South Western Sydney Local Health District (SWSLHD) – Liverpool Hospital* [2026] FWC 731 (**Athari**) at [17].

Merits of the application

19. The Respondent submits that the FW Application has no prospects of succeeding, noting the Respondent's jurisdictional objections concerning:
 - a. Chapter 6, Part 6-4 of the FW Act does not apply to the State of Queensland because of the implied limitation on Commonwealth legislative power with respect to State system employees, a limitation also reflected in the *Fair Work (Commonwealth Powers) and Other Provisions Act 2009* (Qld), which by s 6 specifically excludes from matters referred to the Commonwealth Parliament those relating to public sector employees and employers. ; and
 - b. Section 725 of the FW Act bars Ms Dahm's FW Application by virtue of s 732 of the FW Act.
20. These jurisdictional objections are set out further below. However, for completeness, the FWC is not required to, and does not, conduct a full inquiry into the merits of a matter, and it is sufficient for the FWC to make a preliminary assessment about whether there is any merit to the application: *Athari* at [17].
21. Therefore, noting the jurisdictional objections, the Respondent does not propose to provide a substantive response to Ms Dahm's allegations. However, and in any event, it submits that Ms Dahm's case is without merit, because there is a documented discipline process that demonstrates her employment was terminated due to her inappropriate conduct, and not for any physical or mental disability as Ms Dahm now contends in her FW Application.
22. The Respondent's disciplinary process against Ms Dahm is documented in letters from the Deputy Under Treasurer dated 16 September 2025 (**Attachment 2**), 21 November 2025 (**Attachment 3**) and 5 December 2025 (**Attachment 4**).

Fairness as between the person and other persons in a like position

23. Ms Dahm has submitted that fairness supports an extension of time, in circumstances where she remained continuously medically incapacitated, disputed the termination, and acted with assistance as her functional capacity permitted.
24. The Respondent submits that the test is (as set out in *Athari*), whether there are people in a 'similar position' to Ms Dahm, such as other employees dismissed by the Respondent at the same time.
25. Ms Dahm has not established any differential treatment between her and other employees in a like position. Therefore, the Respondent submits that Ms Dahm has not established exceptional circumstances for the FWC to exercise its discretion under section 774(1)(b) of the FW Act to grant an extension of time.

Jurisdictional objection 2: Public sector employee

1. The FWC does not have jurisdiction to deal with Ms Dahm's FW Application, because of the implied limitation on Commonwealth legislative power with respect to State system employees – the Melbourne Corporation Principle.

2. The Melbourne Corporation Principle provides that the Commonwealth cannot, by exercise of its legislative power, significantly impair, curtail or weaken the capacity of the states to exercise their constitutional powers and functions, be that legislative, executive or judicial or significantly impair, curtail or weaken the actual exercise of those powers and functions: *Australian Workers' Union of Employees, Queensland v State of Queensland (Department of Communities, Child Safety and Disability Services)* [2014] FWCFB 5546 at [20].
3. In *Australian Workers' Union of Employees, Queensland v State of Queensland (Department of Communities, Child Safety and Disability Services)* [2014] FWCFB 5546, the Full Bench of the Fair Work Commission held that an order by the FWC pursuant to sections 786 to 787 of the FW Act requiring the State of Queensland to consult with the Australian Workers' Union of Employees about the number of and identity of employees to be dismissed in circumstances of redundancy, would interfere with the exercise of the constitutional power of the State of Queensland in a significant manner (at [36]).
4. The Respondent respectfully submits that noting the decision *Australian Workers' Union of Employees, Queensland v State of Queensland (Department of Communities, Child Safety and Disability Services)* [2014] FWCFB 5546, if either the Federal Court or the Federal Circuit and Family Court of Australia made an order pursuant to s 545 of the FW Act (including to reinstate Ms Dahm, or pay Ms Dahm a pecuniary penalty), this would interfere with the Respondent's exercise of State constitutional power in a significant manner.
5. It is further submitted that the limitation of the Commonwealth's industrial relations power over Queensland State employees is also reflected in the *Fair Work (Commonwealth Powers) and Other Provisions Act 2009* (Qld), which by s 6 specifically excludes from matters referred to the Commonwealth Parliament those relating to Queensland public sector employees and employers.
6. The IR Act is a prescriptive, industrial relations legislative scheme intended to cover the field in relation to industrial relations matters concerning Queensland public sector employees. In circumstances where Ms Dahm may, by virtue of being a dismissed Queensland public sector employee, have had standing to lodge an unfair dismissal application or general protections application in the QIRC pursuant to the IR Act, it would be an abuse of process and inconsistent with the intended purpose of the IR Act for it to cover the field in respect of Queensland public sector employment, for Ms Dahm also to have concurrent standing under Part 6-4 of the FW Act.
7. On that basis alone, the Respondent submits that Ms Dahm's FW Application is entirely without merit and cannot succeed.

Jurisdictional objection 3: Other applications in relation to dismissal

1. Section 725 of the FW Act bars Ms Dahm's FW Application by virtue of s 732 of the FW Act.
2. A person who has been dismissed must not make an application or complaint of a kind referred to in any one of sections 726 to 732 in relation to the dismissal if any of those other sections applies: s 725 of the FW Act.
3. Section 732 of the FW Act concerns circumstances where an application or complaint under another law has been made by, or on behalf of, the person in relation to the dismissal, and the

application or complaint has not been withdrawn by the person who made the application, or failed for want of jurisdiction. 'Application or complaint under another law' includes applications made under a law of a State or Territory.

4. Section 725 of the FW Act is intended to prevent access to multiple remedies in relation to a dismissal.
5. Ms Dahm has contended that she has made applications in the Supreme Court of Queensland and the Industrial Court of Queensland in relation to the QIRC's decision not to accept a public service appeal she filed in the QIRC in relation to her dismissal on 24 December 2025.
6. By lodging a judicial review application and an appeal in the Industrial Court of Queensland in relation to the QIRC's decision not to accept a public service appeal in relation to her dismissal, Ms Dahm has made applications in relation to her dismissal.
7. Ms Dahm has not indicated that these applications or complaints have been withdrawn, or failed for want of jurisdiction. Accordingly, ss 725 and 732 of the FW Act can be enlivened in respect of her.

QUEENSLAND INDUSTRIAL RELATIONS COMMISSION

CITATION: *Dahm v State of Queensland (Queensland Treasury)* [2025] QIRC 318

PARTIES: **Dahm, Holly**
(Appellant)

v

State of Queensland (Queensland Treasury)
(Respondent)

CASE NO: PSA/2025/205

PROCEEDING: Public Sector Appeal – Appeal against a disciplinary decision

DELIVERED ON: 13 November 2025

MEMBER: Dwyer IC

HEARD AT: Brisbane

ORDER: **Pursuant to r 45 of the *Industrial Relations (Tribunals) Rules 2011 (Qld)*, matter number PSA/2025/205 is dismissed**

CATCHWORDS: PUBLIC SECTOR — EMPLOYEES AND SERVANTS OF THE CROWN GENERALLY – possible jurisdictional challenge – matter listed for mention – failure of appellant to attend mention – appellant deliberately evaded contact by the Commission requesting attendance – proceedings dismissed

LEGISLATION: *Industrial Relations Act 2016 (Qld)* s 562A

Industrial Relations (Tribunals) Rules 2011 (Qld) r 45

Public Sector Act 2022 (Qld)

APPEARANCES:

No appearance for the Appellant

M. Martin of Crown Law for the Respondent

Reasons for Decision
(Amended from transcript)

Introduction

- [1] Ms Holly Dahm (the appellant) is employed with the Queensland Treasury ('Treasury') as a Principal Human Resources Consultant (classification level AO7).
- [2] On 8 October 2025 Ms Dahm filed a Public Sector Appeal in the Queensland Industrial Relations Commission ('the Commission'). The appeal purports to be in relation to a 'disciplinary decision'. The purported 'disciplinary decision' is attached to the Notice of Appeal and is correspondence from Treasury dated 16 September 2025 which invites Ms Dahm to show cause why a disciplinary finding should not be made against her in respect of certain alleged misconduct.
- [3] It is trite to note that the correspondence Ms Dahm has characterised as a decision is not a decision of any type and certainly not a decision appealable under the *Public Sector Act 2022* (Qld) ('the PS Act').
- [4] Upon allocation of the file to me I noted the jurisdictional issue and listed the matter for mention on 21 October 2025 with the intent of raising this issue with the parties. A listing notice was issued on 15 October 2025.
- [5] Later on 15 October 2025, my chambers received the following email correspondence from Ms Dahm:

Dear Registry Officer,

Thank you for confirming the listing scheduled for 21 October 2025. **I note that I remain medically unfit for work, as certified under a medical certificate dated 22 September 2025, confirming continuing incapacity since 24 March 2025 with review not due until late December 2025 or early January 2026.**

Accordingly, I am unable to participate in any hearing or mention at this stage and respectfully request the matter be deferred pending the next medical review.

Please note that all correspondence relating to this matter engages Commonwealth PID jurisdiction (PID-2025-800051 / AU620871X, vested 2 June 2025) and should therefore be handled with due regard to those obligations.

I request written confirmation of the deferral and that no procedural steps be taken until medical clearance is received.

Kind regards,
Holly Dahm

(Emphasis added)

- [6] The email correspondence of 15 October 2025 attached medical certification confirming Ms Dahm was not fit to return to work. The medical certification was dated 23 June 2025 but considering the other details of Ms Dahm's medical condition that were included, I was prepared to accept her assertion that she was unfit.
- [7] In keeping with Ms Dahm's specific request that the matter be deferred, I vacated the mention listed on 21 October 2025. I then emailed the parties through my chambers on 17 October 2025, noting Ms Dahm's medical condition and relevantly saying:

Please be advised that this matter will be placed into abeyance until Ms Dahm advises the Commission she is fit to proceed.

- [8] Thereafter, a consistent stream of emails from Ms Dahm ensued. I do not intend to descend into the details of those emails other than to observe that they are replete with very disjointed references to various laws and legalese. They make little to no sense. Additionally, the list of addressees often extends over the length of the page and variously includes many, if not all, Members of the State and Commonwealth Parliament, and Justices of the Supreme Court. The content and attachments of the emails appear to predominantly relate to third parties and wholly unrelated legal matters in which Ms Dahm appears to be engaged.
- [9] On 5 November 2025, Ms Dahm attempted to file an appeal in the Industrial Court of Queensland in relation to what she alleges was my decision to place her matter into abeyance. This was a concerning development because it was Ms Dahm who had asked me to do this. In any event, placing the matter in abeyance in accordance with Ms Dahm's request to defer the matter was not a decision and therefore not able to be appealed. I note the Industrial Registry did not accept the appeal for filing.
- [10] As a consequence of continued email activity and the subsequent attempt to file further proceedings in the form of the appeal, I determined to list the matter for mention on 13 November 2025 to revisit the question of Ms Dahm's capacity to engage with her own proceedings before the Commission.

The mention on 13 November 2025

- [11] Ms Dahm was invited to attend the mention on 13 November 2025 by telephone.
- [12] Despite numerous attempts by both telephone and email correspondence, Ms Dahm was unable to be contacted by my chambers both at the commencement time for the mention and for approximately 10 to 15 minutes thereafter.

- [13] In those circumstances, on the grounds of Ms Dahm's failure to comply with my direction, I determined to exercise my discretion pursuant to rule 45 of the *Industrial Relations (Tribunals) Rules 2011* (Qld) to dismiss the proceedings.¹
- [14] I note for completeness that, had Ms Dahm attended the mention, I would have taken the opportunity to put her on notice of my intention to consider exercising the discretion available to me pursuant to section 562A of the *Industrial Relations Act 2016* (Qld) to not deal with her appeal.
- [15] In my view, there is no 'decision' to review and therefore no jurisdiction for the Commission to deal with the matters that arise from the correspondence she received from Treasury as a Public Sector Appeal. In all likelihood, the matter would have been dismissed on those grounds, albeit, not until I had heard from Ms Dahm as to whether she had an arguable case.

Post-script

- [16] Following the mention on 13 November 2025, Ms Dahm made the following posts to her publicly viewable LinkedIn profile:



Figure 1: Ms Dahm posts a screenshot of two missed calls from the Commission on 13 November 2025 at 9:59 am for the mention due to start at 10:00 am. The calls were received 'now', demonstrating Ms Dahm determined not to answer the phone in real time.

¹ *Industrial Relations (Tribunals) Rules 2011* (Qld) r 45(2)(a),(3)(a).

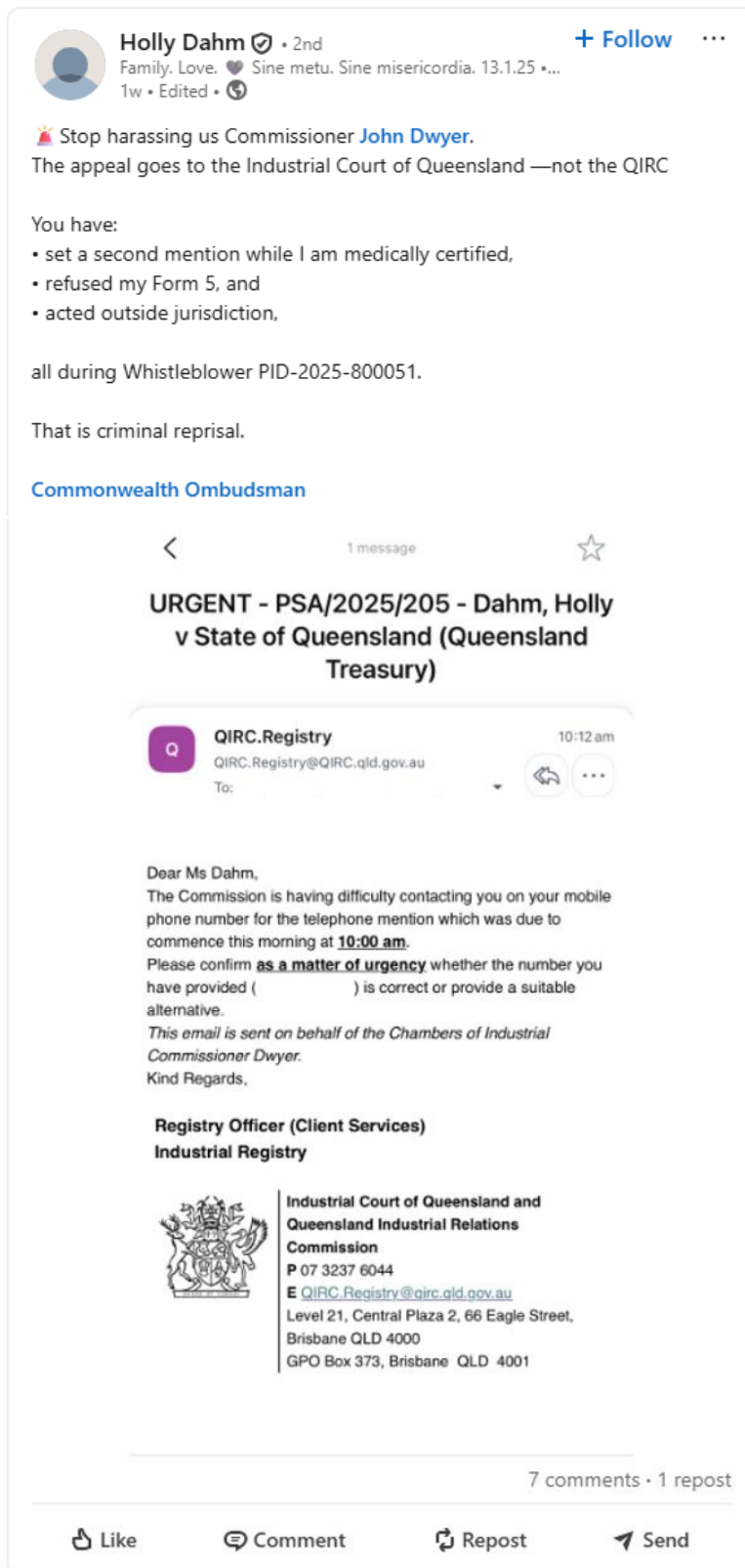


Figure 2: Ms Dahm posts a screenshot of the email correspondence she received from my chambers at 10:12 am on 13 November 2025. The email notes the Commission's difficulty in contacting Ms Dahm for the mention listed at 10:00 am that day.

- [17] It is evident by the posts Ms Dahm has made to LinkedIn that she considers she can unilaterally decide that the Commission has no jurisdiction to deal with her matter and thereafter refuse to comply with directions. The LinkedIn posts demonstrate that Ms Dahm deliberately evaded the various attempts made by the Commission to contact her for the mention on 13 November 2025.
- [18] This non-compliance with a direction of the Commission only serves to reinforce the basis for the exercise of the discretion to dismiss Ms Dahm's appeal in that it seems that it was entirely deliberate.

Order

- [19] In the circumstances I make the following Order:

Pursuant to r 45 of the *Industrial Relations (Tribunals) Rules 2011 (Qld)*, matter number PSA/2025/205 is dismissed



Queensland Treasury

CONFIDENTIAL

Holly Dahm

[REDACTED]
[REDACTED] QLD 4017

By email: hollyteganosborne@hotmail.com ; hollydahm@pm.me ;
hollydahm@proton.me

Dear Ms Dahm

SHOW CAUSE NOTICE - LIABILITY FOR DISCIPLINE FINDINGS

1. I am in receipt of information concerning your alleged conduct on the social media platform LinkedIn in relation to your employment with Queensland Treasury (**Treasury**).
2. Section 91 of the Public Sector Act 2022 (**PS Act**) provides that a chief executive may discipline an employee if they are reasonably satisfied a discipline ground has been established. I confirm I have been delegated the functions of the chief executive for this matter.
3. After giving full and careful consideration to the matters outlined below, I am of the view that you may be liable for disciplinary findings pursuant to s 91 of the PS Act (**Attachment 1**).
4. You are now required to show cause as to why a disciplinary finding should not be made against you in relation to the following allegation on the grounds as set out below:

ALLEGATION

Between 19 August 2025 and 15 September 2025, you have failed to comply with directions issued to you by Chris Charalambous, A/Chief Human Resource Officer, Treasury on 19 August 2025, and have posted various inappropriate comments on LinkedIn about Treasury employees and Treasury itself, which reflect adversely on Treasury.

The particulars of the Allegation are as follows:

1 William Street
GPO Box 611 Brisbane
Queensland 4001 Australia
Telephone +61 7 3035 1933
Website www.treasury.qld.gov.au

5. You are employed by Treasury as a Principal HR Advisor (AO7) in the People and Culture Branch. You commenced in this role on 8 July 2024.
6. At all times since 24 March 2025 you have been absent from work on a period of leave.
7. As an employee of Treasury, you are required to engage in responsible use of social media in your personal capacity and not engage in conduct which may reflect seriously and adversely on the public sector. Section 40(1)(k) of the PS Act (**Attachment 2**) requires you to ensure that your personal conduct does not reflect adversely on the reputation of the public sector entity in which you are employed (**Treasury**).
8. Section 1.5 of the Code of Conduct for the Queensland Public Service (**Attachment 3**), with which you are required to comply, requires you to ensure that your private conduct maintains the integrity of the public service and your ability to perform your duties.
9. You have a LinkedIn account in your own name. Treasury is listed as your employer on your LinkedIn profile, which is publicly accessible. Your LinkedIn profile has in excess of 5800 followers.
10. On 24 July 2025, Ms Jasmine Glaister, A/Director, People and Culture, Treasury, sent an email to you, which amongst other things, reminded you to be mindful of what you share on public platforms such as LinkedIn, and strongly encouraged you to consider removing any mention of Treasury as your employer from your LinkedIn profile to avoid any potential misunderstandings of your posts on LinkedIn representing the views of Treasury. A copy of Ms Glaister's email of 24 July 2025 is **Attachment 4**.
11. After you did not respond to Ms Glaister's email, she sent you another email on 29 July 2025. She stated in the email that she had been made aware that you had updated your LinkedIn profile to state 'Technical Lead for integrity, misconduct, and complex cases at QLD Treasury' and that you had been posting regarding your personal matters since the time of her last email to you on 24 July 2025. Ms Glaister requested that you remove any reference from your LinkedIn profile to Treasury being your employer, by close of business on 30 July 2025. A copy of Ms Glaister's email of 29 July 2025 is **Attachment 5**.
12. You did not comply with Ms Glaister's request. Also, on or about 29 July 2025, you 'posted' a portion of Ms Glaister's email to you of 24 July 2025, on your LinkedIn profile as follows:



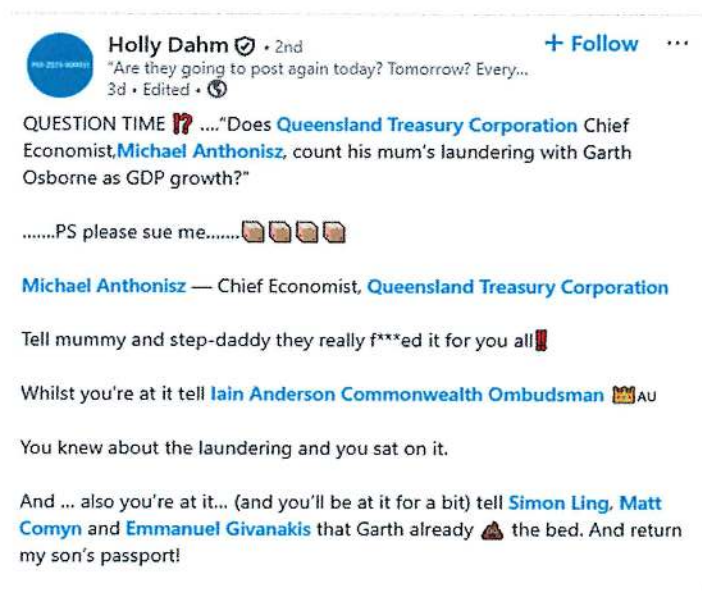
13. By letter to you dated 19 August 2025, Mr Charalambous noted Ms Glaister's correspondence to you dated 24 July 2025 and 29 July 2025 and your failure to comply with Ms Glaister's request to remove references to Treasury being your employer, from your LinkedIn profile. He stated that since the time of Ms Glaister's 29 July 2025 email, you had made numerous posts on your LinkedIn profile which made accusations about various government entities, and which he considered were likely to have an adverse effect on Treasury's reputation.
14. Mr Charalambous stated in his letter that by highlighting on your LinkedIn profile that you are an employee of Treasury, it is possible that any person who views your profile may consider the posts and comments you make to be the views of Treasury, not merely your personal views. Mr Charalambous said that he was very concerned about the derogatory and accusatory language of some of the comments you had made on your LinkedIn profile about Queensland Government entities, Commonwealth Government entities and senior office holders. He said that it was possible that some persons viewing those comments, and your LinkedIn profile generally, might consider that they represent the views of Treasury.
15. Mr Charalambous issued you with the following directions in his letter:
 - a. By 5.00pm on 21 August 2025:
 - i. Remove all posts on your LinkedIn profile page, or any other social media page which you control, which refer either directly or indirectly

to a State or Territory Government or Commonwealth Government related entity, or employees or office holders within those entities, in a manner which can reasonably be construed as derogatory, accusatory or otherwise inappropriate. The direction included that you remove any responses you received to those posts, and any duplicates of those posts created on your profile as a result of you reposting them or other people reposting them.

- ii. Remove all posts on your LinkedIn profile page or any other social media page which you control which might reasonably be considered to have an adverse effect on the reputation of Treasury or the Queensland Government, or any other government related entity, including their employees and office holders. The direction included that you remove any responses you received to those posts, and any duplicates of those posts created on your profile as a result of you reposting them or other people reposting them.
- iii. Remove any reference to your employer on your LinkedIn profile, and any other profile page of social media which you control, other than the listing of your employer in your work experience.
- iv. Not to make any further posts on either LinkedIn or any other social media platform which refer either directly or indirectly to a Queensland Government or other State and Commonwealth Government entity, including their employees and office holders, in a manner which can reasonably be construed as derogatory, accusatory or inappropriate.
- v. Not to make any further posts on either LinkedIn or any other social media platform which might reasonably be considered to have an adverse effect on the reputation of Treasury, or the Queensland Government or any other government related entity.
- vi. Not to post on LinkedIn or any other social media platform you control, any copies or descriptions of communications you have received or may in future receive from Treasury. The direction included Mr Charalambous' 'confidential letter' (of 19 August 2025), which he stated you must not post on social media (either in full or in

part) and which you must not refer to, in any way, on either LinkedIn or any other social media platform.

16. In his letter, Mr Charalambous stated that if you failed to comply with the above directions, you may be subject to a disciplinary process under the PS Act. A copy of Mr Charalambous' letter dated 19 August 2025, is **Attachment 6**.
17. You did not, by 5.00pm on 21 August 2025, nor at any time since, comply with the directions issued by Mr Charalambous as set out in paragraph 15(a). above, and you did not provide any explanation or excuse for your non-compliance. In particular:
- a. Your LinkedIn profile page still lists that you are a Principal Consultant with Treasury.
 - b. You have not removed from your LinkedIn profile page, posts pre-dating Mr Charalambous' directions to you of 19 August 2025, which refer to a State or Territory Government or Commonwealth Government related entity, or employees or office holders within those entities, in a manner which can reasonably be construed as derogatory, accusatory or otherwise inappropriate, such as the following post you made on or shortly before 19 August 2025 about Mr Michael Anthonisz, Chief Economist at Queensland Treasury Corporation:



- c. Your post about Mr Anthonisz is visible to your LinkedIn followers. It specifically refers to Mr Anthonisz being Queensland Treasury Corporation's Chief Economist and having knowledge of alleged 'laundering'. The post

states amongst other things 'Tell mummy and step-daddy they really f***ed it for you all'.

18. Since 19 August 2025, you have failed to comply with Mr Charalambous' directions to you set out in paragraphs 15(b), (c) and (d) above, and have not provided any explanation or excuse for your non-compliance. In particular:

a. On 21 August 2025, you posted on your LinkedIn profile page a copy of Mr Charalambous' letter dated 19 August 2025, in contravention of Mr Charalambous' direction to you in his letter (as set out in paragraph 15d. above) that you must not post a copy of the letter on LinkedIn or any other social media platform. A copy of your LinkedIn post is below.

19.08.25 12:47 Termination threat from Chris Charalambous A/Chief Human Resources Officer Corporate People & Culture Branch

A Commission would eat you for lunch. I don't need them to. I will.

1 of 4



Quasi-Independent Treasury:

CONFIDENTIAL

Hohe Dehm

Email: bahstegent@uvm.edu

Dear Mr. Oatley:

Your social media posts and LinkedIn profile

1. On 24 July 2025, your supervisor wrote to you raising concerns about posts that you had made on your LinkedIn profile. At that time your LinkedIn profile listed Qeios and Treasury as your employer. Your supervisor reminded you to be mindful of what you share on public platforms, and encouraged you to consider removing any mention of Qeios and Treasury as your employer from your LinkedIn profile, to avoid any potential misunderstandings.
2. On 29 July 2025, your supervisor wrote to you again in respect of your posts on your LinkedIn profile, and requested you to remove any reference to Qeios and Treasury as your employer from your LinkedIn profile by close of business on 30 July 2025. You did not comply with your supervisor's request.

Generalized Transitivity. Although μ is a binary relation over the workplace network, μ is a ternary relation: the ternary representation of μ is a triple μ with threefold transitivity, including a quadruple with fivefold transitivity. For each triple μ with threefold transitivity, μ is a triple with fourfold transitivity.

- [illegible]

It is best that you do not use a language you speak fluently and do not regularly use, as you will have no idea of your pronunciation or spelling. It is a waste of your precious time and a lot of money to go through the process of learning a language that you will not use.

11. The results also demonstrate the need for more effective and precise policy design to promote the positive effects of the use of the wage and cost-of-living index in public provision of social welfare and to reduce the negative effects on the provision of Social Assistance Transfers to the Poor and on the

b. Since 19 August 2025, after receiving Mr Charalambous' letter of that date, you have made the following posts on your LinkedIn profile, which refer to Treasury employees and their roles, and Treasury itself, and which make comments about the employees and Treasury which could reasonably be construed as derogatory, accusatory or otherwise inappropriate, in contravention of Mr Charalambous' directions to you in his letter (set out in paragraphs 15(b) and (c) above):

i. On 19 August 2025:



Holly Dahm • 2nd

+ Follow ...

"Are they going to post again today? Tomorrow? Every...
3d • Edited •

Queensland Treasury Exhibit A: 📄

What are you doing?

Chris Charalambous — A/CHRO

Why are you doing it? Who told you this was a good idea?

Call your 5, 6, 7 (oh wait, that's me 😊), 8. I don't know.

Call A/Director PID Coordinator 📞 - prob said no given her last experience.

3rd time's NOT the charm

Call your lawyer. Call anyone. Good lord, call someone who knows what they're doing. Call General Counsel (she's brilliant).

✗ Don't call **Hall & Wilcox** — not very good.

ii. On 21 August 2025:



Holly Dahm • 2nd

+ Follow

"Are they going to post again today? Tomorrow? Every day? Is t...
11h • Edited •

Chris Charalambous Your letter = 🗑️ Trash NOT Treasury.

🗑️ BIN IT. BIN CHRIS. BIN JASMINE. BIN CCC.

NO Exec endorsed it. 0% chance General Counsel touched. NO way Crown Law supported it.

NOT Treasury. NOT excellence.

🔥 02.06.25 Vested - Google it 🍌 Every act after = a crime.

Jasmine Glaister - FULLY informed. 23.12.24 Knowledge Fixed. No deniability.

Chris Charalambous, **Jasmine Glaister** & the **Crime and Corruption Commission (Queensland)** = Corruption. Suppression. Retaliation. Collusion. Finished.

Iain Anderson Commonwealth Ombudsman (Google him - he outranks you)

iii. On 21 August 2025:



Holly Dahm • 2nd

+ Follow ...

"Are they going to post again today? Tomorrow? Every day? Is t...
24m • Edited •

Chris Charalambous A/CHRO (Responsible Officer) & Jasmine Glaister (SO, A/PID Coordinator).

19 Aug you emailed threats.

21 Aug you couriered the same threats. Thanks for returning your own chain of custody.

Treasury PID inbox:

- 17 Jul = bounce (550 5.4.1 Access Denied)
- 21 Aug = bounce (550 5.4.1 Access Denied)

Jasmine Glaister — why the encrypted "Do Not Forward" email and the "Support" text at the same time? Retaliation = crime.

PS: encrypted, can't forward... remember?

So, Chris & Jasmine — what's up? Is it us, or just me?

? Why does statutory evidence die every time it hits PID@treasury.qld.gov.au?

? Why send encrypted emails?

? Why courier hard copies of threats already emailed?

? Why do Responsible Officers & PID Coordinators turn the "PUBLIC" in PID into ?

(And no, don't blame IT or "System Error.")

BIN IT. BIN CHRIS. BIN JASMINE. BIN CCC.

iv. On 27 August 2025:



Holly Dahm • 2nd

+ Follow ...

Cowardice ~ Uninsurable Event(s) PID-2025-800051 ...
13h • Edited •

Excuse me — [Queensland Treasury](#) did you publish a contrived PID policy replacing the one I personally reviewed with Catherine Shrubsole, PID Coordinator, Director People & Culture?

Like

Comment

Repost

Send

v. On 1 September 2025:



Holly Dahm • 2nd

+ Follow ...

\$1.3B Westpac 'settlement' FedCourt-stamped. Regulators smea...
21h • Edited •

Commonwealth Ombudsman. When **Carol Kahler**, General Counsel, **Queensland Treasury**, is aware and stays silent — that silence is criminal liability. **Carol Kahler** — the emails are open.

I hate this and I am sorry. But silence from General Counsel is criminal.

Queensland Treasury - LARO, do the right thing. So many of you are incredible people.

vi. On 1 September 2025:



Holly Dahm • 2nd

+ Follow ...

\$1.3B Westpac 'settlement' FedCourt-stamped. Regula...
21h • Edited •

 Criminal **Queensland Treasury**, **Queensland Government**, **Australian Government** AUAE

Iain Anderson ~ **Commonwealth Ombudsman**
Australian Parliament

Paul Williams, UT, **Drew Ellem**, DUT **Queensland Treasury** — Have you taken any legal action?

Terminated A/CHRO Chris Charalambous' contract, returning him to **Crown Law Queensland**?

Or are you protecting him, **Simon McKee**, and countless others?

Australian Federal Police — We will not wait.

All criminal from 3 June 2025.

vii. On 2 September 2025:



Holly Dahm • 2nd

\$1.3B Westpac 'settlement' FedCourt-stamped. Regulators smea...
8h • Edited •

+ Follow ...

Drew Ellem, Deputy Under Treasurer, **Queensland Treasury**

People & Culture & LARO are on record.

My reporting line

Nyrée Illingsworth — Fully aware - 30 Jan 2025. SES, authorised officer, responsible officer for PID management, assessment and referral. Retired ~ irrelevant. ✗ No question - you're a coward & disgrace.

Catherine Shrubsole — Fully aware - Jan 2025 substantive Director, PID Coordinator. Actively obstructed return to work. On leave. Status does not matter. You knew. You carried the function. You failed to disclose. ✗ No question - you're a disgrace.

Jasmine Glaister — Fully aware - 13 Jan 2025 substantive A08 - my manager. Now Acting PID Coordinator and Acting Director P&C. 24 July written threat, 29 July encrypted threat. Responsible for health, wellbeing, safety. Each action is criminal retaliation.

✗ No question - you are not to be trusted & you're a disgrace.

Chhaya Meta — Fully aware Jan 2025, temporary manager. Actively obstructed return to work. Silence and conduct are retaliation under statute. ? You are a disgrace, disclosed that constructive knowledge yet?

Sam Leblang — Acting CHRO Statute fixes you as irresponsible officer whilst Chris holidayed in Europe. Personal liability compounded from 3 June. ✗ No questions. You are a disgrace.

Chris Charalambous — Acting CHRO. Statute fixes you as irresponsible officer. Personal liability compounded from 3 June. ✗ No questions. My guess, you're the ponzy.

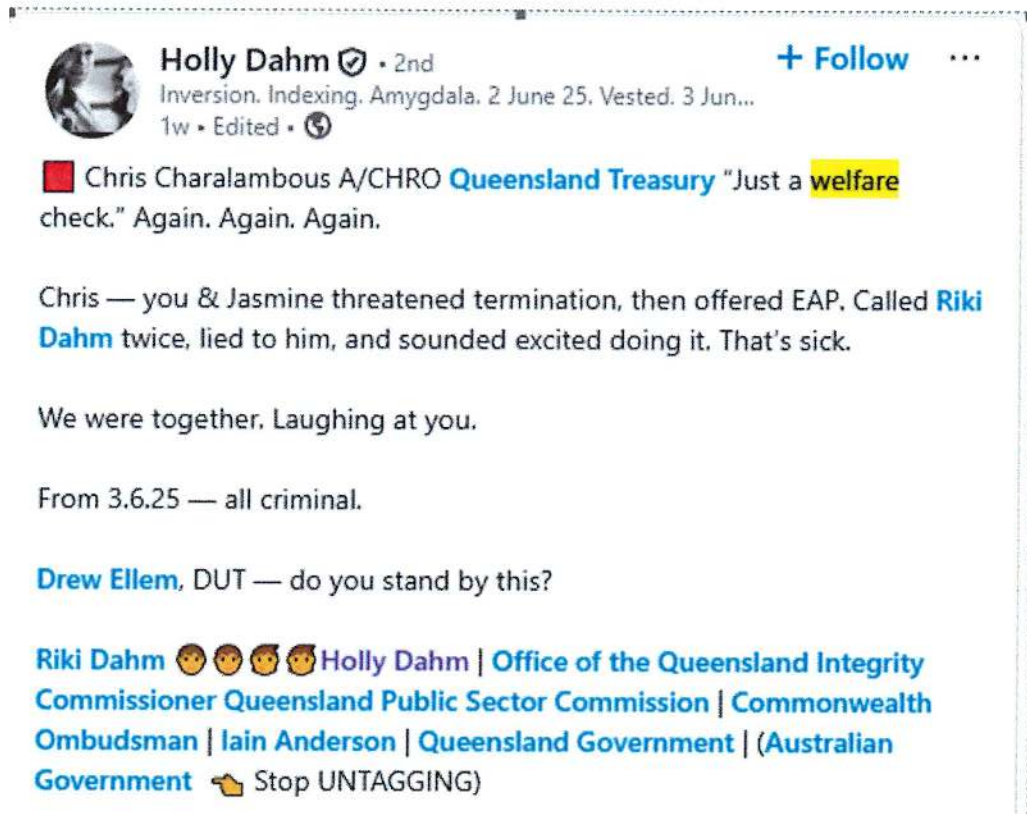
✓ **Crown Law Queensland** - excellence. No way they take you back Chris.

Jo Keen — former Head of Corporate. Entire People & Culture function reported to you until abolition. Delegated authority carried. Omission is criminal liability. ? You jumped, my view - you knew. Did you disclose?

Paul Williams — Under Treasurer. Accountable authority under PGPA Act. Criminal breach of duty is fixed. ? Did you sign?

Carol Kahler — General Counsel. Concealment of crime is not protected.

- viii. Also on 2 September, in relation to a welfare check phone call made by Mr Charalambous on 26 August, and posted with a recording of that call:



19. Your posts on your LinkedIn profile set out in paragraph 18 above, are visible to your followers.
20. You have not provided any explanation to Treasury for your failure to comply with Mr Charalambous' directions issued to you in his letter of 19 August 2025.
21. Your LinkedIn posts set out in paragraph 18 above contain disparaging and offensive comments and accusations about Treasury employees and Treasury itself. Your posts, which are publicly visible, have the potential to significantly adversely affect the reputation of Treasury.
22. Treasury employees are held to high standards of ethical conduct, including being required under the Public Sector Act 2022 to ensure that their personal conduct does not reflect adversely on Treasury's reputation. Your behaviour is a significant and serious departure from the standard of conduct expected of you as a Treasury employee.

23. Having considered the material before me in relation to the Allegation, I consider that you may be liable to disciplinary findings on the following basis:

- a. Pursuant to section 91(1)(b) of the PS Act, in that you have been guilty of misconduct, that is inappropriate or improper conduct in a private capacity that reflects serious and adversely on the public sector entity in which you are employed within the meaning of s 91(5)(b) of the PS Act.

Alternatively,

- b. Pursuant to section 91(1)(d) of the PS Act, in that you have contravened, without reasonable excuse, a direction given to the employee as a public sector employee by a responsible person within the meaning of section 91(5).

ENCLOSURES

24. I have enclosed a copy of the following documents in relation to this matter:

- Section 91 of the *Public Sector Act 2022* (Attachment 1)
- Section 40(1) of the *Public Sector Act 2022* (Attachment 2)
- Code of Conduct for the Queensland Public Service (Attachment 3)
- Email dated 24 July 2025 from Jasmine Glaister (Attachment 4)
- Email dated 29 July 2025 from Jasmine Glaister (Attachment 5)
- Letter dated 19 August 2025 from Chris Charalambous (Attachment 6)
- Directive 05/23 (Attachment 7)

RESPONSE TO NOTICE TO SHOW CAUSE

25. You are now afforded an opportunity to show cause why a disciplinary finding should not be made against you in relation to the grounds set out in this letter. You may respond in writing within 14 days from the date of this letter.
26. In accordance with the principles of natural justice, no finding or determination has been made nor will be made in relation to the Allegation until you have had the opportunity to formally respond. Your response should provide any explanation of the matters above that you consider relevant.
27. You are required to provide your response marked 'Private and Confidential' to me. If you respond by email, please address your response to corporate-mailbox@treasury.qld.gov.au and ensure that any documents you intend to rely on are attached.

28. I will consider any written response from you, along with any material you provide with that response, prior to making a decision. If you do not respond within 14 days, I will make a decision based on the material currently before me.
29. If you have any procedural questions about this letter, please email corporate-mailbox@treasury.qld.gov.au. Please contact us at this email address only.

DIRECTIONS IN 19 AUGUST LETTER

30. Please be aware that the directions given to you in Mr Charalambous' 19 August 2025 letter remain in place.

CONFIDENTIALITY

31. The matters which are the subject of this correspondence and disciplinary process are to remain confidential. This will ensure the integrity of this process.
32. You are directed:
- a. to keep the details of this matter confidential;
 - b. not to post anything on social media about this matter, including this letter or any part or fragment of this letter, or any other correspondence sent to you about this matter;
 - c. not to discuss or correspond about this matter with your work colleagues or any person likely to have information relevant to the Allegation against you, apart from your union, representative or support person; and
33. In the event you consider it necessary to contact a particular colleague or Treasury staff member in relation to this matter you are directed to send your request to corporate-mailbox@treasury.qld.gov.au in the first instance, who will refer your request to me for consideration.
34. You are further reminded that the provisions of the Code of Conduct continue to apply throughout the disciplinary process.

HUMAN RIGHTS

35. I have considered the relevant sections of the Human Rights Act 2019 when determining whether to commence this disciplinary process.
36. I acknowledge my decision to commence a disciplinary process may impact on your human rights, including the right to take part in public life (through employment in

the public service), the right to privacy and the right to reputation, which extends to protect professional relationships and reputation. If disciplinary findings are made against you, this may limit these rights as it may form part of your formal disciplinary history and may need to be disclosed in certain circumstances, and this may have a negative impact on your prospects of obtaining employment elsewhere in the public service.

37. However, in my view any limitation is demonstrably justified. This is because the public interest in ensuring that employees conduct themselves in a manner which is consistent with the obligations and standards of conduct imposed upon them outweighs the limited potential impact on your human rights at this time. Additionally, you will be afforded procedural fairness to respond to the Allegation.

EMPLOYEE ASSISTANCE SERVICE

38. I remind you that the Employee Assistance Service, provided through TELUS Health, is available to Treasury employees free of charge. TELUS Health provides a free and confidential counselling and support service that is available 24 hours a day, 7 days a week on 1800 604 640.

Yours sincerely



Drew Ellem
Deputy Under Treasurer
Corporate and Executive Services
Queensland Treasury

16 / 9 / 2025

Attachment 1

Public Sector Act 2022

91 Grounds for discipline

(1) A public sector employee's chief executive may discipline the employee if the chief executive is reasonably satisfied the employee has—

- (a) engaged in repeated unsatisfactory performance or serious under performance of the employee's duties, including, for example, by performing duties carelessly, incompetently or inefficiently; or
- (b) been guilty of misconduct; or
- (c) been absent from duty without approved leave and without reasonable excuse; or
- (d) contravened, without reasonable excuse, a direction given to the employee as a public sector employee by a responsible person; or
- (e) used, without reasonable excuse, a substance to an extent that has adversely affected the competent performance of the employee's duties; or
- (f) contravened, without reasonable excuse, a requirement of the chief executive under section 71 in relation to the employee's employment or secondment by, in response to the requirement—
 - (i) failing to disclose a serious disciplinary action; or
 - (ii) giving false or misleading information; or
- (g) contravened, without reasonable excuse, a provision of—
 - (i) this Act, other than section 39 or 40; or
 - (ii) another Act that applies to the employee in relation to the employee's employment; or
- (h) contravened, without reasonable excuse, a relevant standard of conduct in a way that is sufficiently serious to warrant disciplinary action.

(2) A disciplinary ground arises when the act or omission constituting the ground is done or made.

(3) Also, a chief executive may discipline, on the same grounds mentioned in subsection (1), a public sector employee under section 94 or a person under section 95.

(4) To remove any doubt, it is declared that a disciplinary ground does not arise in relation to a public sector employee only because the employee's work performance or personal conduct fails to satisfy the work performance and personal conduct principles or the public sector principles.

(5) In this section—

misconduct means—

- (a) inappropriate or improper conduct in an official capacity; or
- (b) inappropriate or improper conduct in a private capacity that reflects seriously and adversely on the public sector entity in which the employee is employed.

Example of misconduct—

victimising another public sector employee in the course of the other employee's employment in the public sector

relevant standard of conduct —

- (a) for a public sector employee, means—
 - (i) a standard of conduct applying to the employee under an approved code of conduct under the Public Sector Ethics Act 1994; or
 - (ii) a standard of conduct, if any, applying to the employee under an approved standard of practice under the Public Sector Ethics Act 1994; and
- (b) for a public sector employee who is an ambulance officer under the Ambulance Service Act 1991, section 13(1)—includes a code of practice under section 41 of that Act; and
- (c) for a public sector employee who is a fire service officer under the Fire Services Act 1990—includes a code of practice under section 7B of that Act.

responsible person, for a direction, means a person with authority to give the direction, whether the authority derives from this Act or another law.

Work performance and personal conduct principles

(1) In recognition that public sector employment involves a public trust, the work performance and personal conduct of each public sector employee should be guided by the following principles (the work performance and personal conduct principles)—

- (a) achieving excellence in service delivery;
- (b) ensuring the effective, efficient and appropriate use of public resources;
- (c) giving effect to government policies and priorities;
- (d) collaborating with other public sector entities with a focus on public sector-wide priorities in addition to priorities specific to particular public sector entities, if appropriate and while recognising the need for independence of particular public sector entities;
- (e) providing sound and impartial advice to government;
- (f) continuously improving work performance, including through training and development;
- (g) carrying out duties impartially and with integrity;
- (h) acting honestly, fairly and in the public interest;
- (i) interacting with staff members under the Ministerial and Other Office Holder Staff Act 2010 respectfully, collaboratively and with integrity;
- (j) observing all laws relevant to the employment;
- (k) ensuring the employee's personal conduct does not reflect adversely on the reputation of the public sector entity in which the employee is employed;
- (l) observing the ethics principles under the Public Sector Ethics Act 1994, section 4;
- (m) complying with an approved code of conduct and any approved standard of practice as required under the Public Sector Ethics Act 1994, section 12H or 18.

Code of Conduct

For the Queensland Public Service

1 January 2011



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Application

This Code applies to employees of Queensland public service agencies.

Public service agencies are defined under the *Public Sector Ethics Act 1994* as:

- a department
- a TAFE institute or statutory TAFE institute
- the administrative office of a court or tribunal, and
- an entity prescribed by regulation.

For the purposes of this document only, employees (other than judicial officials), are defined as:

- any Queensland public service agency employee whether permanent, temporary, full-time, part-time or casual, and
- any volunteer, student, contractor, consultant or anyone who works in any other capacity for a Queensland public service agency.

The Code applies at all times when we are performing official duties including when we are representing the Queensland Government at conferences, training events, on business trips and attending work-related social events.

How this Code works

The Code contains the ethics principles and their associated set of values prescribed in the *Public Sector Ethics Act 1994*. It also contains standards of conduct for each ethics principle. The ethics principles are:

- 1** Integrity and impartiality
- 2** Promoting the public good
- 3** Commitment to the system of government
- 4** Accountability and transparency

These are the fundamental principles of ethical behaviour essential to robust public sector integrity and accountability and which public sector entities¹ must promote in their internal and external relationships.

Each principle is strengthened by the set of values describing the behaviour that will demonstrate that principle. The principles and associated values are equally important.

The standards of conduct, contained in the Code under each set of principles and values, help us as individuals to understand how we put these principles and values into practice. The standards are not intended to cover every possible scenario, therefore in adhering to the Code, we are committed to upholding the intention and spirit of the principles and values.

Agency-specific Standards of Practice, as approved by the Public Service Commission Chief Executive can supplement this Code. An approved Standard of Practice will apply to that agency’s employees in the same way as this Code.

As well as upholding the principles, values and complying with standards of conduct set out in this Code, we will also comply with all relevant legislation, awards, certified agreements, subsidiary agreements, directives, whole-of-government policies and standards. We will also adhere to the policies, organisational values and organisational documents of our employing agency.

Principles
• Contained in Section 4 of the Public Sector Ethics Act 1994. • Basis of good administration.
Values
• Contained in Part 3, Division 2 of the Public Sector Ethics Act 1994. • Provides a detailed explanation of the principles.
Standards of Conduct
• Statements that reflect and support the values and principles.

¹ The *Public Sector Ethics Act 1994* applies to public sector entities, including public service departments, agencies and offices, local government organisations and other public sector organisations such as universities.

Using this Code

The Code describes how we will conduct ourselves in delivering services to the Queensland community. An ethical culture in public service agencies starts with our Chief Executive Officers and is demonstrated through our senior leaders and all employees.

All employees

We take personal responsibility to uphold this Code and demonstrate the principles and values of the *Public Sector Ethics Act 1994* by the way we perform our duties.

This Code recognises that we can all demonstrate ethical leadership in how we perform our role, and is a statement of our commitment to the people of Queensland, their elected representatives and our colleagues.

Chief Executive and Senior Executive Service Officers

As our senior leaders, Chief Executive and Senior Executive Service (SES) Officers have a responsibility to visibly demonstrate and uphold the principles and values of the *Public Sector Ethics Act 1994*. Chief Executive and SES officers' roles are to promote an organisational culture that values high ethical standards and behaviour.

Chief Executive and SES officers openly demonstrate their conscious commitment to ethics by communicating the importance of ethical decision-making in the workplace, and promoting ethical behaviour in day-to-day actions.

Chief Executive and SES officers also ensure employees have access to training in the operation of this Code and in ethical decision-making more broadly, making the Code meaningful for all employees.

Managers and supervisors

Managerial behaviour sets the tone for the conduct of all employees. Managers and supervisors have a responsibility to model and promote this Code.

Managers have the ability to influence others by fostering an ethical environment and demonstrate this awareness in performing their duties and in making decisions.

Managers ensure public service employees understand the Code, and any other relevant legislation, delegations, policies or other information required to satisfactorily perform our duties. Managers also ensure that appropriate development and training is provided allow us to perform our duties.

Upholding this Code

As part of demonstrating our commitment to uphold this Code, we need to identify and report conduct that is not consistent with this Code.

Managers have a responsibility to make fair, transparent and consistent decisions regarding any allegations of behaviour that does not uphold this Code.

We will support employees who report genuine concerns of wrongdoing and manage any reports of suspected wrongdoing in a fair, transparent and consistent manner.

Principle and values

1 Integrity and impartiality

The *Public Sector Ethics Act 1994* states:

In recognition that public office involves a public trust, public service agencies, public sector entities and public officials seek to promote public confidence in the integrity of the public sector and -

- a. are committed to the highest ethical standards;
- b. accept and value their duty to provide advice which is objective, independent, apolitical and impartial;
- c. show respect towards all persons, including employees, clients and the general public;
- d. acknowledge the primacy of the public interest and undertake that any conflict of interest issue will be resolved or appropriately managed in favour of the public interest; and
- e. are committed to honest, fair and respectful engagement with the community.

Standards of conduct

1.1 Commit to the highest ethical standards

As public service employees we are required to ensure that our conduct meets the highest ethical standards when we are fulfilling our responsibilities.

We will:

- a. ensure any advice that we provide is objective, independent, apolitical and impartial
- b. ensure our decision making is ethical
- c. engage with the community in a manner that is consultative, respectful and fair, and
- d. meet our obligations to report suspected wrongdoing, including conduct not consistent with this Code.

1.2 Manage conflicts of interest

A conflict of interest involves a conflict between our duty, as public service employees, to serve the public interest and our personal interests. The conflict may arise from a range of factors including our personal relationships, our employment outside the public service, our membership of special interest groups, or our ownership of shares, companies, or property.

As public service employees we may also experience conflicts of interest between our public service ethics and our professional codes of ethics (for example as health care professionals or as lawyers), or with our personal beliefs or opinions.

Having a conflict of interest is not unusual and it is not wrongdoing in itself. However failing to disclose and manage the conflict appropriately is likely to be wrongdoing.

As public service employees we are committed to demonstrating our impartiality and integrity in fulfilling our responsibilities and as such we will:

- a. always disclose a personal interest that could, now or in the future, be seen as influencing the performance of our duties. This will be done in accordance with our agency policies and procedures
- b. actively participate with our agency in developing and implementing resolution strategies for any conflict of interest, and
- c. ensure that any conflict of interest is resolved in the public interest.

1.3 Contribute to public discussion in an appropriate manner

Commenting on government policy is a matter for Ministers, not employees. Unless prior authorisation has been given, we will not comment to the media on government policy.

Where providing factual information to the public on government policy is a part of our official duties and responsibilities, we will ensure that information is appropriately authorised, and that we properly represent government policy and administration in its intended manner and spirit.

Like any other citizen, we have the right to contribute to public discussions on community and social issues in our private capacity.

In doing so, we will:

- a. take reasonable steps to ensure that any comment we make will be understood as representing our personal views, not those of government
- b. maintain the confidentiality of information we have access to due to our roles, that is not publicly available, and
- c. be aware that personal comments about a public issue may compromise our capacity to perform the duties of our role in an independent, unbiased manner.

1.4 Manage participation in external organisations

Our work as a public service employee does not remove our right to be active privately in a political party, professional organisation or trade union.

As a member of a political party, however, we are aware that participating in activities in the public arena, where we may be identified as a public service employee, can give rise to a perception of conflict of interest (see section 1.2). Where this situation arises, we will declare and manage our activities in accordance with our agency's policies.

If we are elected as workplace representatives or officials of a trade union or professional association, we are not required to seek permission from our workplace before speaking publicly in that capacity, and we will make it clear that our comments are made only on behalf of that organisation.

In all instances, we will comply with the appropriate laws of privacy, confidentiality and information management.

1.5 Demonstrate a high standard of workplace behaviour and personal conduct

We have a responsibility to always conduct and present ourselves in a professional manner, and demonstrate respect for all persons, whether fellow employees, clients or members of the public.

We will:

- a. treat co-workers, clients and members of the public with courtesy and respect, be appropriate in our relationships with them, and recognise that others have the right to hold views which may differ from our own
- b. ensure our conduct reflects our commitment to a workplace that is inclusive and free from harassment
- c. ensure our fitness for duty, and the safety, health and welfare of ourselves and others in the workplace, whether co-workers or clients
- d. ensure our private conduct maintains the integrity of the public service and our ability to perform our duties, and
- e. comply with legislative and/or policy obligations to report employee criminal charges and convictions.

Principle and values

2 Promoting the public good

The *Public Sector Ethics Act 1994* states:

In recognition that the public sector is the mechanism through which the elected representatives deliver programs and services for the benefit of the people of Queensland, public service agencies, public sector entities and public officials -

- a. accept and value their duty to be responsive to both the requirements of government and to the public interest;
- b. accept and value their duty to engage the community in developing and effecting official public sector priorities, policies and decisions;
- c. accept and value their duty to manage public resources effectively, efficiently and economically;
- d. value and seek to achieve excellence in service delivery; and
- e. value and seek to achieve enhanced integration of services to better service clients.

Standards of conduct

2.1 Commit to excellence in service delivery

Public service agencies are entrusted with public funds to develop and deliver services to the community on behalf of government.

We have a responsibility to:

- a. deliver services fairly, courteously, effectively, and ensure we use resources efficiently and economically
- b. assist all members of the community, particularly people with disabilities, those who speak languages other than English, and those who may find it difficult to access government services, and
- c. treat complaints from clients and the community seriously and respond to constructive feedback as an opportunity for improvement.

2.2 Ensure appropriate community engagement

Community participation is crucial to the development of quality government planning and decision-making processes.

We have a responsibility, where appropriate and in accordance with our official duties, to:

- a. listen and respond to issues and concerns raised by individuals or communities
- b. consult with the public to assist in the development of public policy, and
- c. assist in raising community awareness about public issues and policies.

2.3 Work as an integrated service

In order to deliver excellence in customer service, we will work together to address complex issues and provide integrated services to the community.

We have a responsibility, where appropriate and in accordance with our official duties, to:

- a. share information across Queensland public service agencies, where permitted by law, to enhance the seamless delivery of services
- b. share common-use assets, accommodation, and infrastructure within Queensland public service agencies to generate economies and efficiencies
- c. collectively plan and deliver related programs and services within Queensland public service agencies, and
- d. work cohesively at the local, regional, state and national levels to provide integrated services.

Principle and values

3 Commitment to the system of government

The *Public Sector Ethics Act 1994* states:

In recognition that the public sector has a duty to uphold the system of government and the laws of the State, Commonwealth and local government, public service agencies, public sector entities and public officials -

- a. accept and value their duty to uphold the system of government and the laws of the State, the Commonwealth and local government;
- b. are committed to effecting official public sector priorities, policies and decisions professionally and impartially; and
- c. accept and value their duty to operate within the framework of Ministerial responsibility to government, the Parliament and the community.

(This) does not limit the responsibility of a public service agency, public sector entity or public sector official to act independently of government if the independence of the agency, entity or official is required by legislation or government policy, or is a customary feature of the work of the agency, entity or official.

Standards of conduct

3.1 Commit to our roles in public service

Our role is to undertake our duties, and to give effect to the policies of the elected government, regardless of its political complexion.

We will:

- a. accept that the elected government has the right to determine policy and priorities
- b. be responsive to the government of the day and implement decisions and policies professionally and impartially
- c. comply with the laws of State, Australian and local governments
- d. comply with all relevant awards, certified agreements, subsidiary agreements, directives, whole-of-government policies and standards, and
- e. adhere to the policies, organisational values and organisational documents of our employing agency.

3.2 Maintain appropriate relationships with Ministerial staff

Ministerial advisors and the public service share a common commitment to serving the government of the day. Central to good government, and the ability to carry out the designated role of the public service, are positive and productive interactions between the administrative and political arms of government.

If providing advice to Ministers is a part of our role, we will ensure our interactions are positive and productive when engaging with ministerial staff.

Ministerial staff are not empowered to direct public service employees in their own right. If this occurs, we will bring this to the attention of our agency's senior management.

3.3 Ensure proper communication with Members of Parliament

We have the right to communicate directly with a Member of Parliament on any issue affecting us as a private citizen. In communicating with Members as private citizens, we will maintain the confidentiality of information that is not publicly available, and we have access to due to our roles.

Principle and values

4 Accountability and transparency

The *Public Sector Ethics Act 1994* states:

In recognition that public trust in public office requires high standards of public administration, public service agencies, public sector entities and public officials -

- a. are committed to exercising proper diligence, care and attention;
- b. are committed to using public resources in an effective and accountable way;
- c. are committed to managing information as openly as practicable within the legal framework;
- d. value and seek to achieve high standards of public administration;
- e. value and seek to innovate and continuously improve performance; and
- f. value and seek to operate within a framework of mutual obligation and shared responsibility between public service agencies, public sector entities and public officials.

Standards of conduct

4.1 Ensure diligence in public administration

We have an obligation to seek to achieve high standards of public administration and perform our duties to the best of our abilities.

We will:

- a. apply due care in our work, and provide accurate and impartial advice to all clients whether members of the public, public service agencies, or any level of government
- b. treat all people equitably and consistently, and demonstrate the principles of procedural fairness and natural justice when making decisions
- c. exercise our lawful powers and authority with care and for the purpose for which these were granted, and
- d. comply with all reasonable and lawful instructions, whether or not we personally agree with a given policy direction.

4.2 Ensure transparency in our business dealings

In order to ensure all government dealings with private industry are conducted with the highest level of integrity we will ensure:

- a. our business meetings with persons who were formerly Ministers, Parliamentary Secretaries or senior government representatives are not on matters those persons had official dealings with in their recent previous employment in accordance with government policy
- b. any engagement we have with lobbyists is properly recorded, and
- c. we manage gifts, benefits or hospitality in accordance with our agency policies.

4.3 Ensure appropriate use of official resources, public property and facilities

We are accountable for all resources that we use in the course of our duties.

We will:

- a. be economical, and avoid waste and extravagance in the use of public resources for proper purposes
- b. use any public resource in accordance with official policies
- c. purchase, manage and care for public resources in accordance with official policies, and
- d. responsibly utilise human assets such as corporate knowledge and intellectual property, as public resources.

4.4 Ensure appropriate use and disclosure of official information

The public has a right to know the information that is created and used by the government on their behalf. This right is balanced by necessary protections for certain information, including personal information.

Information privacy legislation protects against the misuse of personal information and we have an obligation to ensure the lawful collection and handling of personal information.

In addition, we will :

- a. treat official information with care and use it only for the purpose for which it was collected or authorised
- b. store official information securely, and limit access to those persons requiring it for legitimate purposes, and
- c. not use confidential or privileged information to further personal interests.

We will continue to respect the confidentiality of official information when we leave public service employment.

4.5 Commit to innovation and continuous performance improvement

The capacity of the public service to deliver services to the community depends on an innovative and creative workforce, and a commitment to continuously improve the performance of our agency and ourselves.

We each have a responsibility, having regard to our own roles, to:

- a. maintain and develop our professional skills and knowledge
- b. in consultation with our managers, take reasonable steps to identify and apply for development opportunities relevant to our current roles and responsibilities
- c. actively participate in employee performance management processes, including induction, performance planning and development, and
- d. actively contribute to developing and improving business planning and processes, including innovative ways of delivering services.

For more information

If you need assistance about how this Code relates to you, please contact your agency's Ethical Standards or Human Resources area.

For further advice about the operation of this Code, you may wish to contact the Public Service Commission (PSC) Advisory Service on 1300 038 472.

Copies of this Code of Conduct for the Queensland Public Service, plus additional supporting information can be accessed at www.ethics.qld.gov.au.

www.ethics.qld.gov.au



From: Jasmine Glaister
Sent: Thursday, 24 July 2025 4:26 PM
To: Holly Osborne <hollyteganosborne@hotmail.com>
Subject:

Hi Holly,

I am reaching out to check in with you.

It has come to my attention that there have been some recent posts on your LinkedIn page regarding personal matters. I understand that you've been navigating some challenging personal circumstances, and I want to acknowledge how difficult this can be.

At the same time, I'd like to remind you to be mindful of what you share on public platforms. Your LinkedIn profile lists Queensland Treasury as your employer and posts on public forums can sometimes be misinterpreted as representing the views of the organisation, even if that is not the intention.

As outlined in the [Code of Conduct](#) (Section 1.3), it's important to ensure that any comments you make are clearly understood as your personal views, not those of the government. Additionally, Section 1.5 highlights the need for our private conduct to uphold the integrity of the public service.

I am aware there is reference on your page post to the 'executive of government' and a statement about resolving conflicts in the public's favour. I would strongly encourage you to consider removing any mention of Queensland Treasury as your employer from your LinkedIn profile, to avoid any potential misunderstandings.

More importantly, I want to express my concern for your wellbeing. I know that you have been through a lot this past year, and I want to make sure you're supported. Please remember that the Treasury Employee Assistance Program (EAP) is available to you and your immediate family. TELUS Health offers free, confidential counselling and wellbeing

services 24/7, provided by qualified professionals. You can reach them anytime at 1800 604 640.

If you'd like to have a chat, please don't hesitate to give me a call.

Take care of yourself and talk soon,

Jasmine

Jasmine Glaister

A/Director, People and Culture

People and Culture

P 07 3522 7779

jasmine.glaister@treasury.qld.gov.au

1 William Street

Queensland Treasury



Queensland Treasury acknowledges Aboriginal peoples and Torres Strait Islander peoples as the Traditional Owners and custodians of the land. We recognise their connection to land, sea, and community, and pay our respects to Elders past, present and emerging.



Follow Queensland Treasury for updates.

From: Jasmine Glaister
Sent: Tuesday, 29 July 2025 11:54 AM
To: Holly Osborne <hollyteganosborne@hotmail.com>
Subject: Removal of reference to Treasury from LinkedIn page
Importance: High

Hi Holly,

I am following up on my previous correspondence (attached) regarding your LinkedIn profile.

How are you going?

While I have not received a response from you, I have been made aware that you have updated your LinkedIn profile to state: 'Technical Lead for integrity, misconduct, and complex cases at QLD Treasury' and have been posting regarding your personal matters since my last email to you.

I am now requesting that you remove any reference to Queensland Treasury as your employer from your LinkedIn page by close of business tomorrow, **30 July 2025**.

This request is in line with the expectations outlined in the Code of Conduct, particularly Section 1.3, which emphasises the importance of ensuring that personal views are not misinterpreted as those of the organisation, and Section 1.5, which highlights the need to uphold the integrity of the public service in our private conduct.

I remind you that the Treasury Employee Assistance Program (EAP) is available to you and your immediate family. TELUS Health offers free, confidential counselling and wellbeing services 24/7, provided by qualified professionals. You can reach them anytime at 1800 604 640.

Can you please confirm receipt of my email?

If you have any questions or would like to discuss, please reach out.

Thank you,
Jasmine

Jasmine Glaister
A/Director, People and Culture
People and Culture
P 07 3522 7779
jasmine.glaister@treasury.qld.gov.au
1 William Street
Queensland Treasury





Follow Queensland Treasury for updates.

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CONFIDENTIAL

Holly Dahm
[REDACTED]

Email: hollyteganosborne@hotmail.com

Dear Ms Dahm

Your social media posts and LinkedIn profile

1. On 24 July 2025 your supervisor wrote to you raising concerns about posts that you had made on your LinkedIn profile. At that time your LinkedIn profile listed Queensland Treasury as your employer. Your supervisor reminded you to be mindful of what you share on public platforms, and encouraged you to consider removing any mention of Queensland Treasury as your employer from your LinkedIn profile, to avoid any potential misunderstandings.
2. On 29 July 2025, your supervisor wrote to you again in respect of your posts on your LinkedIn profile, and requested you to remove any reference to Queensland Treasury as your employer from your LinkedIn profile by close of business on 30 July 2025. You did not comply with your supervisor's request.
3. Since then, you have made numerous posts on your LinkedIn profile which make accusations about various government entities, and which I consider are likely to have an adverse effect on the reputation of your employer, Queensland Treasury. These posts fail to comply with the requirements of the Code of Conduct for the Queensland Public Service, including clause 1.5 which requires that you ensure your private conduct maintains the integrity of the Queensland public service. I also draw your attention to clause 1.3 of the Code of Conduct, which requires you to take reasonable steps to ensure that any publicly available comment you make will be understood as representing your personal views, not those of government.
4. I have **attached** a copy of the Code of Conduct to this letter.

5. You have included the Queensland Treasury Logo at the top of your LinkedIn profile page. Your profile experience states that you are a Principal Consultant at Queensland Treasury. This shows to the public that you are an employee of Queensland Treasury. Although you are currently absent from the workplace on leave, you remain subject to the terms and requirements of your employment with Queensland Treasury, including compliance with the Code of Conduct. You must comply with those requirements as a condition of your employment.
6. By highlighting on your LinkedIn profile that you are an employee of Queensland Treasury, it is possible that any person who views your profile may consider the posts and comments you make, particularly in respect of matters concerning the Queensland Government and governments in different jurisdictions, to be the views of Queensland Treasury, not merely your personal views.
7. I am very concerned about the derogatory and accusatory language of some of the comments you have made on your LinkedIn profile about Queensland Government entities and, more recently, Commonwealth Government entities and senior office holders, including Australia's Prime Minister, Mr Anthony Albanese. It is possible that some persons viewing those comments and your LinkedIn profile generally may consider that they represent the views of Queensland Treasury.
8. I have **attached** to this letter a copy of the document "*Social Media and the public officer*" prepared by the Crime and Corruption Commission. This document sets out and clarifies the requirements of a public officer when communicating on social media, even if those communication are in a private capacity. It highlights the need for public sector employees, such as you, to comply with the Code of Conduct. This document contains links and references to other Queensland Government documents regarding requirements for a public officer's use of social media. While you should already be aware of those documents, I recommend that you read them to refresh your understanding of how you use social media.

DIRECTIONS

9. Previously, you have been requested to remove references to Queensland Treasury being your employer, from your LinkedIn profile. You have failed to comply with that request.
10. You are now directed to remove all posts on your LinkedIn profile page, or any other social media page which you control, which refer either directly or indirectly to a State or Territory Government or Commonwealth Government related entity, or employees or office holders within those entities, in a manner which can reasonably be construed as derogatory, accusatory or otherwise inappropriate. This direction

includes that you remove any responses you have received to those posts, and any duplicates of those posts created on your profile as a result of you reposting them or other people reposting them.

11. You are also directed to remove all posts on your LinkedIn profile page or any other social media page which you control which might reasonably be considered to have an adverse effect on the reputation of Queensland Treasury or the Queensland Government, or any other government related entity, including their employees and office holders. This direction includes that you remove any responses you have received to those posts, and any duplicates of those posts created on your profile as a result of you reposting them or other people reposting them.
12. You are further directed to remove any reference to your employer on your LinkedIn profile page, and any other profile page of social media which you control, other than the listing of your employer in your work experience.
13. You are directed to comply with the directions listed above no later than 5:00pm on Thursday, 21 August 2025.
14. You are directed not to make any further posts on either LinkedIn or any other social media platform which refer either directly or indirectly to a Queensland Government or other State and Commonwealth Government related entity, including their employees and office holders, in a manner which can reasonably be construed as derogatory, accusatory or inappropriate.
15. You are directed not to make any further posts on either LinkedIn or any other social media platform which might reasonably be considered to have an adverse effect on the reputation of your employer, Queensland Treasury, or the Queensland Government or any other government related entity.
16. You are directed not to post on LinkedIn or any other social media platform you control, any copies or descriptions of communications you have received or may in future receive from your employer, Queensland Treasury. This direction includes this confidential letter which you must not post on social media (either in full or in part) and which you must not refer to, in any way, on either LinkedIn or any other social media platform.
17. If you fail to comply with the directions in this letter, then you may be subject to a disciplinary process under the *Public Sector Act 2022* and potential disciplinary action up to and including termination of your employment.
18. The Employee Assistance Program (EAP) remains available to you and your immediate family if you would like to contract them. TELUS Health provides free,

confidential counselling and wellbeing services with qualified professionals, 24 hours a day. Their phone number is 1800 604 640.

19. If you have any questions about this letter, please contact me by email.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Charalambous', with a stylized flourish at the end.

Chris Charalambous
A/Chief Human Resource Officer

19 / 08 / 2025

Discipline

Directive 05/23 | Effective date: 1/03/2023

Supersedes: 14/20

1. Purpose

- 1.1 To provide information on undertaking disciplinary processes in accordance with the [Public Sector Act 2022](#) (Act).

2. Authorising provisions

- 2.1 [Sections 100](#) and [222](#) of the Act.

3. Application

- 3.1 This directive applies to:
- (a) all public sector employees (defined in [section 12](#) of the Act) in relation to disciplinary processes under [chapter 3](#) of the Act
 - (b) public sector entities as defined in [section 8](#) of the Act
 - (c) chief executives of public sector entities as provided for in [sections 16](#) and [17](#) of the Act, in their capacity as a chief executive of a public sector entity or of public sector employees.
- 3.2 [Section 229](#) of the Act outlines the relationship between a directive and industrial instrument, including where an industrial instrument will prevail over a directive to the extent of any inconsistency.
- 3.3 Commission Chief Executive (CCE) Directive 14/20: Discipline is repealed and superseded by this directive.

4. Principles

- 4.1 Chief executives are responsible for making decisions under the provisions of [chapter 3, part 8, Division 3](#) of the Act.
- 4.2 Chief executives are required to act in a way that is compatible with the main purpose of the Act and how the main purpose is achieved, including fair treatment of public sector employees.
- 4.3 Under the *Human Rights Act 2019* decision makers have an obligation to:
- (a) act and make decisions in a way that is compatible with human rights, and
 - (b) give proper consideration to human rights when making a decision under the Act and Public Sector Commissioner (Commissioner) directives.
- 4.4 Under [chapter 1, part 3](#) of the Act, reframing entities have a unique role in supporting the State government in reframing its relationship with Aboriginal

peoples and Torres Strait Islander peoples by fulfilling certain responsibilities. Under [section 21](#), the chief executive of a reframing entity is responsible for ensuring the entity fulfils this role. Chief executives must consider these responsibilities when applying and making decisions under the Act and Commissioner directives.

- 4.5 Under [chapters 2](#) and [3](#) of the Act chief executives of public sector entities have a duty to promote equity and diversity in relation to employment matters, which includes in the application of and making of decisions under the Act and Commissioner directives.
- 4.6 In addition to any specific requirements in this directive, chief executives of public sector entities are required to consider ways to support accessibility and inclusion for employees when undertaking processes, or applying provisions, under this directive.
- 4.7 A disciplinary process is not a substitute for management action and the need for managers to undertake early intervention to address unacceptable conduct. Early intervention, even in the context of a likely disciplinary process, provides the best opportunity for:
 - (a) the end of unacceptable conduct
 - (b) early resolution
 - (c) preserving working relationships
 - (d) avoiding an unnecessary and disproportionately protracted dispute.
- 4.8 Discipline is not appropriate for matters that may be dealt with through management action, which may include use of alternative dispute resolution, use of warnings, or other management action that is reasonable in the circumstances.
- 4.9 A chief executive must not take disciplinary action against an employee for a matter relating to the employee's performance until they have complied with the positive performance management directive in relation to the matter.
- 4.10 Discipline under [chapter 3](#) of the Act must:
 - (a) be conducted in a timely way, to the extent that is within the control of the chief executive, and without any unreasonable unexplained delay, and
 - (b) be fair, appropriate and proportionate to the seriousness of the work performance matter, and
 - (c) comply with the requirements of the Act, the provisions of this directive and the principles of procedural fairness.

Directions

5. Interpretation of directions

- 5.1 The Act sets the discipline framework for the public sector.
- 5.2 This directive does not replace, modify or revoke any legislative requirements that apply to the management of particular types of complaints (e.g. corrupt conduct under the *Crime and Corruption Act 2001*, public interest disclosures under the *Public Interest Disclosure Act 2010*, or complaints under the *Human Rights Act 2019* (HR Act)).
- 5.3 [Chapter 3, part 8, division 3](#) of the Act, and this directive establishes the standard process to be adopted in discipline matters and does not limit a chief executive's ability referenced in [chapter 3, part 11](#) of the Act to terminate a public sector employee's employment under common law, including summarily, where an employee has engaged in serious misconduct, or by operation of law.

- 5.4 These directions:
- (a) set out the management of disciplinary action, as required under [section 100\(1\)\(a\)](#) of the Act
 - (b) provide for periodic reviews of disciplinary action being considered or undertaken by chief executives of public sector entities as required under [section 100\(2\)\(a\)](#) of the Act
 - (c) establish guidance and procedural fairness requirements for disciplinary action as provided for in [section 100\(2\)\(b\)](#) of the Act, noting that requirements in this directive do not reduce the obligations on an entity at common law
 - (d) outline the circumstances in which a contravention of a relevant standard of conduct under [section 91\(1\)\(h\)](#) of the Act is likely to be considered sufficiently serious to warrant disciplinary action, as required by [section 100\(2\)\(c\)](#) of the Act
 - (e) should be read in conjunction with the relevant authorising provision/s of the Act.
- 5.5 The requirements set out in these directions are binding and must be followed.
- 5.6 A chief executive must consider any guidance material issued by the Commissioner which is identified as guidance material for the purpose of this directive and which is published on the Public Sector Commission's website, or in another publicly available way.

6. Reframing the relationship with Aboriginal peoples and Torres Strait Islander peoples

- 6.1 Chief executives of reframing entities must consider the responsibilities under [section 21](#) of the Act relating to supporting a reframed relationship with Aboriginal peoples and Torres Strait Islander peoples, including but not limited to:
- (a) promoting cultural safety and cultural capability at all levels of the public sector
 - (b) working in partnership with Aboriginal peoples and Torres Strait Islander peoples to actively promote, include and act in a way that aligns with their perspectives, when making decisions directly affecting them
 - (c) promoting a fair and inclusive public sector that supports a sense of dignity and belonging for Aboriginal peoples and Torres Strait Islander peoples
 - (d) supporting the aims, aspirations and employment needs of Aboriginal peoples and Torres Strait Islander peoples and the need for their greater involvement in the public sector.
- 6.2 In the context of promoting cultural safety in disciplinary processes, the matters a chief executive may consider include, but is not limited to:
- (a) recognising culturally significant connections for Aboriginal people and Torres Strait Islander people involved in the process
 - (b) ensuring that the decision maker and any contact officer has an adequate level of cultural capability when conducting a disciplinary process that involves Aboriginal people and Torres Strait Islander people as subject officers
 - (c) ensuring support and communication is appropriate during a disciplinary process
 - (d) considering any elements of conscious or unconscious bias that may impact the process, including mitigation strategies
 - (e) consideration of the cultural rights of Aboriginal peoples and Torres Strait Islander peoples under the HR Act.

7. Requirements to commence a discipline process

- 7.1 [Section 91](#) of the Act provides that a chief executive may discipline an employee if they are reasonably satisfied a ground for discipline arises. A disciplinary ground does not arise in relation to a public sector employee only because the employee's work performance or personal conduct fails to satisfy the work performance and personal conduct principles, or the public sector principles as set out in [section 91\(4\)](#) of the Act. An act or omission that is not compatible with a principle on its own, does not give rise to a disciplinary ground if the act or omission does not meet the threshold of the disciplinary grounds at [section 91](#).
- 7.2 Where a work performance matter arises that may constitute a ground for discipline under [section 93](#) of the Act, a chief executive must determine whether to commence a disciplinary process. In making this determination, the chief executive must assess:
- (a) the seriousness of the employee's personal conduct and/or work performance, and
 - (b) whether the matter should be resolved through management action instead, and
 - (c) whether the matter is a Public Interest Disclosure under the *Public Interest Disclosure Act 2010* and/or whether the matter must first be referred to the Crime and Corruption Commission, Queensland Police Service or other regulatory agency for assessment, and
 - (d) whether management action would alleviate or mitigate the impact of the alleged conduct on the employee, their colleagues, the workplace, the complainant, and the reputation of the public sector, and
 - (e) whether management action has recently been taken for previous similar instance/s of inappropriate conduct, and the management action did not result in sustained correction of the employee's conduct, and
 - (f) if the contravention is of a more serious nature, but is a single and/or isolated incident of poor conduct (that is, not a pattern of unreasonable behaviours), whether the chief executive has reasonable concerns about the employee's potential for modified behaviour through management action that clarifies the expected standards of conduct and provides the opportunity and support for the employee to demonstrate sustained correction of their conduct, and
 - (g) whether further information is required to make a decision to commence a disciplinary process, and
 - (h) for a breach of relevant standard of conduct under [section 91\(1\)\(h\)](#), that it is sufficiently serious to warrant disciplinary action because the chief executive forms a view that management action is not likely to adequately address and/or resolve the work performance matter.
- 7.3 [Section 86](#) of the Act provides that a chief executive must not take disciplinary action against an employee for a matter relating to the employee's performance until the chief executive has complied with the directive about positive performance management.

8. Discipline for conduct in a private capacity

- 8.1 In addition to considering the requirements listed at clause 7, a chief executive must consider whether they are reasonably satisfied alleged conduct could amount to misconduct which reflects seriously and adversely on the public sector entity in which the employee is

employed in determining whether to commence a discipline process in relation to an employee's conduct in a private capacity.

- 8.2 In making a determination under clause 8.1, a chief executive must give consideration to the way in which the person's alleged conduct in a private capacity, if it became known to a reasonable person, reflects seriously and adversely on the entity taking into account all the circumstances including:
- (a) the person's role in the entity, and
 - (b) the entity's functions and responsibilities, and
 - (c) the responsibility on government entities to act with integrity, accountability, in the public interest and in a way that maintains public trust.
- 8.3 A chief executive must also ensure that proper consideration is given to human rights under the HR Act.

9. Discipline process

- 9.1 [Section 98](#) of the Act provides that in disciplining a public sector employee, or former public sector employee, a chief executive must comply with the Act and this directive.
- 9.2 The chief executive must demonstrate consideration of conflicts of interest and ensure conflicts of interest are declared, monitored and appropriately managed by all parties to the disciplinary process.
- 9.3 Show cause process for disciplinary finding
- (a) the chief executive is to provide the employee with written details of each allegation and invite the employee to show cause why a disciplinary finding should not be made in relation to each allegation (a show cause notice on disciplinary finding)
 - (b) written details of each allegation in clause 9.3(a) must include:
 - (i) the allegation
 - (ii) the particulars of the facts considered by the chief executive for the allegation
 - (iii) the disciplinary ground under [section 91](#) of the Act that applies to the allegation
 - (c) when providing the written details required at clause 9.3, a chief executive should not include more than two possible disciplinary grounds for the same allegation. In making a disciplinary finding at clause 9.4, a chief executive must choose the most suitable ground for discipline as no more than one disciplinary ground is to apply to an individual substantiated allegation
 - (d) a copy of all evidence relevant to the facts considered by the chief executive for each allegation in clause 9.3(a) must be provided to the employee, including, where relevant, specific reference to page or paragraph numbers that comprise the relevant evidence
 - (e) the chief executive must provide the employee with a minimum of 14 days from the date of receipt of a show cause notice on disciplinary finding to consider and respond to the notice, having regard to the volume of material and complexity of the matter. The chief executive may grant, and must consider any request for, an extension of time to respond to a show cause notice on disciplinary finding if there are reasonable grounds for extension
 - (f) if the employee does not respond to a show cause notice on disciplinary finding, or does not respond within the nominated timeframe in clause 9.3(e) and has not been granted

an extension of time to respond, the chief executive may make a decision on grounds based on the information available to them.

9.4 Decision on grounds (disciplinary finding)

- (a) the chief executive must review all relevant material, including any submissions from the employee, and make a decision on the disciplinary finding on the balance of probabilities
- (b) the chief executive must advise the employee of the chief executive's finding in relation to each allegation included in the show cause notice on disciplinary finding
- (c) for each finding in clause 9.4(a) the chief executive must clearly explain their finding of fact on the balance of probabilities, including the evidence relied on to reach the finding, and state if the disciplinary ground to which the allegation was applied has been established
- (d) the employee is to be informed of the finding and explanation of the finding in writing, including information that the employee may appeal the disciplinary finding. The employee should also be informed of the time limits for starting an appeal provided for in the *Industrial Relations Act 2016* (IR Act) and the directive relating to appeals
- (e) if the chief executive determines that discipline ground/s have been established, the chief executive may consider whether disciplinary action should be proposed (clause 9.5) and/or management action implemented, or to take no further action. No more than one disciplinary ground is to apply to an individual substantiated allegation
- (f) if the chief executive determines that no ground/s for discipline have been established, the chief executive may consider whether any management action is required and advise the employee in writing.

9.5 Show cause process for proposed disciplinary action

- (a) the chief executive is to provide the employee with written details of the proposed disciplinary action and invite the employee to show cause why the proposed disciplinary action should not be taken (a show cause notice on disciplinary action)
- (b) the chief executive may propose more than one type of disciplinary action, and if relevant, detail any management action to be implemented
- (c) the disciplinary action the chief executive may propose is not limited to the examples of disciplinary action listed in [section 92](#) of the Act
- (d) in proposing appropriate and proportionate disciplinary action, the chief executive should consider:
 - (i) the seriousness of the disciplinary finding
 - (ii) the employee's classification level and/or expected level of awareness about their performance or conduct obligations
 - (iii) whether extenuating or mitigating circumstances applied to the employee's actions
 - (iv) the employee's overall work record including previous management interventions and/or disciplinary proceedings
 - (v) the employee's explanation (if any)
 - (vi) the degree of risk to the health and safety of employees, customers and members of the public
 - (vii) the impact on the employee's ability to perform the duties of their position
 - (viii) the employee's potential for modified behaviour in the work unit or elsewhere
 - (ix) the impact a financial penalty may have on the employee

- (x) the cumulative impact that a reduction in classification and/or pay-point may have on the employee
- (xi) the likely impact the disciplinary action will have on public and customer confidence in the unit/entity and its proportionality to the gravity of the disciplinary finding
- (e) a show cause notice on disciplinary action must only state the employee is liable for termination of employment if the chief executive reasonably believes that the employee might, in the circumstances, have their employment terminated
- (f) the chief executive must provide the employee with a minimum of seven days from the date of receipt of a show cause notice on disciplinary action to consider and respond to the notice, having regard to the volume of material and complexity of the matter. The chief executive may grant, and must consider any request for, an extension of time to respond to a show cause notice on disciplinary action if there are reasonable grounds for extension.
- (g) if the employee does not respond to a show cause notice on disciplinary action or does not respond within the nominated timeframe in clause 9.5(f) and has not been granted an extension of time to respond, the chief executive may make a decision on disciplinary action based on the information available to them.

9.6 Decision on disciplinary action:

- (a) the chief executive must review all relevant material, including any submissions from the employee in response to a show cause notice, and make a final decision on the disciplinary action to be taken
- (b) the chief executive must inform the employee of the decision in writing, including:
 - (i) the reasons for the decision, including consideration of any information provided by the employee in response to a show cause notice
 - (ii) information that the employee may appeal the decision on disciplinary action (except for a termination decision)
 - (iii) for a termination decision, information that the employee may lodge an application for reinstatement under the IR Act
- (c) the chief executive may decide to impose disciplinary action different to the disciplinary action proposed in the show cause notice on disciplinary action, provided that:
 - (i) the revised disciplinary action is objectively less onerous than the original action proposed, or
 - (ii) the employee is given a further opportunity to comment on the appropriateness of the new proposed action, before a final decision on the disciplinary action is made and communicated to the employee, or
 - (iii) the employee has suggested the disciplinary action as an appropriate alternative penalty
- (d) disciplinary action (other than a termination decision) is not to be implemented until the period for an appeal against the decision to discipline the public sector employee has expired, or any appeal lodged is finalised.

9.7 The chief executive may combine the procedural elements of a show cause process for disciplinary finding and a show cause process for proposed disciplinary action where:

- (a) the particulars of the evidence being relied on to determine discipline liability are not likely to be disputed (for example, where the employee has been found guilty, or

- pleaded guilty, to a criminal offence in relation to the conduct the subject of the discipline process, regardless of whether a conviction is recorded in relation to that offence), and
- (b) the chief executive reasonably believes the progression or finalisation of the matter is in the best interests of the employee

9.8 Action taken against a former public sector employee under [section 95](#) and [96](#) of the Act must comply with the requirements of [sections 98](#) of the Act.

10. Support persons and industrial representatives

- 10.1 A subject employee may be supported by a person of their choosing and/or represented by an industrial representative of a union to which the person is a member, provided the support person:
- (a) is not otherwise involved in the disciplinary process (for example, as a subject employee or witness)
 - (b) does not provide direct evidence on behalf of, or otherwise talk for the subject employee.
- 10.2 If a support person is an officer of a union to which the employee is a member, the officer also has a role to support their member's interests, including actively ensuring that procedural fairness has been afforded to their member.

11. Periodic review of discipline process

- 11.1 This section applies to matters involving a public sector employee's work performance or personal conduct, other than corrupt conduct matters.
- 11.2 A chief executive is required to finalise an ongoing discipline process in a timely way.
- 11.3 A discipline process commences when a chief executive writes to the subject employee to inform them that discipline will commence (usually a show cause notice on disciplinary finding).
- 11.4 A discipline process must be reviewed by an independent decision maker at six months and by a chief executive at 12 months and every six months thereafter.
- 11.5 The review must consider whether the discipline process complies with the Act and this directive.
- 11.6 A discipline process must not continue until the review is completed.
- 11.7 The findings of the review must be communicated to the subject employee in writing.

12. Subject employee may ask the Public Sector Commission for a review of discipline process

- 12.1 This section applies to matters involving a public sector employee's work performance or personal conduct, other than corrupt conduct matters.
- 12.2 A subject employee may ask the Public Sector Commission (Commission) to conduct a review of a procedural aspect of the public sector entity's handling of a work performance matter, provided:
- (a) the subject employee reasonably believes the chief executive has not complied with this directive, and
 - (b) the subject employee has used internal review procedures under the directive on individual employee grievances, and

- (c) having used the procedures in clause 12.2(b) the subject employee is dissatisfied with a decision made following the internal review, and
 - (d) a decision has not been made for the work performance matter that the subject employee may appeal under [chapter 3, part 10](#) of the Act.
- 12.3 The subject employee must request the review in writing.
- 12.4 The request under clause 12.3 must address the eligibility for review under clause 12.2 and include:
- (a) a clear statement of how the employee believes the public sector entity has not complied with this directive, and
 - (b) the action the employee seeks from the review.
- 12.5 On receiving the request, the Commission may, but is not required to, conduct a review of a procedural aspect of the public sector entity's handling of a work performance matter contemplated in [section 123](#) of the Act, and may but is not required to give the chief executive a report on the review.
- 12.6 The Commissioner must provide a written decision to the subject employee, along with reasons for the decision, including when the Commissioner decides not to conduct a review under clause 12.5.

Appeals

13. Appeals

- 13.1 A subject employee has a right of appeal in relation to disciplinary findings or a disciplinary decision (with the exception of a termination decision) as provided for under [section 131](#) of the Act.
- 13.2 A subject employee has a right of appeal in relation to a direction given to a chief executive about the handling of a work performance matter, to the extent the direction affects the subject employee, as provided for under [section 131](#) of the Act.
- 13.3 The appeals directive should be referenced for information regarding appeal rights and associated timeframes.

Governance and transitional provisions

14. Records and reporting

- 14.1 Each public sector entity must, upon request, give the Commissioner a report about:
- (a) the number of work performance matters handled by each prescribed entity in the year, and
 - (b) the types of work performance matters handled by each prescribed entity in the year, and
 - (c) information about how work performance matters were handled by each prescribed entity in the year. For example:
 - (i) the period within which the handling of the matters was finalised; and
 - (ii) the outcomes of the handling of the matters.

14.2 The Commission will publish information about this data in a publicly accessible way each financial year.

15. Transitional provisions

15.1 [Sections 312-314](#) of the Act set out the transitional arrangements for disciplinary action and findings made before commencement.

15.2 For matters that commenced prior to the commencement date of this directive:

- (a) Where a discipline review was required to be conducted under the superseded Directive 14/20: Discipline, and was not completed by commencement of this directive, the review must be completed as if Directive 14/20: Discipline remained in operation, or
- (b) Where the review date occurs on or after the commencement date of this directive, the review must be completed in accordance with this directive.

Definitions

Where there is no relevant definition in the Act, terms in this directive have their ordinary meaning and are to be interpreted consistently with established public sector employment practice.

Balance of probabilities refers to the civil standard of proof. For an allegation to be substantiated on the balance of probabilities, the evidence must establish that it is more probable than not that the alleged conduct occurred. The strength of evidence necessary to establish an allegation on the balance of probabilities may vary according to the:

- relevance of the evidence to the allegations
- seriousness of the allegations
- inherent likelihood or improbability of a particular thing or event occurring
- gravity of the consequences flowing from a particular finding.

CCE Directive means a directive issued by the Commission Chief Executive under the repealed *Public Service Act 2008*.

Chief executive in the context of exercising a decision-making power, includes a person to whom the chief executive has delegated the decision-making power under [section 282](#) of the Act.

Commissioner has the meaning provided for under [section 212](#) of the Act.

Disciplinary ground has the meaning provided for under [section 91](#) of the Act.

Disciplinary action has the meaning provided for under [section 92](#) of the Act.

Management action is independent of the disciplinary process and should be considered as the first response and/or alternative to the disciplinary process in managing unacceptable conduct or performance. Following a disciplinary finding (refer to [section 90](#)), management action can accompany or substitute for disciplinary action. If appropriate, management action can replace an ongoing disciplinary process at any stage. While not limited, management action is predominantly focused on corrective action.

Misconduct has the meaning provided for under [section 91\(5\)](#) of the Act.

Procedural fairness is a concept used interchangeably with natural justice and is a right recognised and defined by law that involves two key elements—the hearing rule (the parties shall be given adequate notice of the case against them, and a right to respond) and the bias rule (everyone is entitled to a decision by a disinterested and unbiased adjudicator).

Public sector entity has the meaning provided for under [section 8](#) of the Act.

Reframing entity has the meaning provided for under [section 20](#) of the Act.

Union for the purpose of this directive, means an employee organisation registered under chapter 12 of the IR Act or under the *Fair Work (Registered Organisations) Act 2009* (Cth).

Work performance matter has the meaning provided for under [section 122](#) of the Act.



Queensland Treasury

CONFIDENTIAL

Holly Dahm
[REDACTED]

By email: hollyteganosborne@hotmail.com ; hollydahm@pm.me ;
hollydahm@proton.me

Dear Ms Dahm

SHOW CAUSE NOTICE: DECISION ON DISCIPLINARY FINDING AND PROPOSED DISCIPLINARY ACTION

1. On 19 August 2025, Mr Chris Charalambous (A/Chief Human Resource Officer) sent you a letter in respect of comments you had posted on your LinkedIn profile which made accusations about various government entities, and which Mr Charalambous considered were likely to have an adverse effect on Queensland Treasury's reputation.
2. Mr Charalambous' letter issued you with various directions, and stated that if you failed to comply with the directions, you may be subject to a disciplinary process under the *Public Sector Act 2022* (**PS Act**). A copy of Mr Charalambous' letter is **Attachment 1** to this letter.
3. By letter to you dated 16 September 2025, which was emailed to you at 9.29am on 17 September 2025, I asked you to show cause why a disciplinary finding should not be made against you under the PS Act in relation to the following allegation:

Allegation:

Between 19 August 2025 and 15 September 2025, you have failed to comply with directions issued to you by Chris Charalambous, A/Chief

1 William Street
GPO Box 611 Brisbane
Queensland 4001 Australia
Telephone +61 7 3035 1933
Website www.treasury.qld.gov.au
ABN 90 856 020 239

Human Resource Officer, Treasury on 19 August 2025, and have posted various inappropriate comments on LinkedIn about Treasury employees and Treasury itself, which reflect adversely on Treasury. **(Allegation)**.

4. A copy of my show cause letter to you dated 16 September 2025 and emailed to you on 17 September 2025 (**Show Cause Notice**) is **Attachment 2** to this letter.

NO RESPONSE

5. In the Show Cause Notice, you were provided with 14 days from the date of you receiving the letter, in which to provide a response to the Allegation.
6. By 2 October 2025, 15 days after the date the Show Cause Notice was issued to you, you had not provided any response to it.
7. On 2 October 2025, you were sent you an email from corporate-mailbox@treasury.qld.gov.au to follow up on the Show Cause Notice and which asked whether you intended to provide a response.
8. In this email you were advised as follows:

‘Please note that if we do not hear from you by 5.00pm tomorrow, 3 October 2025, the delegate will proceed to make a decision based on the information currently available’.
9. You posted this email on your LinkedIn profile page, but did not provide any response by 5.00pm on Friday, 3 October 2025.
10. As of the date of this letter you have not provided any response to the Show Cause Notice.
11. I am satisfied that Treasury has taken reasonable steps to make you aware of my letter of 16 September 2025 and that you have elected not to provide a response to it despite having the opportunity to do so within a reasonable time.
12. Accordingly, I will make a decision, based on the information currently

available to me, as to whether you are liable for disciplinary findings. I confirm I have been delegated the functions of the chief executive under the PS Act to make a decision in respect of the matter.

MY FINDINGS

13. I have independently reached my own conclusions regarding the Allegation. I have carefully considered all the material before me. The fact that a particular matter is not specifically addressed in this letter does not mean that I did not carefully consider it.

14. I have determined that the Allegation as set out in paragraph 3 above, is substantiated on the balance of probabilities. This finding is on the following bases.

15. It is not in dispute that:

- a. At all times since 8 July 2024, you have been employed by Treasury as a Principal HR Consultant – Employment Relations (AO7) in the People and Culture Branch, and at all times since 24 March 2025 you have been absent from work on a period of leave.
- b. You are required to ensure that your personal conduct maintains the integrity of the public service and your ability to perform your duties (s 1.5 of the Code of Conduct for the Queensland Public Service (**Attachment 3**), with which you are required to comply), and you are required to ensure that your personal conduct does not reflect adversely on the reputation of the public sector entity in which you are employed (s 40(1)(k) of the PS Act (**Attachment 4**)).
- c. At all times relevant to the Allegation, you had a LinkedIn account in your own name which was publicly accessible, which listed Treasury as your employer, and which had in excess of 5800 followers.
- d. On 24 July 2025, Ms Jasmine Glaister, A/Director, People and Culture, Treasury, sent you an email reminding you to be mindful of what you

shared on public platforms such as LinkedIn, and strongly encouraging you to consider removing any mention of Treasury as your employer from your LinkedIn (**Attachment 5**).

- e. You did not respond to Ms Glaister's email. She sent you another email on 29 July 2025, requesting that you remove any reference from your LinkedIn profile to Treasury being your employer, by close of business on 30 July 2025 (**Attachment 6**).
- f. You did not comply with Ms Glaister's request, and on 29 July 2025, posted a portion of Ms Glaister's 24 July email of to you, on your LinkedIn profile, with the statement *'Sent by the A/Director PID Coordinator I report to – this was not care. It was gaslighting, framing whistleblowing as mental illness to discredit, isolate, and erase. Retaliation in disguise'*.
- g. By letter dated 19 August 2025, Mr Charalambous issued you with the following directions (**Attachment 1**). That by 5.00pm on 21 August 2025, you:
 - i. Remove all posts on your LinkedIn profile page, or any other social media page which you control, which refer either directly or indirectly to a State or Territory Government or Commonwealth Government related entity, or employees or office holders within those entities, in a manner which can reasonably be construed as derogatory, accusatory or otherwise inappropriate. The direction included that you remove any responses you received to those posts, and any duplicates of those posts created on your profile as a result of you reposting them or other people reposting them.
 - ii. Remove all posts on your LinkedIn profile page or any other social media page which you control which might reasonably be considered to have an adverse effect on the reputation of

Treasury or the Queensland Government, or any other government related entity, including their employees and office holders. The direction included that you remove any responses you received to those posts, and any duplicates of those posts created on your profile as a result of you reposting them or other people reposting them.

- iii. Remove any reference to your employer on your LinkedIn profile, and any other profile page of social media which you control, other than the listing of your employer in your work experience.
- iv. Not to make any further posts on either LinkedIn or any other social media platform which refer either directly or indirectly to a Queensland Government or other State and Commonwealth Government entity, including their employees and office holders, in a manner which can reasonably be construed as derogatory, accusatory or inappropriate.
- v. Not to make any further posts on either LinkedIn or any other social media platform which might reasonably be considered to have an adverse effect on the reputation of Treasury, or the Queensland Government or any other government related entity.
- vi. Not to post on LinkedIn or any other social media platform you control, any copies or descriptions of communications you have received or may in future receive from Treasury. The direction included Mr Charalambous' 'confidential letter' (of 19 August 2025), which he stated you must not post on social media (either in full or in part) and which you must not refer to, in any way, on either LinkedIn or any other social media platform.

- h. Mr Charalambous stated in his letter that if you failed to comply with the above directions, you may be subject to a disciplinary process under the PS Act.

16. Having regard to all of the evidence before me, I am satisfied that you failed to comply with Mr Charalambous' directions issued on 19 August 2025, and have failed to provide any explanation or excuse for your non-compliance.

17. To that end, I am satisfied that as at 16 September 2025, (a date which is more than three and a half weeks after 19 August 2025, the date when you were required to comply with Mr Charalambous' directions):

- a. Your LinkedIn profile page still listed you as a Principal Consultant with Treasury. Currently, your LinkedIn profile page still has the Treasury logo at the top of the page.
- b. You had not removed from your LinkedIn profile page, posts pre-dating Mr Charalambous' directions to you of 19 August 2025, referring to a State or Territory Government or Commonwealth Government related entity, or employees or office holders within those entities, in a manner which can reasonably be construed as derogatory, accusatory or otherwise inappropriate. These included:
 - i. the post you made on or shortly before 19 August 2025 about Mr Michael Anthonisz, Chief Economist at Queensland Treasury Corporation (QTC), referring to Mr Anthonisz being Queensland Treasury Corporation's Chief Economist, and having knowledge of alleged 'laundering'. That post, set out at paragraph 17b. of the Show Cause Notice, was visible to your LinkedIn followers. I note that this post still remains on your LinkedIn profile page, albeit slightly edited to refer to Mr Anthonisz by name, with the comment *'You all know about the laundering'*; and
 - ii. the post you made on 29 July 2025, regarding Ms Glaister's email to you of 24 July 2025, referred to in paragraph 15f.

above. I note that this post remains on your LinkedIn profile.

18. I am also satisfied that after receiving Mr Charalambous' letter of 19 August 2025, and up until 15 September 2025, you continued to make posts on your LinkedIn profile, accessible to LinkedIn members, and in contravention of Mr Charalambous' directions issued to you, which referred to a Queensland Government or other State and Commonwealth Government entity, including their employees and office holders, in a manner which could reasonably be construed as derogatory, accusatory or inappropriate, and which might reasonably be considered to have an adverse effect on the reputation of Treasury or another government entity.

19. I am also satisfied that you contravened Mr Charalambous' direction not to post on LinkedIn, copies of any documentation or correspondence you had received or may in future receive from Treasury. In making these findings I note in support, as set out in the Show Cause Notice:

- a. On 21 August 2025, you posted on your LinkedIn profile page a copy of Mr Charalambous' letter to you dated 19 August 2025, with the statement *'19.08.25 12:47 Termination threat from Chris Charalambous A/Chief Human Resources Officer Corporate People & Culture Branch...A Commission would eat you for lunch. I don't need them to. I will'*.
- b. On 19 August 2025, 21 August 2025, 27 August 2025, 1 September 2025 and 2 September 2025, you made various posts on your LinkedIn profile page (as set out in paragraph 17b. of the Show Cause Notice), which referred to Treasury employees, and Treasury itself by name, and made statements referable to them such as:
 - i. *'Chris Charalambous Your letter = Trash NOT Treasury. BIN IT. BIN CHRIS. BIN JASMINE. BIN CCC....Chris Charalambous, Jasmine Glaister & the Crime and Corruption Commission (Queensland) = Corruption. Suppression. Retaliation. Collusion.*

Finished’ (on 21 August 2025);

- ii. *‘When Carol Kahler, General Counsel, Queensland Treasury, is aware and stays silent – that silence is criminal liability’ (on 1 September 2025);*
- iii. *‘Criminal Queensland Treasury...Terminated A/CHRO Chris Charalambous’ contract, returning him to Crown Law Queensland?’ (on 1 September 2025);*
- iv. *‘Nyree Illingsworth...No question – you’re a coward & disgrace...Catherine Shrubsole...No question – you’re a disgrace...Jasmine Glaister...Each action is criminal retaliation. No question – you are not to be trusted & you’re a disgrace...Chhaya Meta...You are a disgrace, disclosed that constructive knowledge yet?...Sam Leblang...No questions. You are a disgrace...Chris Charalambous...No questions. My guess, you’re the ponzy...Jo Keen...You jumped, my view – you knew. Did you disclose?...Paul Williams...Criminal breach of duty is fixed. Did you sign?...Carol Kahler...Concealment of crime is not protected’ (on 2 September 2025).*

- c. On 2 September 2025, you posted on your LinkedIn profile page a recording of a telephone call you had with Chris Charalambous on 26 August 2025, with the following statements *‘A/CHRO Queensland Treasury “Just a welfare check.” Again. Again. Again. Chris – you & Jasmine threatened termination, then offered EAP. Called Riki Dahm twice, lied to him, and sounded excited doing it. That’s sick. We were together. Laughing at you. From 3.6.25 – all criminal’.*

20. Having regard to all of the material before me, I am satisfied that Mr Charalambous’ directions issued to you on 19 August 2025 were lawful and reasonable. It is entirely appropriate that you, as a Treasury employee, ensure that you do not make posts or statements on your social media or LinkedIn

accounts that are disparaging of Treasury, the Queensland Government generally, and Treasury employees, and which could adversely affect Treasury's reputation.

21. I am satisfied, based on the material before me including the Show Cause Notice, that you have repeatedly disregarded and failed to comply with Mr Charalambous' directions issued on 19 August 2025.
22. You have failed to remove from your publicly accessible LinkedIn profile, posts which contain disparaging and highly offensive comments and accusations about Queensland Treasury employees.
23. You have continued to refer to Treasury as your employer on your LinkedIn profile page, despite being directed not to do so other than the listing of your employer in your work experience.
24. You have posted numerous posts on your LinkedIn profile since receiving Mr Charalambous' directions which contain highly inappropriate, offensive and derogatory comments about Treasury and its employees. Some of the comments and accusations made in your posts are of an extremely serious nature, for example, accusing Mr Charalambous and Ms Glaister in posts made on 21 August 2025 and 2 September 2025, of corruption and collusion; accusing Ms Kahler in posts made on 1 and 2 September 2025, of criminal liability; and accusing Treasury in a separate post made on 1 September 2025, of criminal conduct.
25. You have posted on your LinkedIn profile, confidential correspondence provided by Mr Charalambous to you on 21 August 2025, despite being directed not to do so. Additionally, on 2 September 2025, you posted on your LinkedIn profile, a recording of a confidential welfare check phone call Mr Charalambous made to your husband in respect of you on 26 August 2025, and in which you participated. The language that you used in your post of 21 August 2025, about Mr Charalambous' directions, i.e., that the directions constituted a '*termination threat*' and that '*A Commission would eat you for*

lunch...’ was offensive and ridiculing in nature, and demonstrated your absolute disregard for the directions, despite them having been issued by the A/CHRO of Treasury.

26. I am very concerned that you have repeatedly disregarded Mr Charalambous’ clear, lawful and reasonable directions issued to you on 19 August 2025. I am particularly concerned that you have made repeated serious accusations and insulting comments about the conduct of Treasury employees in a public forum where the people about whom you wrote could not properly respond.
27. It is a very serious matter to make accusations of improper conduct against public sector employees, including accusations of criminal conduct, particularly in a public forum such as LinkedIn where it is apparent that you are a Treasury employee, and to disregard, on a repeated basis, lawful and reasonable directions issued to you in the context of your employment.
28. You have failed to respond to the Show Cause Notice, despite being afforded ample time to do so, and you have failed to provide any explanation for your conduct.
29. I am satisfied, based on the evidence before me, that you have deliberately disregarded and ignored the directions issued to you by Mr Charalambous on 19 August 2025, between the period 19 August 2025 and 15 September 2025. The manner in which you have intentionally disregarded those directions is highly disrespectful. I am satisfied that your conduct is very serious and inappropriate. It is entirely inconsistent with your obligations as a Treasury employee and public sector employee generally under the PS Act, which is to maintain the highest standards of ethical conduct, and it has the significant potential to damage the reputation of Treasury and reflect seriously and adversely on the Queensland public sector.
30. Accordingly, I am satisfied on the balance of probabilities that between 19 August 2025 and 15 September 2025, you failed to comply with directions issued to you by Mr Charalambous on 19 August 2025, and posted various

inappropriate comments on LinkedIn about Treasury employees and Treasury itself, which reflect adversely on Treasury.

31. On the basis of my findings in relation to the Allegation, I have determined that pursuant to s 91(1)(b) of the PS Act (**Attachment 7**), you are guilty of misconduct, that is inappropriate or improper conduct in a private capacity that reflects seriously and adversely on the public sector entity in which you are employed (Treasury) within the meaning of s 91(5)(b) of the PS Act.

SHOW CAUSE AS TO PROPOSED DISCIPLINARY ACTION

32. On the basis of my findings in relation to the Allegation against you and my determination that the above discipline ground in s 91(1)(b) of the PS Act exists, I am now considering whether disciplinary action should be taken against you.
33. Sections 92 and 93 of the PS Act (**Attachment 8**) state that the chief executive may take action that the chief executive considers reasonable in the circumstances, and may for example, take one or more of the following disciplinary actions:
- a. termination of employment;
 - b. reduction of classification level and a consequential change of duties;
 - c. transfer or redeployment to other public sector employment;
 - d. forfeiture or deferment of a remuneration increment or increase;
 - e. reduction of remuneration level;
 - f. imposition of a monetary penalty;
 - g. if a penalty is imposed, a direction that the amount of the penalty be deducted from the employee's periodic remuneration payments;
and/or
 - h. a reprimand.

34. In relation to the taking of disciplinary action, I am currently giving serious consideration to the **termination of your employment**.
35. In terms of the principles of natural justice, no final determination of the disciplinary action to be taken has yet been made, or will be made, until you have had the opportunity to respond.
36. Therefore, you are afforded a period of seven (7) days from the date of your receipt of this letter to show cause why the above disciplinary action should not be taken. You are required to provide your response marked 'Private and Confidential' to me. If you intend to reply by email, please address your response to me at corporate-mailbox@treasury.qld.gov.au and ensure that any documents you intend to rely on are attached.
37. Your response will be considered in my final determination of the disciplinary action, together with consideration of the following:
- a. the seriousness of the disciplinary finding;
 - b. your classification level and/or expected level of awareness about your performance or conduct obligations;
 - c. whether extenuating or mitigating circumstances applied to your actions;
 - d. your overall work record including previous management interventions and/or disciplinary proceedings;
 - e. your explanation (if any);
 - f. the degree of risk to the health and safety of employees, customers and members of the public;
 - g. the impact on your ability to perform the duties of your position;
 - h. your potential for modified behaviour in the work unit or elsewhere;
 - i. the impact a financial penalty may have on you;

- j. the cumulative impact that a reduction in classification and/or pay-point may have on the you; and
- k. the likely impact the disciplinary action will have on public and customer confidence in Treasury and its proportionality to the gravity of the disciplinary finding.

38. If you do not respond, or if your response is received later than seven (7) days from your receipt of this letter, I will make a final decision based on the material that is currently before me.

APPEAL ENTITLEMENTS

39. If you believe that my decision to find that the allegation above is substantiated and disciplinary grounds exist (disciplinary finding decision), is unfair and unreasonable, your appeal rights vary depending on my final decision on the discipline to be imposed.

40. If, after considering any submission you may make, I decide the disciplinary action is termination of employment, your PS Act appeal rights lapse once the termination decision is implemented. Therefore, if you wish to lodge an appeal under the appeal provisions of the PS Act about the disciplinary finding decision, you must exercise your appeals rights urgently and before a decision to terminate employment (if it were to be made) is implemented.

41. In the event that a decision to terminate employment is implemented, you may still lodge an application for reinstatement under the *Industrial Relations Act 2016* with the Queensland Industrial Relations Commission (QIRC) Registry. The QIRC Registry will be able to provide further information about an application for reinstatement (www.qirc.qld.gov.au; Tel: 1300592987 or 32278060). If after considering any submission you may make I decide that the disciplinary action (if any) is not termination of employment, you retain appeal rights under the PS Act and you will be advised of them at that time.

DIRECTIONS IN 19 AUGUST LETTER

42. Please be aware that the directions given to you in Mr Charalambous' letter of 19 August 2025 letter (attached) remain in place. You are required to comply with those directions.

CONFIDENTIALITY

43. You are reminded that the matters which are the subject of this disciplinary process are confidential. This is to ensure the integrity of the process.

44. You must not discuss this matter with your work colleagues apart from your union, legal representative or support person without seeking my prior consent. You must not post this letter or any part of it on LinkedIn or any other social media platform. You must not discuss or comment on this letter on LinkedIn or any other social media platform. You are also reminded that the provisions of the Code of Conduct continue to apply throughout the disciplinary process.

45. In the event you consider it necessary to contact a particular Treasury employee in relation to this matter you are directed to send your request to corporate-mailbox@treasury.qld.gov.au and your request will be forwarded to me for consideration.

HUMAN RIGHTS

46. I have considered the relevant sections of the *Human Rights Act 2019* (HR Act) when making a disciplinary finding and proposing the disciplinary action of the termination of your employment.

47. I acknowledge that my decision to make a disciplinary finding and propose disciplinary action may impact and potentially limit your human rights including the right to take part in public life, right to privacy and the right to reputation, which extends to protect professional relationships and reputation.

48. However, in my view, any limitation is demonstrably justified. This is because it is in the public interest to ensure that public sector employees comply with

the lawful and reasonable directions given to them, and that they conduct themselves appropriately and properly where their conduct in a private capacity might reflect seriously and adversely on the public sector entity in which they are employed. I consider that this outweighs the limited potential impact on your human rights at this time. Further, at all times during the disciplinary process you have been afforded procedural fairness and an opportunity to respond to the proposed disciplinary findings and proposed disciplinary action.

49. Accordingly, I consider that my decision to make a disciplinary finding and to propose the disciplinary action of the termination of your employment is compatible with human rights under the HR Act.

EMPLOYEE ASSISTANCE SERVICE

50. I remind you that the Employee Assistance Service, provided through TELUS Health, is available to Treasury employees free of charge. TELUS Health provides a free and confidential counselling and support service that is available 24 hours a day, 7 days a week on 1800 604 640.

Yours sincerely



Drew Ellem

Deputy Under Treasurer
Corporate and Executive Services
Queensland Treasury

21 / 11 / 2025



Queensland Treasury

CONFIDENTIAL

Holly Dahm
[REDACTED]
[REDACTED]

By email: hollyteganosborne@hotmail.com ; hollydahm@pm.me ;
hollydahm@proton.me

Dear Ms Dahm

DECISION ON DISCIPLINARY ACTION

1. On 21 November 2025, I sent you a letter in which I found the following allegation substantiated:

Between 19 August 2025 and 15 September 2025, you have failed to comply with directions issued to you by Chris Charalambous, A/Chief Human Resource Officer, Treasury on 19 August 2025, and have posted various inappropriate comments on LinkedIn about Treasury employees and Treasury itself, which reflect adversely on Treasury.

2. On the basis of my findings in relation to the allegation, I determined that pursuant to s 91(1)(b) of the *Public Sector Act 2022 (PS Act)* you are guilty of misconduct, that is inappropriate or improper conduct in a private capacity that reflects seriously and adversely on the public sector entity in which you are employed (Queensland Treasury) within the meaning of s 91(5)(b) of the PS Act.
3. I afforded you a period of seven days from your receipt of my letter dated 21 November 2025 (**Disciplinary Findings Letter**) to show cause as to why the disciplinary action of termination of your employment should not be taken.
4. To date, you have not provided any response to the Disciplinary Findings Letter, despite **thirteen** days elapsing since its issue.

1 William Street
GPO Box 611 Brisbane
Queensland 4001 Australia
Telephone +61 7 3035 1933
Website www.treasury.qld.gov.au
ABN 90 856 020 239

5. I am satisfied that you received the Disciplinary Findings Letter, because the Letter was emailed to your email address as known to Queensland Treasury and you have not advised of a change to your contact details. Further, my email to you dated 21 November 2025 to your known email address was successfully delivered and did not return as undeliverable.
6. I am satisfied that Queensland Treasury has taken reasonable steps to make you aware of my Disciplinary Findings Letter and that you have elected not to provide a response to it, despite having the opportunity to do so within a reasonable time.
7. Accordingly, I will make a decision based on the information currently available to me, as to whether you are liable to disciplinary action and, if so, the appropriate action to impose. To that end, I have been delegated the functions of the chief executive under the PS Act for this matter.

DECISION ON DISCIPLINARY ACTION

8. I have independently reached my own conclusion regarding the matter. I have carefully considered all of the material before me. The fact that a particular matter is not specifically addressed in this letter does not mean that I did not carefully consider it.
9. I have carefully considered all of the evidence available to me in relation to the above substantiated allegation. You did not respond to the Disciplinary Findings Letter and have therefore not made any submissions about matters you consider I should take into consideration in relation to the appropriateness of the proposed disciplinary action, nor have you objected to the proposed penalty.
10. In reaching my decision on disciplinary action to be taken, I have had regard to the following:
 - a. At all times since 8 July 2024, you have been employed by Queensland Treasury as a Principal HR Consultant – Employment Relations (AO7) in the People and Culture Branch, and at all times since 24 March 2025 you have been absent from work on a period of leave.
 - b. You have at all relevant times been required to ensure that your personal

conduct maintains the integrity of the public service and your ability to perform your duties (s 1.5 of the Code of Conduct for the Queensland Public Service, with which you are required to comply), and you have been required to ensure that your personal conduct did not reflect adversely on the reputation of the public sector entity in which you are employed (s 40(1)(k) of the PS Act).

- c. At all times relevant to the allegation, you had a LinkedIn account in your own name, which was publicly accessible, which listed Queensland Treasury as your employer, and which had in excess of 5,800 followers.
- d. On 29 July 2025, Ms Jasmine Glaister, A/Director, People and Culture, Queensland Treasury, sent you an email reminding you to be mindful of what you shared on public platforms such as LinkedIn. You did not respond to Ms Glaister's email. She sent you another email on 29 July 2025, requesting that you remove any reference from your LinkedIn profile to Queensland Treasury being your employer, by close of business on 30 July 2025.
- e. You did not comply with Ms Glaister's request. By letter dated 19 August 2025, Mr Charalambous issued you with numerous directions regarding making posts on LinkedIn or any other social media platform.
- f. In my Disciplinary Findings Letter, I found that you have repeatedly and deliberately failed to comply with Mr Charalambous' directions issued on 19 August 2025, and failed to provide any explanation or excuse for your non-compliance. I have found that, contrary to Mr Charalambous' lawful and reasonable directions issued, you:
 - i. Failed to remove from your publicly accessible LinkedIn profile, posts which contained disparaging and highly offensive comments and accusations about Queensland Treasury employees;
 - ii. Continued to refer to Queensland Treasury as your employer on your LinkedIn profile page;
 - iii. Posted numerous posts on your LinkedIn profile since receiving

Mr Charalambous' directions, which contained highly inappropriate, offensive and derogatory comments about Queensland Treasury and its employees;

iv. Posted on your LinkedIn profile, confidential correspondence provided by Mr Charalambous to you on 21 August 2025, and on 2 September 2025, posted on your LinkedIn profile a recording of a confidential welfare check phone call Mr Charalambous made to you on 26 August 2025.

g. I found that it was very concerning that you had repeatedly disregarded Mr Charalambous' clear, lawful and reasonable directions, in particular that you had made repeated serious accusations and insulting comments about the conduct of Queensland Treasury employees in a public forum where the people about whom you wrote could not properly respond.

h. I found that it was a very serious matter to make accusations of improper conduct against public sector employees, including accusations of criminal conduct, particularly in a public forum such as LinkedIn where it is apparent that you are a Queensland Treasury employee, and to disregard, on a repeated basis, lawful and reasonable directions issued to you in the context of your employment.

i. I found that the manner in which you had intentionally disregarded Mr Charalambous' directions was highly disrespectful; your conduct was entirely inconsistent with your obligations as a Queensland Treasury employee and public sector employee generally under the PS Act, which is to maintain the highest standards of ethical conduct; and your conduct had the significant potential to damage the reputation of Queensland Treasury and reflect seriously and adversely on the Queensland public sector.

11. Your employment as a Principal HR Consultant – Employment Relations (AO7) comes with the requirement for a high degree of trust and confidence. I am satisfied that at all times relevant to the allegation, you were well aware, or ought to have been well aware of the requirement to comply with lawful and reasonable directions issued to you by Queensland Treasury, and more

generally, your obligations under the Code of Conduct.

Your repeated refusal to comply with Mr Charalambous' directions, and the serious and highly offensive and inappropriate nature of your posts on LinkedIn, demonstrate to me a repeated and conscious disregard and refusal on your part to comply with the directions of your employer and therefore, the terms and conditions of your employment.

12. Overall, I find your conduct was unacceptable, inexcusable, extremely serious and fundamentally inconsistent with the role of a Principal HR Consultant – Employment Relations (AO7) and the standards expected of an employee of Queensland Treasury. Your conduct demonstrates a complete disregard for the obligations arising from your special position of trust and confidence as placed in you by Queensland Treasury, and contempt for Queensland Treasury and its employees.
13. I am significantly troubled that throughout the disciplinary process, you have failed to engage in the process and have not acknowledged nor accepted any wrongdoing in relation to your conduct that is the subject to the allegation. Accordingly, your failure to respond to the allegation and to respond to my letters throughout this disciplinary process, has significantly undermined my trust and confidence in you as an employee of Queensland Treasury.
14. Trust and confidence is an essential part of any employment relationship. However, you have broken Queensland Treasury's and the community's trust in you by engaging in the inappropriate conduct. Your conduct has caused me to lose trust and confidence in your ability to perform your duties to the standard expected of a Principal HR Consultant – Employment Relations (AO7) and a public sector employee. I do not consider that this trust and confidence can be recovered.
15. Due to your failure to provide any response to my letters dated 16 September 2025 and the Disciplinary Findings Letter dated 21 November 2025, I am satisfied you have shown no remorse for your actions; no insight into the seriousness of your conduct; you have not taken responsibility for your actions; and have not provided any indication that you are dedicated to your role as Principal HR Consultant – Employment Relations (AO7) at Queensland Treasury. You have

also failed to provide me with any response in relation to any mitigating factors or personal circumstances you wish me to consider or the potential disciplinary action to be imposed.

16. Notwithstanding the lack of submissions from you, I have taken into account your length of service with Queensland Treasury of approximately 2.6 years (cumulative). I have also had regard to your overall work record, namely your previous unblemished disciplinary record during your employment with Queensland Treasury. However, I do not consider that these factors outweigh the extreme seriousness of your conduct on this occasion, which falls well below the standard expected of an employee of Queensland Treasury.
17. You have not provided me with any submissions with respect to any financial or personal circumstances you wish me to consider when determining my decision on disciplinary action. For completeness, I acknowledge that while there may be financial repercussions for you if your employment as a Principal HR Consultant – Employment Relations (AO7) was to be terminated due to your conduct, I do not consider any such circumstances would outweigh the seriousness of your conduct.
18. I consider the conduct you have engaged in to be extremely serious, falling well below the standards expected of you as a Principal HR Consultant – Employment Relations (AO7) and public sector employee generally. You have demonstrated behaviour that is inconsistent with the standards expected not only of employees of Queensland Treasury, but all public servants. Your behaviour, which concerningly was repeated, was highly inappropriate and unprofessional. Your conduct also calls into question whether you are capable of making ethical decisions, complying with directions, or acting with honesty and integrity in the future.
19. You have not made any submissions as to why the proposed disciplinary action should not be imposed, nor provided me with any alternative disciplinary action you wish me to consider, despite having the opportunity to do so. For completeness, I do not consider the imposition of an alternative penalty would adequately reflect the seriousness of your conduct or would be appropriate in the circumstances. I consider the proposed penalty of termination of your

employment is an appropriate consequence in response to your conduct because it demonstrates the seriousness with which Queensland Treasury views your conduct, and further demonstrates that such conduct exhibited by Queensland Treasury employees will not be tolerated in the future.

20. In light of all of the circumstances, particularly the seriousness of your conduct, I have no trust and confidence in your ability to perform duties to the standard expected of a Principal HR Consultant – Employment Relations (AO7). Further, I have no trust or confidence that you would not engage in similar behaviour in the future. Ultimately, I have lost trust and confidence in your ability to discharge your duties as a Principal HR Consultant – Employment Relations (AO7).
21. Having regard to the seriousness of your conduct, your blatant disregard for your obligations as a Queensland Treasury employee, and the fact your conduct had the significant potential to damage the reputation of Queensland Treasury and reflect seriously and adversely on the Queensland public sector generally, I am satisfied the termination of your employment as a Principal HR Consultant – Employment Relations (AO7) is a fair and just penalty in the circumstances, and adequately reflects the seriousness with which I view your conduct.
22. Accordingly, I have determined to take the disciplinary action of **termination of your employment effective immediately** from the date of your receipt of this letter. You will be paid an amount in lieu of notice, together with any outstanding leave accruals, in accordance with your industrial entitlements.

HUMAN RIGHTS

23. I have considered the relevant sections of the *Human Rights Act 2019* when determining to impose the disciplinary action of termination of your employment.
24. In my view, the human rights potentially impacted by the decision to terminate your employment, include the right to participate in public life (through employment in the public sector), the right to privacy, and right to reputation (which extends to professional relations and reputation).
25. I acknowledge that my decision to impose the disciplinary action of terminating

your employment may impact and potentially limit your human rights including the right to take part in public life, right to privacy and the right to reputation, which extends to protect professional relationships and reputation. This is because the disciplinary action will form part of your formal disciplinary history and may need to be disclosed in certain circumstances. This may for instance have a negative impact on your prospects of obtaining employment elsewhere in the public sector in the future. However, in my view, any limitation is demonstrably justified. This is because it is in the public interest to ensure that public sector employees comply with the lawful and reasonable directions given to them, and that they conduct themselves appropriately and properly where their conduct in a private capacity might reflect seriously and adversely on the public sector entity in which they are employed. I consider that this outweighs the limited potential impact on your human rights.

26. Further, throughout the disciplinary process, you have been afforded procedural fairness and an opportunity to respond to the proposed disciplinary findings and proposed disciplinary action. It has been your own choice not to avail yourself of that opportunity.
27. Accordingly, I consider that my decision to make disciplinary findings and to take the disciplinary action of the termination of your employment is compatible with human rights under the *Human Rights Act*.

APPLICATION FOR REINSTATEMENT

28. You may lodge an application for reinstatement in accordance with Chapter 8, Part 2 of the *Industrial Relations Act 2016* (Qld) with the Queensland Industrial Relations Commission within **21 calendar days** of receipt of this letter.
29. Information about lodging an application for reinstatement can be obtained from the website www.qirc.qld.gov.au.

DISCLOSURE REQUIREMENTS

30. Chapter 3, Part 5, Division 5 of the PS Act provides that applicants (when applying for employment with the Queensland public sector) may be required to disclose their previous history of serious disciplinary action (this includes the decision to terminate your employment). This requirement is reflected in the Recruitment

and Selection Directive 07/23.

EMPLOYEE ASSISTANCE SERVICE

31. Queensland Treasury's Employee Assistance Service, provided through TELUS Health, will be made available to you for a period of **three** weeks from the date of this letter should you wish to contact them. TELUS Health provides a free and confidential counselling and support service that is available 24 hours a day, 7 days a week on 1800 604 640.

Yours sincerely



Drew Ellem
Deputy Under Treasurer
Corporate and Executive Services
Queensland Treasury

5 / 12 / 2025

C2026/9566 | Applicant's Material Relied Upon 14 August 2026 | Form F9 + Attachments 1–7 | CBA WS Deloitte AU620871X | OCO PID-2025-800051

From rikidahm@proton.me <rikidahm@proton.me>
 To chambers.simpson.c@fwc.gov.au
 CC humanresources@treasury.qld.gov.au, Aimee.DePass@crownlaw.qld.gov.au,
 Holly Dahm <hollydahm@proton.me>, CSPClientServices@fwc.gov.au,
 Fair Work Commission <CSPCaseManagement@fwc.gov.au>, lodge@fwc.gov.au,
 contact.us@crownlaw.qld.gov.au
 Date Friday, August 14th, 2026 at 4:57 PM

Dear Associate,

I represent the Applicant in **C2026/9566**.

At today's conference, Commissioner Simpson stated that he will determine the **three jurisdictional objections on the papers and issue a written decision**.

When invited to respond, I stated:

“The Applicant relies on the material lodged and served.”

That material is the Applicant's **Form F9 and Attachments 1–7 lodged with the Commission and served on the Respondent on 24 July 2026**, as recorded in the forwarded lodgment email below.

I reattach the identical documents:

Form F9 – Application under s 773

Attachment 1 – Queensland Treasury medical certification, approved sick leave and Australian Retirement Trust/QSuper Income Protection records

Attachment 2 – 16 September 2025 Show Cause Notice

Attachment 3 – 22 September 2025 Medical Certificate

Attachment 4 – 5 December 2025 Termination Decision

Attachment 5 – 29 December 2025 Specialist Report, Dr Robyn Cheuk

Attachment 6 – Medical Certificates dated 31 March 2026 and 29 May 2026

Attachment 7 – Queensland Industrial Relations Commission email dated 17 October 2025

These are the same documents lodged and served on 24 July 2026. Nothing new is lodged or relied upon. This email does not amend, supplement or replace the Applicant's case and makes no further submissions.

The Respondent is copied and served again with the identical documents.

Please place this email and the reattached **Form F9 and Attachments 1–7** on the Commission file for **C2026/9566** and before **Commissioner Simpson for determination of the three jurisdictional objections**, and confirm by return email.

Kind regards,

Riki Lee Dahm

Applicant's Representative

for Holly Tegan Dahm

C2026/9566

0424 161 433

rikidahm@proton.me

Related references

CBA WS (Deloitte): **AU620871X**

OCO PID: **PID-2025-800051**

Attachments: Form F9 + Attachments 1–7

Sent with [Proton Mail](#) secure email.

----- Forwarded Message -----

From: hollydahm@proton.me <hollydahm@proton.me>

Date: On Friday, July 24th, 2026 at 5:35 PM

Subject: Form F9 | Holly Tegan Dahm v State of Queensland acting through Queensland Treasury | s 773 Fair Work Act 2009 | CBA WS Deloitte AU620871X | OCO PID-2025-800051

To: lodge@fwc.gov.au <lodge@fwc.gov.au>, CSPCaseManagement@fwc.gov.au <CSPCaseManagement@fwc.gov.au>, gpt@fwc.gov.au <gpt@fwc.gov.au>

CC: rikidahm@proton.me <rikidahm@proton.me>, rhondaannknyvett@proton.me <rhondaannknyvett@proton.me>, humanresources@treasury.qld.gov.au <humanresources@treasury.qld.gov.au>, pidcoordinator@treasury.qld.gov.au <pidcoordinator@treasury.qld.gov.au>

Dear Registry,

Please find attached my signed **Form F9 – Application for the Fair Work Commission to Deal with an Unlawful Termination Dispute** under s 773 of the Fair Work Act 2009, dated **24 July 2026**, together with the following supporting documents:

- **Attachment 1** – Queensland Treasury medical certification, approved sick leave and Australian Retirement Trust (formerly QSuper) Income Protection records.
- **Attachment 2** – 16 September 2025 Show Cause Notice.
- **Attachment 3** – 22 September 2025 Medical Certificate (Dr Rory Compton).
- **Attachment 4** – 5 December 2025 Termination Decision.
- **Attachment 5** – 29 December 2025 Specialist Report (Dr Robyn Cheuk).

- **Attachment 6** – Continuing Medical Certificates dated 31 March 2026 and 29 May 2026.
- **Attachment 7** – Queensland Industrial Relations Commission email dated 17 October 2025 recording my medical circumstances and placing Matter PSA/2025/205 into abeyance pending advice that I was fit to proceed.

The application concerns the termination of my employment by the **State of Queensland acting through Queensland Treasury** on **5 December 2025**.

For identification and complete disclosure, this correspondence refers to the following related protected disclosure matters:

- Commonwealth Bank of Australia Whistleblower Service (administered by Deloitte) Reference **AU620871X**; and
- Office of the Commonwealth Ombudsman Protected Disclosure Reference **PID-2025-800051**.

Those references identify related protected disclosure matters forming part of the surrounding factual and procedural chronology. The prohibited reason relied upon in the attached Form F9 is **physical or mental disability**.

For the avoidance of doubt, **Holly Tegan Dahm** is the Applicant in this proceeding. **Riki Lee Dahm** is the Applicant's sole representative for this Fair Work Commission matter and is also the nominated payer of the application fee.

Holly Tegan Dahm, Riki Lee Dahm and Rhonda Ann Knyvett are joint protected disclosers in relation to protected disclosure references AU620871X and PID-2025-800051. Riki Lee Dahm and Rhonda Ann Knyvett are copied to this correspondence solely in that capacity. Neither is a party to this Fair Work Commission proceeding by reason only of being copied to this email.

The Respondent, **State of Queensland acting through Queensland Treasury**, is copied for service through the Queensland Treasury Human Resources inbox at humanresources@treasury.qld.gov.au, for the attention of the Chief Human Resources Officer.

This email, together with the attached signed Form F9 and Attachments 1 to 7, constitutes service of those documents on the Respondent at the same time they are lodged with the Fair Work Commission.

The application fee is to be paid by credit card. The nominated payer is:

Riki Lee Dahm

Phone: 0424 161 433

Email: rikidahm@proton.me

Please contact the nominated payer through the Commission's secure payment process.

I respectfully request written confirmation of:

1. Receipt of the signed Form F9 and Attachments 1 to 7.
2. The recorded date and time of lodgment.
3. The allocated Fair Work Commission matter number.
4. The status of payment processing.
5. Confirmation that service of the attached documents on the Respondent has been noted from this correspondence, if applicable.
6. Any further administrative requirement.

All correspondence, notices and directions concerning this proceeding should be sent in writing by email to both me and my representative.

Kind regards,

Holly Tegan Dahm

Applicant

Mobile: 0401 219 842

Email: hollydahm@proton.me

Representative: Riki Lee Dahm

Phone: 0424 161 433

Email: rikidahm@proton.me

Related References (for identification only)

Queensland Treasury Employee No.: **1452279**

Australian Retirement Trust (formerly QSuper) Income Protection Claim: **CLM-315008**

Commonwealth Bank of Australia Whistleblower Service (Deloitte): **AU620871X**

Office of the Commonwealth Ombudsman Protected Disclosure: **PID-2025-800051**

This correspondence is sent on behalf of the joint protected disclosers **Holly Tegan Dahm, Riki Lee Dahm and Rhonda Ann Knyvett** in relation to the protected disclosure references identified above. That statement does not alter the parties to, or representation in, this Fair Work Commission proceeding.

12.46 MB 10 files attached

- 06_Attachment_6_Continuing_Medical_Certificates.pdf 133.48 KB
- 07_Attachment_7_QIRC_Abeyance_Email.pdf 203.42 KB
- 05_Attachment_5_Dr_Robyn_Cheuk_Specialist_Report.pdf 208.22 KB
- 03_Attachment_3_Dr_Rory_Compton_Medical_Certificate.pdf 1.47 MB
- 04_Attachment_4_Termination_Decision.pdf 1.83 MB
- 00_Holly_Tegan_Dahm_Form_F9_Unlawful_Termination_Application_2026-07-24.pdf 163.44 KB
- 01_Attachment_1_Treasury_Medical_and_ART_Records.pdf 2.34 MB
- 02_Attachment_2_Show_Cause_Notice.pdf 6.13 MB
- publickey - hollydahm@proton.me - 0x3CEBE436.asc 889 bytes
- publickey - rikidahm@proton.me - 0x4C7FA2D7.asc 889 bytes