

NOTICE OF FILING

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A handwritten signature in blue ink, reading "Sia Lagos".

Registrar

Important Information

This Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

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Form 59
Rule 29.02(1)

Affidavit

No. VID44 of 2023

Federal Court of Australia
District Registry: Victoria
Division: Fair Work

Sally Rugg

Applicant

The Commonwealth of Australia and another
Respondents

Affidavit of: **Monique Marie Ryan**
Address: 145 Camberwell Road, Hawthorn East 3123
Occupation: Member of Parliament
Date: 2 February 2023

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Filed on behalf of (name & role of party) Dr Monique Ryan, MP, the Second Respondent
Rick Catanzariti

Prepared by (name of person/lawyer) _____

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I, Monique Marie Ryan, affirm:

1. I am the Second Respondent.
2. The statements made in this affidavit are made from my own knowledge and belief, unless otherwise stated. Where statements are not made from my own knowledge, they are made to the best of my information and belief, and I have set out the sources of my information.

Background

3. I am the Independent Federal Member for Kooyong in the 47th Parliament of Australia.
4. I was elected as a Member of Parliament (**MP**) at the 21 May 2022 election.
5. Prior to standing for Parliament in 2022, I worked as a paediatric neurologist. This included working as the Director of the Neurology Department at the Royal Children's Hospital in the eight years immediately before I was elected to Parliament.

Mon. B. - E. Gale

6. I am an independent MP. I sit on the crossbench. My commitment is to serve the people of Kooyong and their interests and not to any donor, lobbyist or political party.
7. I have been referred to in the media and by the public as one of the “teal” independents.
8. My current policy priorities are:
 - (a) action on climate change;
 - (b) a strong and sustainable economy;
 - (c) integrity and honesty in politics;
 - (d) equality, respect and safety for women;
 - (e) diversity and inclusion; and
 - (f) health care.

Staffing of my office

9. All senators and MPs are entitled to four electorate officers to work in their offices. Some members are entitled to additional electorate officers depending on the size of their electorate. In addition to the electorate officers, the Prime Minister may at his or her discretion allocate a number of personal or parliamentary staff to a senator or MP. The Commonwealth funds the employment of personal or parliamentary staff.
10. The Commonwealth does not fund the employment of any staff beyond the allocated electorate officers and parliamentary staff.
11. After I was elected to parliament, I had to wait (along with the other crossbenchers) until I was informed of my staffing allocation before I could form a team and employ staff in my electorate office. I did not advertise any position in my office until I heard from the Prime Minister about staff allocations.
12. In the previous parliament, crossbench MPs and Senators were entitled to four parliamentary staff in addition to their four electorate officers.
13. On 24 June 2022, I received a letter from Prime Minister Albanese which stated that my staffing allocation was one additional full-time staff member at the Adviser classification, in addition to the four-electorate staff. Now produced and shown to me and marked **MR-1** is a copy of the letter from the Prime Minister to me dated 24 June 2022.

Mr. B. — El. Cole

14. The staff allocated to me by the Prime Minister are employed by the Commonwealth, not by me. The Commonwealth is responsible for employing those staff and funding all employment entitlements for those staff.
15. Many of the crossbench, including me, were concerned that the reduction in personal advisor numbers from four to one would place an undue workload on staff and would impede our ability to work independently. I am aware that those concerns have been conveyed to government Ministers and to the Department of the Prime Minister and Cabinet since the crossbench staffing allocations were communicated in June 2022.
16. In an ideal world, it would have been preferable to have more Commonwealth resources available for staffing in my office. However, I accepted that there was no budget allocation for this and that this was the allocation made by the Government.
17. I had full discretion as to who would be employed as my parliamentary staff member (**parliamentary staffer**), the title they would be given, and the duties I would allocate to them to perform.
18. I decided my parliamentary staffer would have the title Chief of Staff.
19. From my perspective, the Chief of Staff was the most critical position in my office and would be my right-hand person. I knew that I needed someone who I could build a very close and trusting relationship with, and who would be loyal to me and passionate about the role and my electorate.
20. In late June 2022, I developed a position description for the Chief of Staff role for my office. The position description is annexed to the Affidavit of Sally Rugg affirmed 25 January 2023 (**Rugg Affidavit**) as SR-3.
21. The position description described the Chief of Staff role as:
 - (a) a strategic role with oversight of policy development and parliamentary activities, managing relationships with staff and stakeholders, oversight of the planning and execution of budget, staffing and administration of my electorate and parliamentary offices;
 - (b) building and managing a high performing team of electorate staff to ensure the team works strategically and collaboratively to deliver for the people of Kooyong;
 - (c) providing expert and timely advice to me on complex and sensitive parliamentary, legislative, policy and political issues and advising and supporting me in a wide variety of meetings, consultations and negotiations;

Mr. B. — E. Cole

- (d) developing and executing a media and communications strategy for me, and being responsible for drafting media responses, speeches, social media posts, website copy and constituency newsletters;
 - (e) requiring versatility, flexibility, the ability to work to very tight deadlines, loyalty and confidentiality.
22. The position description also set out the responsibilities for the role, including:
- (a) building and managing a high performing team of paid and volunteer staff, including position descriptions, and professional development;
 - (b) formulating strategy for my engagement with government, the electorate and key stakeholders, including identifying the aims, objectives, strategies, responsibilities, timelines, performance indicators and resources required to achieve my goals;
 - (c) preparing and presenting a yearly budget for my approval, across all activities;
 - (d) providing expert and timely advice to me on parliamentary, legislative, policy, political and constituency issues;
 - (e) coordinating Parliamentary business, including analysis of upcoming legislation and amendments and advice on parliamentary procedure;
 - (f) preparing Parliamentary speeches, speech notes, policy briefings, private members bills and amendments, letters and submissions on issues of interest;
 - (g) providing advice to me on emerging policy issues and contribute to policy development, including capitalising on opportunities for Parliamentary action on priority issues;
 - (h) assisting, representing and/or accompanying me as required;
 - (i) developing and executing the media and communications strategy and draft copy for speeches, social media posts, media responses, website copy and constituency newsletter; and
 - (j) all other responsibilities as lawfully directed by me.
23. The position description also made clear that I expected that significant travel would be required for the role, and that the physical requirements of the role necessarily required the successful candidate to have the ability to work extended hours (12+) during Parliamentary sitting weeks and on weekends as required, and the ability to undertake

Mon. 13 - Ek. Cle

office-based activities, including sitting at a desk and using a computer for extended periods.

24. The position description also made clear that in addition to the salary for the role, a Parliamentary Staff Allowance of \$30,205 would be paid in recognition of, and in compensation for, reasonable additional hours of work.
25. The Chief of Staff role can be distilled into three main parts:
 - (a) the Parliamentary aspect (which involves policy advice, analysing and advising on proposed legislation and preparing Parliamentary speeches);
 - (b) the community engagement aspect (which involves engaging with the electorate and providing advice on constituency issues); and
 - (c) the electorate office aspect (which involves coordinating and managing my office, including the electorate officers, volunteers, and any other staff).
26. From my perspective, the community engagement aspect of the role is the most important part of the Chief of Staff role. It is not an afterthought. My office exists to serve the electorate, so engaging with the electorate and understanding their concerns is extremely important and ensures that I am able to genuinely represent the electorate in Parliament.
27. While backbenchers had been allocated four parliamentary staffers under the previous government, this did not mean that I expected my parliamentary staffer to do the jobs of four people. However, I did expect that the Chief of Staff role I designed would likely have a broader role than that held by parliamentary staffers for backbenchers under the previous government, and that their role would incorporate duties that were previously spread across multiple parliamentary staffers under the previous government.
28. I had no expectation that the parliamentary staffer would, or could, do everything.
29. There was support and options for additional staffing assistance available in my office for the parliamentary staffer, including:
 - (a) the four electorate officers;
 - (b) volunteers. There were approximately 2,000 volunteers who worked on my election campaign, many of whom expressed a willingness to do voluntary work for my office.

Mark B. — Ek. Cole

These volunteers would need to be coordinated and managed by the parliamentary staffer; and

- (c) the possibility of me directly employing additional staff members, subject to adequate funds being available from Kooyong Independents Ltd (**Kooyong Independents**), a private company that was established for the purpose of my election campaign. If inadequate funds were available to employ staff, there was the option of having Kooyong Independents carry out fundraising in order to obtain those funds.

Ms Rugg's employment

- 30. I advertised for the position of Chief of Staff from 5 July 2022 to 13 July 2022. The position was advertised on Seek.com, Linkedin and CareerOne. The job advertisement extracted the Position Description that I had developed for the role in full. Now produced and shown to me and marked **MR-2** is a copy of the job advertisement.
- 31. On or around 6 July 2022, Ms Rugg applied for the position of my Chief of Staff. Now produced and shown to me and marked **MR-3** is a copy of Ms Rugg's application.
- 32. Prior to this, I already knew of Ms Rugg due to her experience as an activist. I had also been introduced to her socially at an event on 6 June 2022 at which she told me that she had volunteered on my election campaign. Before she applied for the position as my Chief of Staff, Ms Rugg had been the Executive Director of Change.org Australia and the National Director of Australians for a Murdoch Royal Commission.
- 33. At paragraph 11 of the Rugg Affidavit, Ms Rugg states that she applied for a Media Advisor role in my office. I disagree that Ms Rugg ever applied for a Media Advisor role in my office. I did not contemplate such a role, because as set out above, I was allocated only one parliamentary staffer and I decided that I needed a Chief of Staff. I did not give any indication to her about what roles may be available for my office prior to 24 June 2022, because I had not yet received notice from the Government about staffing allocations.
- 34. At paragraph 17 of the Rugg Affidavit, Ms Rugg states that she was provided with a position description for the Chief of Staff role prior to being offered employment with my office. As stated above, the position description was part of the advertisement for the Chief of Staff role and was available to Ms Rugg before I received her application.
- 35. In the cover letter to application, Ms Rugg said, in part:

Ms R - Ek. Cle

- (a) *"I think the success of this role, measured by your success in your role, will ultimately hinge on the working relationship between you and the successful candidate";*
- (b) *"Your Chief of Staff and your electorate team will be essential to your ability to achieve the commitments you've made to the people of Kooyong";*
- (c) *"As your Chief of Staff, I'd seek a close working relationship built on multifaceted trust. Trust that I'll deliver the work you've asked for and anticipated that which you haven't. Trust that your commitment to transparency, accountability and integrity will be mirrored in the financial operations, procedural compliance and management of your office and staff. Trust that if we encountered conflict or contention that we'd resolve it frankly, quickly and as an investment in our working relationship. Trust in my loyalty as a confidant, an ally and a deeply respectful and definitely-not-patronising personal cheerleader".*

- 36. I deeply agreed, and still agree, with each of those statements. As stated above, I considered the Chief of Staff to be the most critical position in my office. My Chief of Staff needed to be my wing person- and someone who was always there for me and who was across everything that was happening in my office. I needed to have the highest level of trust and confidence in my Chief of Staff.
- 37. From the cover letter, I believed that Ms Rugg understood the importance of the role to my office, and also the significance of a close working relationship built on absolute trust between me and my Chief of Staff.
- 38. I considered Ms Rugg's application. Although I was aware that she had not previously held the role of a Chief of Staff for a politician, I was aware that she had a great deal of experience as a media adviser, advising on policies, developing community movements and engaging the public on political issues. I also believed that she had experience building and managing teams given that she had, in her CV, described managing large teams of staff members and volunteers at Change.org and in national campaigns "including on marriage equality and several election campaigns." On reading the application, I believed that Ms Rugg would be a good fit for me personally and my team, and that she could meet each of the criteria for the role.
- 39. I was encouraged to read in Ms Rugg's application (under the heading "Political Strategy") that she recognised that outside of Parliament House there was a need to prioritise sustaining community engagement from Kooyong constituents. Ms Rugg stated

Ms Rugg - El. Cole

that she was “*brimming with ideas on how to engage Kooyong constituents, via policy work, on social media and in the community*” and I believed that she had recognised the importance of community engagement work to the role.

40. After interviewing Ms Rugg for the Chief of Staff role, I offered her the position on or around 19 July 2022, which she accepted. Ms Rugg signed a contract of employment dated 19 July 2022, which is exhibit SR-2 to the Rugg Affidavit. I offered Ms Rugg a salary of \$136,607 per annum. In addition to her salary, Ms Rugg was paid a Parliamentary Staff Allowance of \$30,205 in accordance with the *Commonwealth Members of Parliament Staff Enterprise Agreement 2020-23 (Agreement)*. The Agreement is attached to the Rugg Affidavit as SR-1.
41. My Rugg started in the role on 25 July 2022, which was the day before the opening of the 47th Parliament of Australia.

Ms Rugg’s work hours and responsibilities

42. In paragraph 19 of the Rugg Affidavit, Ms Rugg states that her role is an amalgam of three or four different roles and that she worked as a Chief of Staff, a Parliamentary and Policy Advisor and a Media Advisor. This is not correct. As stated, Ms Rugg had duties which may have previously been performed by different people in distinct roles in the offices of other crossbench parliamentarians during the previous parliament. However, I designed the Chief of Staff role to incorporate the duties that I needed to be performed. It is not correct that Ms Rugg worked, or was expected to work, in three or four roles. She was expected to perform the role of Chief of Staff, as that role was described in the Position Description.
43. At paragraph 23 of the Rugg Affidavit, Ms Rugg states that she had duties of two additional roles at various times, being the ‘Community Engagement Manager’ and the ‘Digital Engagement Manager’. I disagree. The tasks listed in paragraph 23 of Ms Rugg’s affidavit were tasks that came within Ms Rugg’s role as Chief of Staff.
44. At paragraph 25 of the Rugg Affidavit, Ms Rugg states that she would usually work 70 or 80 hours a week and almost always worked both days of the weekend. She states that she worked 12-hour days (and sometimes longer) during sitting weeks of Parliament, and that she would ordinarily be in the office 8 or 9 hours a day during non-sitting weeks, but often working from very morning and until very late at night.

Ms. B. - E. Cole

45. I disagree with any suggestion that I required or expected Ms Rugg to work that number of hours. I never once gave Ms Rugg a direction that she should work that many hours or that many days per week.
46. I agree that during sitting weeks of Parliament, the working day was very long (typically 12 hours or more) and Ms Rugg was required to work long hours during those weeks. During Parliament sitting weeks, Ms Rugg always came to Canberra with me. I also had one of my electorate officers come to Canberra, as it was not enough to have one parliamentary staffer with me in Canberra during Parliament sitting weeks. Volunteers would also come with us to Canberra on occasion. During the period July to December 2022, there were approximately eight sitting weeks in Parliament, each of which was normally four days long (in total there were 31 sitting days).
47. However, during non-sitting weeks, the hours were not as long and I tried to give my staff, including Ms Rugg, as much flexibility with their hours as I could. Almost all of my staff have family responsibilities and wherever possible I give my staff flexibility to meet those responsibilities. My experience was that Ms Rugg usually arrived at the office at around 9.30 am and left at around 5.00 pm to 5.30 pm. During non-sitting weeks, there was some work that was required after hours, such as scanning the media, taking calls from the media, attending events, and other tasks as required.
48. Ms Rugg was paid the Parliamentary Staff Allowance in recognition of, and as compensation for, those additional hours of work.
49. I agree that there were weeks, including during the sitting weeks of Parliament, where Ms Rugg did work 70-hour weeks. I was concerned, at times, that there was an undue workload on all crossbench staff, particularly those of the 'teal' independents, who were each allocated only one parliamentary staffer. Most, if not all, other crossbench members have been allocated two personal staffers.
50. During non-sitting weeks, I did not see any work output from Ms Rugg that was commensurate with a person who was working 70 to 80 hours a week as she says.
51. As explained above, there were other staff members and resources available to Ms Rugg if she needed assistance for aspects of her role. Managing the team in my office was part of Ms Rugg's role and was one aspect where she fell short. For example, Ms Rugg did not schedule regular meetings with staff and would often defer meetings that had been scheduled. Staff did not have clearly defined roles and often felt rebuffed by

Ms. B. - E. C. C.

Ms Rugg when they offered to take on additional tasks. I believed that as Chief of Staff, Ms Rugg should have put in place more structure and organisation for the team over the course of the working week when we were not in Canberra, and actively attempted to set the strategy and direction of the electorate office. She did not do that.

52. It was up to Ms Rugg to delegate tasks as she considered appropriate and supervise the people to whom she had delegated those tasks. She could have eased the pressure on herself had she delegated appropriately and managed the team effectively. I felt that she did not work efficiently, and there were many tasks she tried to do herself that she should have delegated. We did not take advantage of our very large volunteer base - in fact, many former volunteers felt that they had been pushed away - as she said she would not have capacity to engage with them at any scale before 2023. I also felt that she did not manage the electorate office team well, because she did not ever have regular meetings with people in the office and she did not supervise them effectively or properly manage her direct reports. As a result, the team was not functioning as well as it could have. For example, in December 2022, the staff member designated as my diary manager completed her three-month probationary period with the team. In December 2022, she told me she was concerned she had not yet had a performance management meeting. In the three months she'd been with us, Ms Rugg had not sat down with her and talked to her about her performance prior to the conclusion of her probationary period. I asked Ms Rugg about this, and she said it was my job to do that, not hers.
53. At times, Ms Rugg did say to me words to the effect that she was overloaded or that she could not perform the duties that I expected of her. From early September 2022, she started pushing back on her responsibilities and saying that it was not reasonable for me to expect her to do all of the duties identified in the position description.
54. Those duties were things that needed to be done. I started doing things myself that were clearly within Ms Rugg's position description, for example, updating my website content and writing regular email newsletters. Ms Rugg wrote a few newsletters and then said it was too much for her to do, so I ended up writing them, with technical assistance from another team member on formatting and sending them out. I have read the Affidavit of Ms Rugg affirmed 2 February 2023 (**Second Rugg Affidavit**). I disagree with Ms Rugg's statements at paragraphs 108 and 109 of the Second Rugg Affidavit that she was writing most of the newsletter until about December 2022. That is not accurate. I do recall that

Ms Rugg - El. Ale

Ms Rugg did not send the newsletter that was due to be sent on 25 September 2022. I had an understanding that she would do that newsletter. Ms Rugg did not tell me that she was not going to complete the newsletter or that she was not going to be able to complete it. I found out after the newsletter was meant to be sent that it had not gone out. I also started to do more of my own speech writing; other members of the team were also taking on more of that role.

55. In paragraphs 27 and 28 of the Rugg Affidavit, Ms Rugg discusses the performance of community engagement work in my office and states that she identified that there was no member of staff who was responsible for the management of volunteers and running community engagement projects and events. The community engagement work was part of Ms Rugg's role as Chief of Staff; as stated above, I considered it to be the most important part of her role. I felt that Ms Rugg had no interest in this part of the role and had no interest in my electorate. Ms Rugg would not attend community events with me. It was not "her thing", and she did not have any interest in community engagement. Instead, she was more focussed on, and interested in, the parliamentary aspect of the role. This was a significant issue for me as I believe that my Chief of Staff needs to be engaged in my electorate and with fostering relationships with the citizens of Kooyong.
56. At paragraph 28 of the Rugg Affidavit, Ms Rugg refers to a conversation that we had in September 2022. Ms Rugg told me that she was keen for us to get another person on board to focus on the community engagement work. There were some funds available in Kooyong Independents to engage someone on a part-time basis to assist with this work. If that person was to be engaged on an ongoing basis, then the company would need to raise additional funds to enable that to happen. I suggested to Ms Rugg that she prepare a position description for this role. She did not want to prepare position descriptions, because she said words to the effect that she did not want to have anything to do with Kooyong Independents. While Kooyong Independents would be paying the salary of the person who was to be employed, that person would be working in my office and would fall within Ms Rugg's supervisory remit, so I did not understand her reluctance to prepare a position description. I do not recall Ms Rugg saying that she did not have time to do this work and that if she had to do it, she would need to do it outside of her work hours and that she did not want to do that and could not do that.

Ms. B. - E. Cole

57. At paragraph 29 of the Rugg Affidavit, Ms Rugg discusses a disagreement that she said occurred with me on 25 September 2022, when I had “directed” her to attend a meeting at her house at 6.00 pm on a Sunday evening. I disagree that I had “directed” her to attend a meeting at my house on a Sunday evening. My recollection is that I invited Ms Rugg and one of my electorate officers to my house for dinner on the Sunday evening. Ms Rugg came around and I ordered pizza. I also disagree with the way in which Ms Rugg has described the conversation, including that my tone and facial expressions were very angry and that I presented in a highly accusatory manner. During that conversation:
- (a) I showed Ms Rugg and my other team member a folder that had been prepared for Kate Chaney MP by Ms Chaney’s advisor and said words to the effect of “*this looks great, this is exactly what I need*”;
 - (b) Ms Rugg and the other team member agreed that the folder looked great and that they would start preparing folders like that for me;
 - (c) we talked about a speech that Ms Rugg was preparing on media diversity. I said that I had not yet seen the speech. Ms Rugg said that she had written it and it was on a laptop in her bag. She had not previously told me that finished writing the speech. There was a communication issue because Ms Rugg was not keeping me up to date. I needed to know what had and had not been done before the sitting week started.
58. I deny that there was any hostility in that conversation. The text messages included in Ms Rugg’s affidavit (as annexure SR-4) from later that evening reflect that fact, and this could be independently corroborated by my other staff member who was there that night.
59. In paragraph 31 of the Rugg Affidavit, Ms Rugg refers to an email exchange between us on 30 September 2022. The background to that email exchange was as follows:
- (a) I had drafted the fortnightly electorate newsletter, which, as referred to above, was one of Ms Rugg’s responsibilities as Chief of Staff. Ms Rugg had told me on several occasions that she did not have time to prepare the newsletter and on occasions one had not been sent out at all. On this occasion, I decided to draft the newsletter myself, and I sent it to Ms Rugg and one of my electorate officers by email on 30 September 2022;
 - (b) shortly before sending that email, I realised that it had been two weeks since we had

Ms. B. - E.C. Cole

posted any content to my MP Instagram account. I did not have access to my MP Facebook account, so I did not know how long it had been since we had posted to Facebook either. In my email of 30 September 2022, I said *"It's been 2 weeks since we posted on Insta. I have no vision of the FB so don't know how long it is since we posted on FB. ... I feel like we have really dropped the ball on non-Twitter SM"* (SM being social media). I felt that the team had dropped the ball in relation to social media content and I considered the lack of Instagram posts to be inadequate. My expectation was that we should be posting to our audience on Twitter once a day and posting on Instagram and Facebook every two to three days. Social media is a key communication tool for a significant part of the electorate, and if it is not updated then that communication does not happen;

(c) In response to that email, Ms Rugg said, among other things, *"Mon, we haven't dropped the ball on insta and FB – we are exceptionally short-staffed, and the consequence of this is that we're not able to deliver the volume of work of a full-staffed team (or a fully staffed team with assistance from additional fundraised roles). We don't have a social media manager, we are all doing our very best. ..."* I considered this response to be odd, because we were a fully staffed office. The full staff of the office comprised me, Ms Rugg (as the parliamentary staffer) and four electorate officers, and we had to make do with what we had. From my perspective, it was an organisational issue. No one had been allocated to the job of updating social media and no one was overseeing it (even though this fell within Ms Rugg's remit) and so things were falling through the cracks.

60. In paragraph 32 of the Rugg Affidavit, Ms Rugg refers to a conversation we had on 30 September 2022 about the social media issue. I disagree that I said to Ms Rugg that she was not working hard enough. I also disagree that my tone and facial expressions were cold and angry. I agree with Ms Rugg that it had been a very busy sitting week in Parliament and that we were both exhausted. I did say to Ms Rugg that we were dropping the ball on a number of things. Ms Rugg said to me words to the effect of *"we'll continue to do so because we are so short staffed"*. I began to lose confidence in Ms Rugg when she said that. I believed that we had sufficient resources available to assist with the posting on my social media accounts, and that Ms Rugg was responsible for drawing on those resources and putting in place systems and strategies to ensure that the work was completed efficiently.

61. At paragraph 36 of the Rugg Affidavit, Ms Rugg refers to me missing a speaking spot in

Mon. R. - El. Cole

Parliament on 7 November 2022. Parliamentary speaking spots are worth their weight in gold. That day, I had two speeches on two different bills. Ms Rugg had initially moved me from one of them because she thought they were going to clash. Regardless of Ms Rugg's attempts to move my spot, the speaking spots did ultimately clash and while I was giving one speech in one chamber, I lost my opportunity to speak in the other and it was not possible to move me again. I had spent some hours working on the speech I was unable to give. Ms Rugg and my other electorate officer who was in Canberra that week both went to a briefing. Rather than both going to that briefing, one of them should have been in my office watching the two chambers and, when they saw there was going to be a direct clash, they should have told me so that we could have facilitated an opportunity to swap with enough time to spare. That opportunity was missed because they were both at the same briefing. Ms Rugg should have taken charge and her first priority should have been making sure I did not miss the speaking opportunity, however, Ms Rugg wanted to be in the briefings. I was upset to miss the speaking spot, but I deny that I was "furious".

62. At paragraph 37 of the Rugg Affidavit, Ms Rugg refers to a conversation about a speech on the Government's industrial relations (**IR**) bill. I had written two speeches for the day before, on native forest logging and the pension bill (although I did not get to give my speech on the pension bill). We had discussed on or around the 7th of November that that, because I was writing those two speeches, Ms Rugg would write the speech on the IR bill. We discussed the matter again on 8 November 2022, and Ms Rugg said that I was writing the IR bill speech. I said "*no, you're writing that one*". I do not recall whether or not I gave an exasperated laugh during that conversation or looked at the other MPs that we were with.
63. I reject what Ms Rugg has said about ongoing hostility at paragraphs 38 and 39 of the Rugg Affidavit. I deny that I subjected Ms Rugg to any hostile or inappropriate behaviour during our working relationship.
64. I do not recall Ms Rugg ever saying to me that she could or would not work certain hours or that she was refusing to work certain hours, including that she was refusing to work unreasonable additional hours. The only time that I can recall Ms Rugg raising a concern about working outside of ordinary hours was on Sunday, 27 November 2022 when she told me that I should not have asked to meet with staff that morning and should have called a meeting for later in the day. At that time, I understood the concern to be raised on behalf of other staff, and not on Ms Rugg's own behalf.

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65. At paragraphs 85 to 101 of the Second Affidavit and paragraphs 128 to 131 of the Second Rugg Affidavit, Ms Rugg describes events that I had no expectation that she would attend. I invited my staff members to those events but I was not requiring or expecting my staff, including Ms Rugg to attend. It was no big deal that Ms Rugg elected not to join me for those events.
66. I never understood at any time during Ms Rugg's employment that she was refusing to work additional hours because they were not reasonable.
67. I have been informed that under clause 33.4 of the Agreement, a personal employee may choose not to receive a Parliamentary Staff Allowance where the employee is unable to, or does not expect to work significant additional hours of work. The clause gives the example that the option may be taken up by an employee who does not frequently work additional hours for personal or family reasons.
68. Ms Rugg never said to me that would like to choose not to receive the Parliamentary Staff Allowance, and to the best of my knowledge she did in fact receive it.

Concerns regarding Ms Rugg's performance

69. In around November 2022 it had become clear to me that Ms Rugg was not doing the job that I needed her to do.
70. Ms Rugg loved going to Canberra. She was previously an advocate for various causes, and in my view she enjoys being involved with the media and being "where it's all happening". However, my impression of her was that she was not interested in engaging with my electorate and would regularly say to me that "it wasn't part of her role". Engaging with my electorate was the most important part of her job for me.
71. I was concerned that Ms Rugg was not developing and executing key strategies such as a community engagement strategy, that my official website had not been kept up to date, that there had been limited engagement with my constituents, that Ms Rugg had not developed a detailed budget, and that Ms Rugg was not appropriately supervising staff.
72. I spoke with Ms Rugg about her performance in the role on 15 November 2022. We discussed that she had not had an end of probation review. She requested a formal performance review; I agreed. I asked her to check with Ministerial and Parliamentary Services (**MAPS**), what that would require, and to schedule it in the following weeks. I do not agree that I was angry or frustrated with Ms Rugg. I do not believe that there was any tension between us at that time at all.

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73. I deny that after 15 November 2022 I started to ignore Ms Rugg or exclude her. I deny that I 'snubbed' Ms Rugg on 20 November 2022 as she says at paragraph 46 of the Rugg Affidavit, and I deny that I did not acknowledge her on that occasion- we were undertaking a charity walk with other MPs, who could (if required) verify that that was not the case.
74. Ms Rugg had told me on several occasions, including during our discussion on 15 November 2022, that she was overloaded and couldn't keep up with everything.

Formal warning

75. On 22 November 2022, while we were in Canberra for a parliamentary sitting week, Ms Rugg told me that she had tested positive for COVID-19.
76. We discussed that Ms Rugg could not remain in the office while COVID positive, and I asked what she planned to do. Ms Rugg was not sure whether she would stay in Canberra while she recovered. She usually stayed with a friend when in Canberra for sitting weeks, but she said to me that she was not sure whether it was appropriate to stay with a friend while she isolated. We discussed that she might rent a car and return to Melbourne. I said that she should take care if renting a car, so as to limit the risk of transmitting COVID-19 to any of the car rental staff.
77. Later that afternoon, I received a text message from Ms Rugg which said that she was on an aeroplane home, that she could not face the drive or hotel isolation, and that she figured that half the plane could be COVID positive with or without her on it.
78. I was very disappointed to receive that text message from Ms Rugg and to learn that she had intentionally caught an aeroplane knowing that she was COVID positive.
79. At the time, I believed that it was illegal to travel on a plane with COVID-19. Even if it was not illegal, I thought it was extremely irresponsible and, morally, the wrong thing to do to given that it had the potential to place other people's health at risk. I have been a big advocate for COVID safety, publicly and privately, including b in Parliament. My primary concern with Ms Rugg travelling on an aeroplane while COVID positive was that I thought it was morally wrong, and it suggested that Ms Rugg and I were not at all aligned on an issue that was very important to me. I also felt that if anyone found out that my Chief of Staff had travelled on a plane immediately after testing positive for

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COVID, it would be a huge reputational issue for me and the rest of our team. I believed that if the media knew what Ms Rugg had done, it would be a real problem. It would look like I was condoning that sort of behaviour, when that was in no way the case.

80. Both of those concerns significantly undermined my trust in Ms Rugg. To me, they demonstrated a disregard for the rest of the team. We work together, and we succeed together or we do not. I have loyalty to everyone in my team. What we do reflects on each other and- most importantly - on the people of Kooyong. For Ms Rugg to knowingly get on a plane with COVID seemed a wilfully selfish thing to do.
81. I replied to Ms Rugg's text message saying that I wished she had told me that she was considering doing that, and that I could not advise anyone that it was an appropriate thing to do.
82. Now produced and shown to me and marked "MR-4" is a copy of my text messages with Ms Rugg on 22 November 2022.
83. The week after testing positive to COVID-19, Ms Rugg isolated at home. However, on or about 23 November 2022, Ms Rugg told me that she was working from home and so I believed that she was working as usual that week. She did not tell me that she was too unwell for work. If she had done so, I would have told her to take personal leave while she recovered and would have made arrangements for other staff to cover her work.
84. The week of 28 November 2022 was another sitting week in Parliament. In the morning of Sunday 27 November 2022, I had not received any information about which volunteers were coming to Canberra, or who was preparing which speeches for that week. We also needed to take things up to the Canberra office and there was no plan for who was going to do that; I was hoping some volunteers who were driving up could take that luggage. I would have expected those details to be organised at a team meeting at the end of the previous week, but that had not occurred. As Chief of Staff, it was Ms Rugg's responsibility to coordinate that. I sent a message to the team and asked if we could have a meeting to discuss plans for the week at 9am. Ms Rugg sent me a text message saying that the meeting should happen later in the morning at a more family-friendly hour. I know, from speaking to my other staff, that they were not concerned that I called the meeting or my planned timing for the meeting.
85. Ms Rugg returned to working in the office on 30 November 2022, flying up to Canberra for what was at that point expected to be the last 2 sitting days of the year.
86. Because of my concerns about Ms Rugg travelling while COVID positive, as described

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above, I decided to give Ms Rugg a written warning. I discussed my concerns with Ms Rugg verbally on 6 December 2022. This was the first time I had seen her back in the electorate office since she had tested positive to COVID. Ms Rugg did not accept the seriousness of what she had done. She told me that she had a letter from her general practitioner that said she should get on a plane to return home. She did not provide a copy of that letter to me. As an experienced medical practitioner, I did not believe that any general practitioner would give Ms Rugg that advice. It was very problematic for me that Ms Rugg did not seem to understand or accept why I was concerned about her conduct. This undermined my trust in her judgement. The following day I provided Ms Rugg with a written warning. Now produced and shown to me and marked "MR-5" is a copy of the written warning.

87. My sole reason for providing the written warning to Ms Rugg were my concerns that:
- (a) Her conduct had placed the public at risk; and
 - (b) There was a real and significant risk to our team of Ms Rugg travelling by plane while knowing she had COVID.
88. I did not provide the warning to Ms Rugg for any other reason, and I deny that I provided Ms Rugg with a warning because of, or for reasons that included the fact that she had:
- (a) exercised a workplace right under s 62(2) of the FW Act to refuse to work additional hours that were unreasonable;
 - (b) proposed to exercise a workplace right by continuing to exercise a right under s 62(2) of the FW Act to refuse to work additional hours that were unreasonable;
 - (c) exercised a workplace right by refusing to work additional hours that were not reasonable, being a workplace right arising from her entitlement to the benefit of a workplace instrument, namely cll 31 and 32 of the Agreement;
 - (d) proposed to exercise a workplace right by continuing to exercise the right under cll 31 and 32 of the Agreement to refuse to work additional hours that were not reasonable;
 - (e) exercised a workplace right by refusing to work additional hours that were not reasonable, pursuant to cl 4 of her contract of employment (which contract is made under the *Members of Parliament (Staff) Act 1982* (Cth) (**the MOPS Act**);

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- (f) exercised a workplace right to make complaints and inquiries in relation to her employment.

Events in December 2022

89. At paragraph 49 of the Rugg Affidavit, Ms Rugg refers to discussions about the Voice referendum. One of my electorate officers had expressed an interest in taking the lead for our team on the Voice campaign. Ms Rugg offered to brief the crossbench on what she had learned from the Marriage Equality campaign. Ms Rugg had had a very prominent role in the Marriage Equality campaign. I believe that paragraph 49 of the Rugg Affidavit conflates Ms Rugg's offer to brief the crossbench with taking the lead on the Voice campaign. We had not discussed that Ms Rugg would take the lead. I did not want Ms Rugg spending time on briefing crossbenchers about campaigns. I did not need Ms Rugg to upskill other crossbenchers. I wanted her to do her work for me and concentrate on her job.
90. At paragraph 50 of the Rugg Affidavit, Ms Rugg states that she had done a lot of work on native forests. I do not agree. My understanding is that Ms Rugg had not done any work on native forests.
91. I do not agree with Ms Rugg's comments at paragraph 51 of the Rugg Affidavit that around this time I was "freezing" her out of decisions. I deny freezing her out at all. I was trying to decrease her workload because she had told me that she had too much to do and could not keep up with everything.
92. On 7 December 2022, I went on an impromptu shopping trip with two of my electorate office staff. We left the electorate office at about 9.45 am. Ms Rugg refers to that shopping trip at paragraph 56 of the Rugg Affidavit. It was an off the cuff decision to go shopping. Those two electorate office staff chose to come shopping with me, and the other two did not. Ms Rugg was not in the office when we left to go shopping as she had not yet arrived at the office for the day. This is why we did not invite her to come with us. There was no deliberate decision not to invite Ms Rugg shopping.
93. After we returned from the shopping trip, Ms Rugg did not speak to me or the other staff members who had come shopping with me. I felt that there was noticeable tension between Ms Rugg and everyone else in the office from that point, and that the tension was stressful for all staff in the office.

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94. On 8 December 2022 I had a 'getting to know you' coffee with Senator Janet Rice. It was not a working meeting, just a coffee. I did not know that Ms Rugg had a previous working relationship with Senator Rice. I deny that it was unusual for Ms Rugg to not attend this coffee with me, as she suggests at paragraph 59 of the Rugg Affidavit. I'd previously had lunch or a coffee with several upper and lower house Members of the State and Federal Parliaments without Ms Rugg accompanying me.
95. From 8 December 2022 to 16 December 2022, Ms Rugg was absent from the workplace on stress leave. Ms Rugg sent me an email on 8 December 2022 in which she stated that her doctor had recommended that she take stress leave from work until Friday 16 December 2022. Ms Rugg said that while on leave she would like to be kept in the loop with next steps regarding her performance review, and that she would like to come off leave to participate in the review if it could be scheduled for the week of 11 December – 16 December 2022. Now produced and shown to me and marked "**MR-6**" is a copy of Ms Rugg's email to me dated 8 December 2022.
96. The following day, I emailed Ms Rugg to advise that her performance review had been scheduled for 11:00 am the following Monday, being 12 December 2022. I had arranged for the performance review to be organised because I had understood from Ms Rugg's email the previous day that she wanted the performance review to occur as soon as possible and that she did not want it to be delayed due to her sick leave. I do not understand why Ms Rugg says at paragraph 62 of the Rugg Affidavit that she felt she "needed to attend" or why she says at paragraph 64 of the Rugg Affidavit that she attended the performance review meeting even though she was on sick leave because she felt that if she did not attend there would be "trouble". I never forced Ms Rugg to come in to attend her performance review, nor did I direct her to do so. Ms Rugg had specifically told me that she would like to come off leave to participate in a review if it could be organised.
97. The performance review meeting went ahead as scheduled. I do not agree that I said to Ms Rugg in that meeting, as stated at paragraph 64 of the Rugg Affidavit, that Ms Rugg could resign, and I might consider re-employing her casually or she could go on a performance improvement plan. There would be no way to do that under the electorate staffing model set out by the government. What I did say was that I thought the role of Chief of Staff was not the right one for her. I thought she was better suited to a media or

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policy adviser role, and that it might be worth us considering rejigging things so that she had a role that played to her strengths. I did not think her interest in the community engagement part of the Chief of Staff role was sufficient.

98. I offered her a media or policy adviser role and she asked if she would still have the title Chief of Staff and the same salary. I said no, that would not be possible because of the staffing allocation, but I thought maybe with the money from Kooyong Independents, I could rejig things and employ her in a different role. I did say that another option was that I put her on a performance improvement plan. Ministerial and Parliamentary Services (**MAPS**), who were giving me advice on the process, had told me at that time I could dismiss Ms Rugg or put her on a performance review plan. I agree that I specifically said to Ms Rugg that I was not terminating her employment.
99. Ms Rugg returned to the office on 19 December 2022. It was a difficult day. There was noticeable tension. I deny the statement at paragraph 66 of the Rugg Affidavit that I did not speak to Ms Rugg directly during the day. I did speak to Ms Rugg. She gave a brief presentation as part of the strategy session we had that day, and there were some factual errors in her presentation. The presentation was made to all of my team and a few volunteers who were helping out. I do not think I displayed forceful disagreement with any comments made by Ms Rugg, and I did not "scowl" at her.
100. On 20 December 2022, I sent Ms Rugg a copy of a proposed performance improvement plan (**PIP**), as had been discussed with her on 11 December 2022. The PIP was prepared by MAPS, not by me. I do not agree that the demands of the PIP were objectively impossible. Now produced and shown to me and marked "**MR-7**" is a copy of the PIP.
101. On 20 and 21 December 2022 Ms Rugg and I exchanged email correspondence about the PIP. That correspondence is attached to the Rugg Affidavit as annexure SR-13.
102. On 21 December 2022, I discussed the PIP with Ms Rugg. The discussion as recorded at paragraph 71 of the Rugg Affidavit is fairly accurate to the best of my recollection. The crux of the discussion was that I said to Ms Rugg that the two options open to me were to terminate her employment, which MAPS had advised me that I could do, or to place her on the PIP. I said that the PIP option would take months and that the primary problem was that Ms Rugg was not interested in doing the community engagement work that was an integral part of her role, and I could not see how a PIP was going to change

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that. There was a fundamental disagreement in what I wanted, expected and needed from Ms Rugg, and what she was prepared to do. I felt that she wanted the job, but only on her terms. I offered Ms Rugg the option that she could resign and said that if she chose to resign, she would receive six weeks' pay, but would not need to return to the office or work after 21 December 2022. She could take 5 or 6 weeks off and get another job. I said that we could both spin it how we wanted, and that I would say that her employment with me "just wasn't a good fit". I suggested she go home to talk about it with her partner. I thought it was an option that might work quite well for us both, and we could have an amicable separation. However, it was her option if she wanted it and it was completely up to her. I had not made any decision at all at that stage to terminate Ms Rugg's employment. I deny saying to Ms Rugg that I had made up my mind to terminate her employment in January.

103. Ms Rugg asked me to put what I had said in writing. I could not see the point of that. I explained that MAPS had said that I could terminate Ms Rugg but that I did not want to do that, and that MAPS had not given me the option of resignation with pay, but it seemed a reasonable way of resolving the situation. I also said that it was still open to her to pursue the PIP option.
104. I deny that I ever said the words attributed to me in paragraph 79(n) of the Rugg Affidavit. I deny that in that conversation Ms Rugg said to me "*what do you need from me*" and I said "*your resignation*".
105. My actions in developing the PIP and offering the option for Ms Rugg to resign were solely motivated by my concerns that Ms Rugg was not doing the role that I needed her to perform, and specifically that she was not, and would not, perform the community engagement work or staff management work that I required. It was not for any other reason. I deny that I developed the PIP and/or offered Ms Rugg the option to resign because of, or for reasons that included the fact that Ms Rugg had:
 - (a) exercised a workplace right under s 62(2) of the FW Act to refuse to work additional hours that were unreasonable;
 - (b) proposed to exercise a workplace right by continuing to exercise a right under s 62(2) of the FW Act to refuse to work additional hours that were unreasonable;
 - (c) exercised a workplace right by refusing to work additional hours that were not reasonable, being a workplace right arising from her entitlement to the benefit of a workplace instrument, namely cll 31 and 32 of the Agreement;

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- (d) proposed to exercise a workplace right by continuing to exercise the right under cl 31 and 32 of the Agreement to refuse to work additional hours that were not reasonable;
- (e) exercised a workplace right by refusing to work additional hours that were not reasonable, pursuant to cl 4 of her contract of employment (which contract is made under the *Members of Parliament (Staff) Act 1982* (Cth) (**the MOPS Act**);
- (f) exercised a workplace right to make complaints and inquiries in relation to her employment.

Communication with Ms Rugg after 21 December 2022

- 106. On 21 December 2022, I received Ms Rugg's resignation letter. In that letter, she expressed her wish to resign effective immediately.
- 107. When an employee resigns, I am required to enter in the date of resignation onto the Commonwealth's data base so that human resources and payroll can calculate the appropriate pay and entitlements to be paid to a departing employee. After I received Ms Rugg's letter of resignation, I entered her resignation date into the parliamentary system as 23 December 2022.
- 108. I then spoke to Samirah Siddique, an advisor at MAPS, and Ms Siddique told me that the 23 December 2022 termination date was wrong and that I had to put in Ms Rugg's last day of employment as 31 January 2023, so that Ms Rugg would get all of her entitlements. On that advice from MAPS, I went back into the system and entered Ms Rugg's termination date as 31 January 2023.
- 109. After speaking with MAPS, I sent an email to Ms Rugg on 22 December 2022, acknowledging and confirming Ms Rugg's resignation. I advised her that I had submitted her termination paperwork and had indicated to MAPS that Ms Rugg's final day of employment would be 31 January 2023, but that I did not anticipate that she would work in the office in that period. That email is annexure SR-17 to the Rugg Affidavit.
- 110. On 4 January 2023, one of my staff members called me and said that Ms Rugg had not forwarded any emails to us, and that Ms Rugg was likely still receiving emails relevant to our work. I telephoned Ms Rugg, who claimed that she had received no emails in the preceding 2 weeks. I asked her to set up automatic forwarding on her work email account so that all emails she received would automatically be forwarded to the joint electoral office address. I sent an email to Ms Rugg to her personal email address

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following that telephone call, requesting that she set up the automatic forward. I also asked about arrangements for Ms Rugg to collect her personal items from the office. Ms Rugg responded to that email later on 4 January 2023, and said that she would set up an automatic forward to the office inbox, advised that she would have her work laptop couriered to the office, and requested that arrangements be made to return her personal items to her. Ms Rugg stated in that email: *"Please don't contact me by phone again – you can reach me at this email address"*. Now produced and shown to me and marked **"MR-8"** is a copy of our email correspondence exchanged on 4 January 2023.

111. I took Ms Rugg's request that I not call her again as an indication that she did not want to do any further work for me.
112. On 5 January 2023 at 2:11pm, Ms Rugg forwarded an email to me that she had received earlier that day. The email was from a journalist and had requested a comment from me by 2:00 pm that day. I was concerned that Ms Rugg had not set up an auto forward for her email as I had requested. I responded to Ms Rugg's email on 5 January 2023, and pointed out that she had forwarded the journalist's email after the deadline for reply and asked again that she set up an automatic forward as requested. Ms Rugg did not respond to my email. Now produced and shown to me and marked **"MR-9"** is a copy of our email correspondence exchanged on 5 January 2023.
113. Because Ms Rugg had not set up the auto forwarding when requested and had not provided any further response to my email, I contacted the parliamentary IT services and asked them to set up the email forwarding so that I could be sure that my team received and actioned all relevant emails.
114. Ms Rugg returned her work laptop to the office on or around 9 January 2023. I closed her work email account.
115. On 10 January 2023, I sent a further email to Ms Rugg in which I advised her that I expected that some members of the media would start to ask about her no longer being with the team, and to let her know, as a courtesy, that I had organised an Acting Chief of Staff to join the team from 1 February 2023.
116. In response to that email, on 12 January 2023, Ms Rugg sent me an email which said (omitting formalities): *"It's up to you if you choose to speak to media about my departure-*

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I don't have any control over that. I suggest you don't say anything defamatory, or anything untrue that would force me to correct the record. From my end, there is nothing to discuss further."

117. Now produced and shown to me and marked "**MR-10**" is a copy of Ms Rugg's email to me dated 12 January 2023.
118. I interpreted the 12 January 2023 email as Ms Rugg stating that she did not wish to have any further communications or discussions with me whatsoever.
119. At paragraph 80 of Ms Rugg's affidavit she states that she would have performed any work required of her in this period had it been allocated to her. I find it very difficult to reconcile that statement with the fact that Ms Rugg did not comply with the one request that I made of her during that period (that she set up an auto forward on her email address), that she requested that I not telephone her again, and that said to me that she had nothing further to discuss with me.
120. I have had no further communication with Ms Rugg since 12 January 2023.
121. On 25 January 2023, I received an email from Ms Rugg's legal representatives which contested Ms Rugg's resignation and advised of her intention to file legal proceedings. I was extremely surprised to receive that correspondence as Ms Rugg had not given me any indication that she wanted to rescind her resignation or otherwise remain working in my office. Instead, based on our email correspondence on 5 January 2023 and 12 January 2023, I was under the impression that Ms Rugg did not want to have any further contact with me.
122. I deny that I made any decision to dismiss the Applicant on 21 December 2022 or at any other time.
123. I deny that I have taken any action, or participated in any action, at any stage involving Ms Rugg because of, or for reasons that included the fact that Ms Rugg had:
 - (a) exercised a workplace right under s 62(2) of the FW Act to refuse to work additional hours that were unreasonable;
 - (b) proposed to exercise a workplace right by continuing to exercise a right under s 62(2) of the FW Act to refuse to work additional hours that were unreasonable;

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- (c) exercised a workplace right by refusing to work additional hours that were not reasonable, being a workplace right arising from her entitlement to the benefit of a workplace instrument, namely cll 31 and 32 of the Agreement;
- (d) proposed to exercise a workplace right by continuing to exercise the right under cll 31 and 32 of the Agreement to refuse to work additional hours that were not reasonable;
- (e) exercised a workplace right by refusing to work additional hours that were not reasonable, pursuant to cl 4 of her contract of employment (which contract is made under the *Members of Parliament (Staff) Act 1982* (Cth) (**the MOPS Act**);
- (f) exercised a workplace right to make complaints and inquiries in relation to her employment.

Prospect of Ms Rugg's continued employment

- 124. I understand that in bringing these proceedings, Ms Rugg is seeking to continue working as my Chief of Staff. I do not see how that could possibly work in practice.
- 125. I need my Chief of Staff to be loyal, trustworthy and dependable. I spend a lot of time working very closely with my Chief of Staff, so it is extremely important that we get along well, that we trust each other, and that I have confidence in them.
- 126. Ms Rugg recognises at paragraph 82 of her affidavit that an MP needs to be able to trust the integrity and confidentiality of their chief of staff and have confidence in their ability to perform tasks well and quickly. I agree. Trust and confidence is integral to the role. I no longer have that trust and confidence in Ms Rugg, and I could not work with her again.
- 127. My trust in Ms Rugg began to erode in November 2022 when Ms Rugg placed members of the public at risk by choosing to fly from Canberra to Melbourne, knowing that she was positive to COVID-19. I was also very concerned that Ms Rugg did not seem to understand or accept the seriousness of her conduct or the basis for my concerns. At that time, I believed that my relationship with Ms Rugg was salvageable. I no longer believe that.
- 128. Based on my interactions with Ms Rugg in December 2022 and January 2023, particularly her request on 4 January 2023 that I not contact her by telephone again, and the allegations made by Ms Rugg about me in these proceedings, I believe that our relationship is irreparable.
- 129. Ms Rugg states at paragraph 83 of the Rugg Affidavit that she is confident that she could

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continue to work with me. I do not understand how she could believe that when less than a month ago she was not willing to even speak to me, and wanted all further correspondence with me to be in writing.

130. I do not have the trust and confidence in Ms Rugg's ability to perform the work that I require her to perform. I believe that Ms Rugg's skillset was not what was needed for the role of Chief of Staff. She had the skillset for the role of policy adviser or media adviser, but not Chief of Staff. I believe that her skillset was lacking in terms of her ability to manage and administer the team, engage with the community, and strategize about what was needed to deliver for the people in Kooyong. She does not have the skillset that I need in terms of her ability to manage a team or in developing a community engagement strategy in Kooyong, both of which I view as integral components of the Chief of Staff role. I believe that she does not have the ability to do that work, and that she could not or would not perform those critical aspects of the role to the required standard if she continued in employment in my office.
131. Ms Rugg's description of her duties in the Rugg Affidavit only serves to reinforce my view that she fundamentally misunderstands the importance of the community engagement component of the Chief of Staff role and is unwilling to perform it.
132. Ms Rugg states at paragraph 87 of the Rugg affidavit that if her employment were to terminate after such a short period of time, it would cause irreparable harm to her professional, public and personal reputation. I do not accept that, in and of itself, Ms Rugg's employment coming to an end would cause any harm to her reputation. My intent in suggesting a mutual separation to Ms Rugg on 21 December 2022 was that it would facilitate a graceful exit from her employment with my office for both of us, and allow Ms Rugg to leave the role and be paid six weeks' additional pay. If these proceedings had not been commenced, that would have been the outcome. Any harm to Ms Rugg's reputation has been caused by these proceedings and the high level of media attention that they have already received.
133. I believe that if Ms Rugg were to continue in her role of Chief of Staff, it would adversely affect the morale of other staff in my office. I believe that my team would not be able to work with Ms Rugg again. They have read Exhibit SR-15 to the Rugg Affidavit, which is Ms Rugg's assessment of her performance in the role. They dispute much of the content in terms of who has completed what work in our office in recent months. I believe that my staff have lost the confidence that they had in Ms Rugg. Leaving aside my concerns

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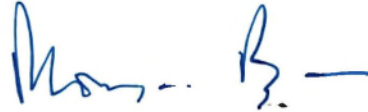
about Ms Rugg's ability to perform the people management aspect of the Chief of Staff role, I believe that it would be impossible for Ms Rugg to manage staff in circumstances where they have lost confidence in her.

134. For those reasons, I believe that it would be impractical, if not impossible, to have Ms Rugg return to the role of Chief of Staff.
135. I have been advised that one possible outcome of Ms Rugg's injunction application is that the Court may order that she continues on in her employment until a final hearing of the matter (and would continue to be paid her salary by the Commonwealth), but that the Court could order that Ms Rugg continues to be absent from the workplace and not be required to perform any duties of the Chief of Staff role during that period.
136. If that were to occur, that would mean that taxpayer dollars are going to an employee that cannot perform work for the electorate that she serves.
137. I believe that if Ms Rugg continues in her employment, that will effectively exhaust my parliamentary staffer allocation. This will have the effect that I would not be able to employ an alternative Chief of Staff to work for me in my office.
138. That support is critical to me. I have effectively had no-one performing the role of my Chief of Staff since at least 22 December 2022. It is extremely difficult for me and my office to deliver on our commitments without that additional staff member. The lack of a parliamentary staffer will significantly impede my parliamentary work when parliament resumes sitting on 6 February 2023. Now produced and shown to me and marked "**MR-11**" is a copy of the parliamentary sittings calendar for 2023, which shows upcoming sitting days for the House of Representatives on 6 – 16 February 2023, 6 – 9 March 2023, and 20 – 30 March 2023.
139. In anticipation of Ms Rugg ceasing employment on 31 January 2023, and in advance of the commencement of these proceedings (and in circumstances where Ms Rugg had not indicated to me in any way that she did not wish to resign or had changed her mind about resigning), I had organised an Acting Chief of Staff to step into the role. If any injunction is granted, that will effectively preclude me from engaging an Acting Chief of Staff and will hamper my ability to serve the people of Kooyong.

Mr. B. - E. Cole

Affirmed by the deponent
at Melbourne
in Victoria
on 2 February 2023
Before me:

)
)
)
)
)



Signature of deponent



Signature of witness

Elizabeth Ann Cole of 80 Collins Street, Melbourne VIC 3000
An Australian Legal Practitioner within the meaning of the Legal Professional Uniform Law
(Victoria)

The affidavit, as signed and notated by the authorised affidavit taker, was signed or initialled by the deponent by electronic means. Administering the affirmation and witnessing the deponent affix her signature/initial to each page were done by means of audio link or audio-visual link. The affidavit is an electronic copy, not an original.

Federal Court of Australia
 District Registry: Victoria
 Division: Fair Work

Sally Rugg

Applicant

The Commonwealth of Australia and another

Respondents

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "**MR-1**" now produced and shown to Dr Monique Ryan MP at the time of affirming her affidavit on 2 February 2023

Before me:



 Signature of person taking affidavit

Annexure "MR-1"

Filed on behalf of (name & role of party)	The Second Respondent		
Prepared by (name of person/lawyer)	Rick Catanzariti		
Law firm (if applicable)	DLA Piper Australia		
Tel	03 9274 5810	Fax	03 9274 5111
Email	rick.catanzariti@dlapiper.com		
Address for service (include state and postcode)	80 Collins St, Melbourne VIC 3000		



24 JUN 2022

PRIME MINISTER

Dr Monique Ryan MP
Member for Kooyong
Parliament House
CANBERRA ACT 2600

Dear Dr Ryan *Monique,*

Congratulations on your election to the House of Representatives. I write to advise you of the following personal staffing allocation to take effect on 1 July 2022 for the duration of the 47th Parliament.

All senators and members are entitled to four electorate officers, with some members entitled to additional electorate officers if their electorate is larger than 25,000km². In addition to electorate staff, under sections 12 and 13 of the *Members of Parliament (Staff) Act 1984* (the MoPS Act), I may determine that a senator or member ought to be empowered to employ staff in accordance with arrangements approved by me.

In recognition of your role as an independent member (i.e. not a member of the Government, Opposition or the Australian Greens), I propose to allocate you one additional full-time staff member at the Adviser classification, in addition to your four electorate staff.

The Parliamentary Library can assist all members and senators with information and advice, including research and analysis of legislation. My Government intends to increase resourcing to the Parliamentary Library to reflect the support role that it provides to parliamentarians, particularly those on the crossbench.

The Clerk of the House and officers of the Department of the House of Representatives are also available to you for advice on parliamentary procedure and to provide assistance with drafting private members' bills.

The Department of Finance will provide the necessary administrative support for the employment of your personal staff member.

A copy of this letter has been sent to the Special Minister of State, Senator the Hon Don Farrell, for information.

Yours sincerely

ANTHONY ALBANESE

No. VID44 of 2023

Federal Court of Australia
 District Registry: Victoria
 Division: Fair Work

Sally Rugg

Applicant

The Commonwealth of Australia and another

Respondents

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "**MR-2**" now produced and shown to Dr Monique Ryan MP at the time of affirming her affidavit on 2 February 2023

Before me:



Signature of person taking affidavit

Annexure "MR-2"

Filed on behalf of (name & role of party)	The Second Respondent		
Prepared by (name of person/lawyer)	Rick Catanzariti		
Law firm (if applicable)	DLA Piper Australia		
Tel	03 9274 5810	Fax	03 9274 5111
Email	rick.catanzariti@dlapiper.com		
Address for service (include state and postcode)	80 Collins St, Melbourne VIC 3000		

[Version 3 form approved 02/05/2019]

[← Back](#)[Print job !\[\]\(cbe2492b119e39e02a1dab2af4a4b296_img.jpg\)](#)**M****Expired**

Monique Ryan MP – Chief of Staff (Adviser Classification)

Ministerial and Parliamentary Services

All Melbourne VIC

Base pay **\$97k - \$137k****Permanent****Full time**

Feedback



Full job description

Applications are invited for the above ongoing position based in Melbourne.

In 2022 Monique Ryan MP created political history by becoming the first Independent and first woman to represent Kooyong, a seat which has been held by the Liberals since WWII. This is an exciting opportunity to be part of the team of Monique Ryan MP, working with Monique to bring about change on the issues that matter to Kooyong – especially urgent climate change action, integrity in government, and respect and true equality for women.

The Office of Monique Ryan MP embraces the values of respect, trust, courage, integrity, inclusiveness and optimism. Behaviours promoted in the office include engaging in positive action, acting in the best interests of Kooyong and its community, being welcoming and inclusive of all, and demonstrating honest and decent behaviour.

All employees are expected to sign a confidentiality agreement and code of conduct prior to the commencement of their employment.

JOB DESCRIPTION

The Chief of Staff (CoS) to Monique Ryan is an exciting, demanding, fast-paced senior

 **This job has expired**



The CoS will build and manage a high performing team of electorate staff to ensure that the team works strategically and collaboratively to deliver for the people of Kooyong.

The CoS role will provide expert and timely advice to the Member on complex and sensitive parliamentary, legislative, policy and political issues and will advise and support the Member in a wide variety of meetings, consultations and negotiations.

The CoS will also be responsible for the development and execution of a media and communications strategy for the Member, and will be responsible for drafting media responses, speeches, social media posts, website copy and constituency newsletters. The CoS will develop strong working relationships with local and national journalists.

Feedback



The Chief of Staff is an employee of the Parliament of Australia. The position is directly accountable to the MP, and works closely with the MP and the Manager of the Electorate Office. The role requires versatility, flexibility, the ability to work to very tight deadlines, loyalty and confidentiality.

The duties of the position include:

1. Build and manage a high performing team of paid and volunteer staff, including position descriptions, and professional development.
2. Formulate strategy for the MP's engagement with government, the electorate and key stakeholders, including identifying the aims, objectives, strategies, responsibilities, timelines, performance indicators and resources required to achieve the MP's goals.
3. Prepare and present a yearly budget for the Member's approval, across all activities.
4. Provide expert and timely advice to the Member on parliamentary, legislative, policy, political and constituency issues.
5. Coordinate Parliamentary business, including analysis of upcoming legislation and amendments and advice on parliamentary procedure.
6. Prepare Parliamentary speeches, speech notes, policy briefings, private members bills and amendments, letters and submissions on issues of interest.
7. Provide advice to MP on emerging policy issues and contribute to policy development, including capitalising on opportunities for Parliamentary action on priority issues.
8. Assist, represent and/or accompany the MP as required.
9. Develop and execute the media and communications strategy and draft copy for speeches, social media posts, media responses, website copy and constituency newsletter

 This job has expired



- sciences, public policy, politics, journalism).
2. Demonstrated ability to think creatively and strategically, analyse situations and identify opportunities, threats and risks.
 3. High level leadership skills with demonstrated ability to lead teams, and manage competing demands in fast-moving, hard-working environments with constrained resources.
 4. High level written and verbal communication skills, including the ability to advocate positions in a persuasive and non-confrontational manner.
 5. Experience in high level policy development and policy analysis.
 6. Experience in developing media and communications strategies, and in drafting media statements, talking points, social media, website copy, and newsletters.
 7. Positive, proactive approach with the ability to be flexible and solution-focused in changing circumstances.
 8. Outstanding time management, administration, prioritisation and organisational skills.
 9. Demonstrated financial management skills.
 10. Demonstrated ability to establish and maintain diverse relationships with stakeholders to produce 'win win' outcomes
 11. An appreciation of community Independents movement and the importance of community democracy.
 12. A respect for sensitive and confidential information.
 13. Knowledge and experience of parliamentary procedures is desirable.
 14. Experience in managing relationships with journalists is desirable.
 15. Experience in promoting community democracy is desirable.

Feedback



PERSONAL QUALITIES

The following personal qualities are desirable:

1. A positive, respectful and energetic approach to the work environment.
2. Ability to work cooperatively in a close, collaborative and challenging environment.
3. An ability to remain calm, and composed during stressful periods.
4. A sense of humour.

LICENSES & STATUTORY AUTHORITY TO WORK

Australian Citizenship or current Australian visa

PHYSICAL REQUIREMENTS OF THE ROLE

1. Able to work extended hours (12+) during Parliamentary sitting weeks and on weekends as required

 This job has expired



conditions are outlined in the *Commonwealth Members of Parliament Staff Enterprise Agreement 2020-2023* which are:

- a commencing salary between \$96,898 to \$136,607 (Adviser classification)
- an optional allowance may be considered in recognition of, and as compensation for, reasonable additional hours and travel, and
- an employer contribution of 15.4% superannuation will be payable.

A probationary period of three (3) months will apply.

Applications including a resume and cover letter setting out details of experience and the names of two referees should be forwarded to: Monique.ryan.mp@aph.gov.au

Applications close on 12 July 2022. For further information please contact Monique.ryan.mp@aph.gov.au

Feedback

Skills

+ LEADERSHIP SKILLS

+ WRITTEN AND VERBAL

Job details



Expired

13 Jul 2022



Originally posted on

5 Jul 2022



Expiring date

13 Jul 2022

 **This job has expired**



Contract type
Permanent



Work type
Full time



Job mode
Standard business hours






Work Authorisation
AUSTRALIAN CITIZEN / PERMANENT RESIDENT

Feedback

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Randstad
Melbourne VIC



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Contract

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\$57 - \$58/hr


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Randstad
Melbourne VIC

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 Feedback

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No. VID44 of 2023

Federal Court of Australia
 District Registry: Victoria
 Division: Fair Work

Sally Rugg

Applicant

The Commonwealth of Australia and another

Respondents

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "**MR-3**" now produced and shown to Dr Monique Ryan MP at the time of affirming her affidavit on 2 February 2023

Before me:



Signature of person taking affidavit

Annexure "MR-3"

Filed on behalf of (name & role of party)	The Second Respondent		
Prepared by (name of person/lawyer)	Rick Catanzariti		
Law firm (if applicable)	DLA Piper Australia		
Tel	03 9274 5810	Fax	03 9274 5111
Email	rick.catanzariti@dlapiper.com		
Address for service	80 Collins St, Melbourne VIC 3000		
(include state and postcode)			

[Version 3 form approved 02/05/2019]

Sally Rugg
140 Collins street
Thornbury, VIC, 3071

6th July 2022

The Honourable Dr Monique Ryan
655 Glenferrie Rd
Hawthorn VIC 3122

Dear Dr Ryan,

Re: Application to serve as Chief of Staff on your team

Since we first discussed the possibility of me joining your team I've become preoccupied with dreams (and schemes) of everything you could achieve in Australia's 47th parliament and how I might help facilitate it. I feel hungry for this role, for the responsibility it comes with and for the capacity to contribute to urgent and lasting reform.

I'm eager to prove my capabilities and experience, so I've attached a document that synthesises the responsibilities of the role with crucial elements of the selection criteria into general subheadings, detailing my experience in each area. I know you have oodles of spare time simply begging for extra reading so I'm sure you'll appreciate this!

Separate to addressing the criteria for the role, I wanted to provide a personal statement on how I would approach the Chief of Staff role on your team. I think the success of this role, measured by your success in your role, will ultimately hinge on the working relationship between you and the successful candidate.

Most other members of parliament have party structures, bloated resources and a flotilla of staff to cycle through offices at whim. Your Chief of Staff and your electorate team will be essential to your ability to achieve the commitments you've made to the people of Kooyong, as well as your longevity, wellbeing and perhaps even daily delight as a member of parliament.

As your Chief of Staff, I'd seek a close working relationship built on multifaceted trust. Trust that I'll deliver the work you've asked for and anticipated that which you haven't. Trust that your commitment to transparency, accountability and integrity will be mirrored in the financial operations, procedural compliance and management of your office and staff. Trust that if we encountered conflict or contention that we'd resolve it frankly, quickly and as an investment in our working relationship. Trust in my loyalty as a confidant, an ally and a deeply respectful and definitely-not-patronising personal cheerleader.

I'd hope to be a thought-partner to "Yes, and –" your big ideas and thrash out your challenges,

balancing the serious nature of the work required of us both with joy, humour and perspective.

From what I know of you, I believe we align in much of our values, our approach to work and life, our belief that a better world is possible and a drive to commit our lives in service of others. I think this alignment, as well as the skills I would bring to the role, make me a special fit for this role on your team.

Thank you for the opportunity to apply.

Yours in teal,

A handwritten signature in black ink, appearing to read 'Sally Rugg'. The signature is stylized, with a large, looped 'S' and a distinct 'R'.

Sally Rugg

Sally Rugg Chief of Staff Application
Detailed responses to selection criteria

TEAM DEVELOPMENT AND LEADERSHIP

Qualifications:

- Co-developed and facilitated the three-day management course Change Makers, through Future Women, for male managers in male-dominated industries (pilot October 2021),
- Conscious Leadership course (2019), The Management Centre course (2016),

Notable experience:

- Managed large teams of staff members, contractors and volunteers spread across multiple states during national campaigns, including on marriage equality and several election campaigns.
- Built a close-knit, high-impact team of seven from scratch in an 8 month period as Executive Director at Change.org Australia, all of whom secured promotions or extra responsibilities within the company in their first year,
- Have built a team of one FTE and two contractors in the 6 months since launching AFMRC,
- In my previous career, managed a chain of three Boost Juice stores in WA, each with 20 or more staff, then promoted to National Operations Trainer for the Boost Juice parent company,

I was hired as the Executive Director of Change.org Australia and then the National Director of Australians for a Murdoch Royal Commission because both roles required building teams from scratch, and I have a reputation in my industry for standing up happy, high-impact teams quickly and effectively.

I create teams built on trust and camaraderie and respect for every person's expertise and contribution. As Chief of Staff, I'd put a shared understanding of our team's purpose, strategy and a commitment to our goals at the heart of all operations and scaffold this shared understanding with clear decision-making processes and role delegations. My experience tells me that members of a team who are committed to clearly defined goals, who understand how their work contributes to achieving those goals, who feel trusted and respected and understand the bounds of their delegation will report high job satisfaction and produce creative, enterprising and purposeful work.

My leadership style is suited to the requirements of a good Chief of Staff. I motivate my teams with passion, enthusiasm and empowerment rather than conflict and micro-management. I am humble, eager to hear when I'm wrong and value feedback from members of my team. The role of Chief of Staff is one of facilitation, coordination and support so as to get the best out of each individual staff member and the team as a whole.

My time leading teams in campaigning and advocacy also gives me valuable experience supporting staff who care deeply about their work and who too often bear the brunt of public anger, online abuse or traumatised stakeholders. Psychological safety at work is a fundamental right of every worker, and as Chief of Staff I would implement management strategies for Dr Ryan's electorate team that I've honed over the years, as well as recommendations from the Set The Standard report to ensure the safety and wellbeing of the team in a very high pressure job.

POLICY DEVELOPMENT AND ANALYSIS

Notable experience:

- Co-developed and published a suite of policy proposals for media reform for the Senate Inquiry into Media Diversity (2021),
- Provided consultation to the Labor opposition, Greens and members of the crossbench on proposals and legislation affecting the LGBTIQ community as part of the sector's policy group (2014 – 2017),
- Analysed and reported four federal budgets from parliament house, quickly dissecting the budget papers and condensing the news for audiences on social media, traditional media and email,
- Significant experience monitoring and strategically responding to the work of parliament including tracking legislation, parliamentary processes, committee work, inquiry hearings, party-specific schedules, special events and travel,

Core to my work as a political campaigner is the timely and thorough analysis of policy so as to strategically respond to any announcement. Often, this involves finding the devil in the legislative details and quickly developing compelling, easy to understand public messaging to try to cut through a government's political spin.

Some recent examples include responding to the web of bills and amendments involved in the "Religious Freedom" horror show and the synthesis of immigration law, departmental procedures, ministerial powers and party policies to devise strategies to keep the Nadesalingam family safe from deportation.

Dr Ryan and other members of the crossbench were elected with clear policy priorities and high expectations from their constituents. My view is that the Labor government will seek opportunities to wedge the crossbench, running PR efforts for substandard climate policy and attempting to water down the power of an integrity commission. It will be crucial for Dr Ryan and her colleagues on the crossbench to have fast, pithy and accurate responses to any poor proposals.

POLITICAL STRATEGY

Notable experience:

- Developed and gained sector consensus for the Yes campaign's "get out the vote" strategy pivot for the marriage equality postal survey,
- Co-created political strategies for campaigns including the community petition for the safety of women at parliament house (delivered at the Women's March for Justice), Home to Bilo, the royal commission into veterans suicide, protecting the funding for the ABC, local council declarations of a Climate Emergency, many more
- Have written and delivered workshops and training programmes teaching political strategy,
- Wrote an Australian bestselling book distilling social research, political and activist theory and personal experience on how to develop campaign strategies,
- Australian Progress Campaigning Fellowship (2014)

I live and breathe political strategy, and hope my professional experience can speak for itself.

The last few weeks is proof that the Labor government aren't planning on making it easy for the newly formed crossbench to deliver their commitments on emissions reduction targets and integrity. I am eager to contribute my political knowledge and strategic expertise that I've developed winning campaigns across nine years of stubborn government.

Peter Dutton is a highly skilled political operator, and I believe the power the Liberal party lacks on the floor of parliament will be drummed up through the nasty 'culture war' rhetoric and policy proposals that Mr Dutton is notorious for. As Dr Ryan's Chief of Staff I'd provide valuable advice on how to strategically engage with politics of division, in parliament and in the Murdoch papers.

Outside of parliament house, prioritise sustaining community engagement from Kooyong constituents in Dr Ryan's work. It is very likely that the attacks on Dr Ryan in News Corp seen during the election campaign will continue and escalate and that she will remain a target of Liberal political establishment. The best way to counter these attacks, and perhaps reduce them, is to deepen Dr Ryan's connection with the community.

I'm brimming with ideas on how to engage Kooyong constituents, via policy work, on social media and in the community, which I'd be happy to share in person.

FINANCE AND ADMINISTRATION

Notable experience:

- Set up AFMRC and maintain reporting obligations with Consumers Affairs Victoria, Department of Justice and Community Safety (fundraising licence and disclosures), the Australian Taxation Office and in preparation for potential external inquiries (i.e. the Senate),
- Experience managing differently structured budgets, including as a junior executive with in very tightly-controlled global company responsible for multi-million dollar budgets,
- Manage my personal freelance business as a writer, speaker and facilitator via an ABN, which involves invoicing and budgeting, filing Business Activity Statements and tax returns

It's important to me to be clear that while I have experience managing budgets, running organisations and staying on top of compliance requirements, I'm not a naturally gifted administrator but, rather, a duck.

My professional achievements and personal pursuits might give an impression of me seamlessly gliding upstream as I maintain complex budget spreadsheets and submit reports to various authorities, but an office is a pond and if I have the privilege of working for Dr Ryan, she'll see my paddling.

I'd be a miserable accountant, but can run the finance operations and legal compliance of the organisation or campaign I care about. I use organisational systems and time-management to make sure work that isn't classified as "urgent and important" is delivered. I'm also very good at delegating the work I can't prioritise and creating systems to streamline administrative work (which is usually good for everyone!)

I might have lost a couple of chargers and slapped on makeup in the car more than once, but this duck spent the last eight months setting up and launching a digital, membership-based non-profit

organisation under the eagle-eyed scrutiny of News Corp and a hawkish former prime minister. I'm an expert paddler.

Technical skills:

- Finance software systems (Xero, Expensify)
- Team management and communications systems (Slack, Asana, Trello, G Suite, Zoom)
- Recruitment and HR systems (Recruiterbox, Greenhouse)
- Privacy and security administrative systems (Lockbox)

MEDIA AND COMMUNICATIONS

Notable experience:

- Nearly 10 years experience developing, testing and rolling-out messaging and communications strategies for national campaigns and complex political issues,
- Was the Creative Director at GetUp during 4 federal and state election campaigns, leading a team pumping out online video, social media content and moderation, traditional media advertising, robocall content and influencer engagement strategies,
- BA Communications and Culture Studies, Curtin University of Technology (WA)
- Two years coursework of a Masters in Broadcast Journalism, University of Technology Sydney (left before major project),

My years working both behind the scenes developing media strategy as well as in front of the media as an interviewee, a political commentator and a presenter means I'd bring unique, valuable expertise to supporting Dr Ryan's media work.

I've organised countless press conferences and media events, pumped out press releases and media statements like they're going out of style and outmanoeuvred many journalists looking to publish a hit piece. I've trained many dozens of people without media experience to become spokespeople for their issue, including the women from #HomeToBilo campaign, Julie-Ann Finney who secured a Royal Commission into veterans suicide and countless LGBTIQ community members.

I can bring to this role everything I know as a seasoned media performer with experience taking on the most hostile radio 'shock jocks', managing tricky questioning from smart reporters, staying calm under escalating pressure and sniffing out dirty tactics from press gallery hacks.

Another skill I believe would be valuable to this role is my expertise tailoring messages to different audiences and for varying purposes, whether it's data-driven, demographic micro-targeted campaign advertising on social media through to knowing the different strategies for an 9:30am ABC interview with Virginia Trioli and an 9:30am ABC interview with David Speers.

If I was to be brought on as Chief of Staff, I'd bring my relationships with a large network of journalists, particularly across the federal press gallery from day one. I've built these relationships over many years from working on large national campaigns, spending significant time in parliament house lobbying or hosting media events and from working on issue-specific petitions. I believe that Dr Ryan would be best prepared for the first week of parliament with a Chief of Staff with personal knowledge or relationships across the federal press gallery and experience managing their scrutiny.

Dr Monique Ryan is a natural media performer because she speaks authentically, warmly, and articulates the reasoning behind her answers thoughtfully and with respect for audiences. My first priorities to support Dr Ryan as she builds her confidence with media would be to provide and practise defence tactics for hostile lines of questioning, and to confirm boundaries of disclosure and transparency within her office, parliamentary work and personal life, to establish clarity on what Dr Ryan feels she can decline to tell journalists without risking the public's perception of her commitment to transparency. (This is not a pointed comment, just an idea!)

As mentioned, Dr Ryan already offers research and reasoning in her comments to media. My next priority leading communications strategy would be to develop messaging guides on the core issues Dr Ryan will be pursuing as the Member for Kooyong with personal stories from her electorate, quotes from experts or authoritative figures, findings or recommendations from research and inquiries and case studies from overseas so she can continue to build her public image as someone who makes decisions based on research, data and expert advice.

Technical skills:

- Media alerts and releases (Medianet)
- Media monitoring (Meltwater)
- Social media listening and monitoring (Hootsuite, Hubspot)
- Graphic design (Photoshop, Canva, InDesign)
- Video editing (Premier Pro, Final Cut Pro, Adobe Rush)
- Audio production (Adobe Audition, Garage Band)

RELATIONSHIP BUILDING AND STAKEHOLDER MANAGEMENT

Notable experience:

- I have professional relationships with dozens of members of federal parliament across much of the political spectrum and in both houses of parliament,
- Years of managing stakeholder relationships and facilitating collaboration across diverse groups and organisations on fast-paced, complex national campaigns including marriage equality,
- I have strong ties or professional relationships with leaders and peak bodies of many communities adversely affected by government policy and a reputation for being a person communities can turn to for professional advice or support,
- Managed between 20-40 community campaigns at a time with my team at Change.org, each with their own set of stakeholders and relationships,

In strong democracies, meaningful and lasting reform can only be achieved through work of coalitions and with (enough) political consensus. I'm excited and energised by the prospect of consulting and collaborating with the highly engaged, passionate people of Kooyong to integrate their expertise and resources to the work of their member of parliament.

With just one personal staffer supporting Dr Ryan in parliament, as Chief of Staff I would seek to work closely with other staff serving members of the crossbench (and where possible, staff serving political parties) to share what we can of the load, streamline processes where possible and create a collegiate, supportive environment between staff during sitting weeks.

I hold professional relationships borne from campaign collaboration or consultation spanning civil

society, religious organisations, the health sector, celebrities, student protest groups, political parties, academics and the media. I am keen to contribute the value of these relationships to Dr Ryan's work.

ADDITIONAL CRITERIA

- Australian Citizen with additional British Passport,
- National Police Clearance (May 2021, new one coming),
- Happy to sign Confidentiality agreement and Code of Conduct,
- No sense of humour, sadly.

No. VID44 of 2023

Federal Court of Australia
 District Registry: Victoria
 Division: Fair Work

Sally Rugg

Applicant

The Commonwealth of Australia and another

Respondents

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "**MR-4**" now produced and shown to Dr Monique Ryan MP at the time of affirming her affidavit on 2 February 2023

Before me:



Signature of person taking affidavit

Annexure "MR-4"

Filed on behalf of (name & role of party)	The Second Respondent		
Prepared by (name of person/lawyer)	Rick Catanzariti		
Law firm (if applicable)	DLA Piper Australia		
Tel	03 9274 5810	Fax	03 9274 5111
Email	rick.catanzariti@dlapiper.com		
Address for service (include state and postcode)	80 Collins St, Melbourne VIC 3000		

[Version 3 form approved 02/05/2019]

9:59



New iMessage

Cancel

To: Sally Rugg

I'm on a mostly empty plane home, couldn't face the drive or a hotel isolation and figured half the plane could be covid positive with or without me on it. So will be offline for 90 mins or so - good luck with your speech if I miss it, you'll be great

Tue, 22 Nov at 4:31 pm

Thank you.

Can't condone that one Sally- I know you just wanted to get home but I wouldn't get on a plane knowing I had covid and I couldn't advise anyone that it was an appropriate thing to do. I wish you'd let me know you were considering doing that.

Ok



iMessage



No. VID44 of 2023

Federal Court of Australia
 District Registry: Victoria
 Division: Fair Work

Sally Rugg

Applicant

The Commonwealth of Australia and another

Respondents

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "**MR-5**" now produced and shown to Dr Monique Ryan MP at the time of affirming her affidavit on 2 February 2023

Before me:



Signature of person taking affidavit

Annexure "MR-5"

Filed on behalf of (name & role of party)	The Second Respondent		
Prepared by (name of person/lawyer)	Rick Catanzariti		
Law firm (if applicable)	DLA Piper Australia		
Tel	03 9274 5810	Fax	03 9274 5111
Email	rick.catanzariti@dlapiper.com		
Address for service (include state and postcode)	80 Collins St, Melbourne VIC 3000		

[Version 3 form approved 02/05/2019]

Private and confidential

6.12.2022

Ms Sally Rugg,
Chief of Staff
Kooyong Electorate Office

Dear Sally,

Warning letter

I am writing to you about your recent actions when unwell with COVID19.

On 22.11.2022, you tested positive to COVID19 while we were in Canberra for a sitting week. We discussed what you should do next, and you indicated that you planned to either self-isolate in Canberra or drive home. Later that day, you sent me a text message indicating that you had decided to fly home and were already on a plane.

In doing so, you put other members of the public at risk. You cannot have disclosed your illness when you checked in. Had you done so, you would not have been permitted on the plane. I believe this to be illegal- if it's not, it would not have been permitted by the air carrier. I'm also disappointed that you acted in this matter despite knowing that COVID management and reduction strategies have been an important part of our team's policy platform in Kooyong. The reputational risk to our team of you travelling by plane, while knowing you had COVID, was real and significant.

I can't regard this conduct as anything other than unsatisfactory, and hence am providing you with a warning letter. I would feel compelled to terminate your employment should there be further such concerns in the next six months.

I propose that we meet this week to discuss your End of Probation review, at which point we can also discuss this letter- then meet again subsequently as required. If you wish to respond to this formal warning letter, please do so in the office, or by replying in writing.

Yours sincerely,

Monique Ryan MP

No. VID44 of 2023

Federal Court of Australia
 District Registry: Victoria
 Division: Fair Work

Sally Rugg

Applicant

The Commonwealth of Australia and another

Respondents

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "**MR-6**" now produced and shown to Dr Monique Ryan MP at the time of affirming her affidavit on 2 February 2023

Before me:



 Signature of person taking affidavit

Annexure "MR-6"

Filed on behalf of (name & role of party)	The Second Respondent		
Prepared by (name of person/lawyer)	Rick Catanzariti		
Law firm (if applicable)	DLA Piper Australia		
Tel	03 9274 5810	Fax	03 9274 5111
Email	rick.catanzariti@dlapiper.com		
Address for service	80 Collins St, Melbourne VIC 3000		
(include state and postcode)			

[Version 3 form approved 02/05/2019]

Ryan, Monique (MP)

From: Rugg, Sally (M. Ryan, MP)
Sent: Thursday, 8 December 2022 5:28 PM
To: Ryan, Monique (MP)
Cc: Simons, Tamar (M. Ryan, MP)
Subject: Re: Medical leave

Thanks Monique

I don't think I'm responsible for stress that the rest of the team might be feeling about this situation and am not sure why you've mentioned it to me at all, or in the context of my medical leave.

From: Ryan, Monique (MP) <Monique.Ryan@aph.gov.au>
Sent: Thursday, December 8, 2022 5:14:02 PM
To: Rugg, Sally (M. Ryan, MP) <Sally.Rugg@aph.gov.au>
Cc: Simons, Tamar (M. Ryan, MP) <Tamar.Simons@aph.gov.au>
Subject: RE: Medical leave

Thanks Sally

I've asked MOPS to get back to me as soon as possible.
 I really hope this matter can be settled soon.
 I'm very conscious it's a cause of significant stress for all members of our team.
 Just confirming that on Tuesday you specifically requested an end of probation review, not a performance review, as you've stated below.

Mon

Dr Monique Ryan, MP

Independent Federal Member for Kooyong

T: (03) 9326 2900

E: monique.ryan.mp@aph.gov.au

moniqueryan.com.au

[Instagram](#) | [Twitter](#) | [Facebook](#)

I acknowledge the traditional owners of the land on which I live and work, and pay my respects to their elders, past and present.

From: Rugg, Sally (M. Ryan, MP) <Sally.Rugg@aph.gov.au>
Sent: Thursday, 8 December 2022 4:55 PM
To: Ryan, Monique (MP) <Monique.Ryan@aph.gov.au>
Cc: Simons, Tamar (M. Ryan, MP) <Tamar.Simons@aph.gov.au>
Subject: Medical leave

Hi Mon,

I saw my doctor this afternoon who recommended I take stress leave from work, until the end of next week, Friday 16 December. I've attached my medical certificate and can put the leave through PEMs once I'm with my work laptop.

While on leave, I'd like to be kept in the loop with next steps regarding my performance review, once MOPs engages with the process. And I would like to come off leave to participate in the review or any other relevant meetings with MOPS if it can be scheduled for next week.

I hope to be back on deck for the strategy workshop on Monday 19th for the last week of the year.

Thanks,

Sally

No. VID44 of 2023

Federal Court of Australia
 District Registry: Victoria
 Division: Fair Work

Sally Rugg

Applicant

The Commonwealth of Australia and another

Respondents

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "**MR-7**" now produced and shown to Dr Monique Ryan MP at the time of affirming her affidavit on 2 February 2023

Before me:



 Signature of person taking affidavit

Annexure "MR-7"

Filed on behalf of (name & role of party)	The Second Respondent		
Prepared by (name of person/lawyer)	Rick Catanzariti		
Law firm (if applicable)	DLA Piper Australia		
Tel	03 9274 5810	Fax	03 9274 5111
Email	rick.catanzariti@dlapiper.com		
Address for service (include state and postcode)	80 Collins St, Melbourne VIC 3000		

[Version 3 form approved 02/05/2019]

Personal Development Plan – Feedback tracker

This template is designed to assist you in tracking feedback (experience, exposure and/or education) to plan how you can develop the capabilities you've identified as priorities to assist your employees in delivering work objectives and achieving performance goals. You should have a conversation with your employee around your identified capabilities for development and explore opportunities for how you might assist them to develop these capabilities.

Employee Name	Sally Rug	Role/Title	Chief of Staff	Supervisor	Monique Ryan
Supervisor	Monique Ryan	Role/Title	Member of Parliament	Date	

Performance expectation	Specific feedback and capabilities identified for development	Experience / Exposure / Education needs	Timeframe to review and review feedback
<i>Examples: Reports writing skills, presentation skills, managing staff, budget management, working with others, time management (including specific deadlines), behaviours exhibited in the workplace</i>	<i>Examples: Failed to meet time management requirements (i.e did not provide report by agreed date); failed to respond to constituents in agreed timeframes; lack of attention to detail in reports with significant spelling and typographical errors; identified lack of leadership skills</i>	<i>Examples: obtain coaching, find a mentor, shadow another employee, attend a seminar, workshop, program or course to gain skills, qualification or accreditation. E.g. – attend writing skills workshop</i>	<i>Examples: Review by <insert date>. Attended online training course on report writing on <date>, implemented skills to write an error free (no spelling/typographical errors) report by the agreed due date. Performance expectation now considered met.</i>

<p>Strategic planning</p> <p>Develop and execute Policy Development strategy</p> <p>Develop and execute Media and Communications strategy</p> <p>Develop and execute Community Engagement strategy</p> <p>Update the Member's official website to display current information</p>	<p>Strategies have not been developed and executed</p> <p>Official website has not been kept up to date</p>	<p>Extension of detailed strategy framework developed on 19.12.23, working off documents developed for that day-</p> <ul style="list-style-type: none"> - Community engagement - Policy development <p>Production of detailed comms strategy- newsletters, constituent mail, social media etc- for the year</p> <p>Liason with Hayden O'Connor re website update content and structure</p>	<p>To be reviewed on 23.1.23</p>
<p>Community engagement</p> <p>Progress and activate community focus groups</p>	<p>Focus groups have not been created</p> <p>Limited engagement with community/constituents to date</p>	<p>Callout for additional groups in this week's newsletter</p> <p>Need a framework for these groups- how they will run, which EO staff member will supervise each one, framework for their activities and for feedback to MP, support from EO to groups</p>	<p>To be reviewed on 23.1.23</p>

<p>Staff management</p> <p>Conduct weekly meetings with staff to oversee priorities and current matters</p> <p>Provide feedback and guidance to staff on their work and priorities</p> <p>Develop portfolios of work with staff</p>	<p>Staff have not received appropriate supervision, communication re responsibilities, oversight of activities, performance management</p> <p>New staff have not received any formal feedback re their performance</p> <p>Part-timer has not received feedback whether their employment will be extended</p> <p>Staff have not been compliant with submission of leave applications etc in recent months</p> <p>Portfolios of work responsibilities in office have not been allocated</p>		<p>Ongoing, reviewed weekly</p>
<p>Budget development</p> <p>Develop yearly budgets for review and approval</p> <p>Provide updates on expenditures and their implications</p>	<p>Need a detailed budget for publications, media, events, comms and other EO initiatives for next 12 months</p>		<p>To be set in place by 23.1.2023</p>

No. VID44 of 2023

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 Division: Fair Work

Sally Rugg

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The Commonwealth of Australia and another

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This is the annexure marked "**MR-8**" now produced and shown to Dr Monique Ryan MP at the time of affirming her affidavit on 2 February 2023

Before me:



Signature of person taking affidavit

Annexure "MR-8"

Filed on behalf of (name & role of party)	The Second Respondent		
Prepared by (name of person/lawyer)	Rick Catanzariti		
Law firm (if applicable)	DLA Piper Australia		
Tel	03 9274 5810	Fax	03 9274 5111
Email	rick.catanzariti@dlapiper.com		
Address for service (include state and postcode)	80 Collins St, Melbourne VIC 3000		

[Version 3 form approved 02/05/2019]

Ryan, Monique (MP)

From: Sally Rugg <sally.m.rugg@gmail.com>
Sent: Wednesday, 4 January 2023 4:20 PM
To: Ryan, Monique (MP)
Cc: Rugg, Sally (M. Ryan, MP); Miller, Liza (M. Ryan, MP)
Subject: Re: Emails etc

Hi Monique,

I've forwarded two invoices from the service who we loan the aph office plants from. The other emails I've received are generic emails from PEMS or responses to calendar events. There is an email from Jen Bechwati from last week that you were copied on as well, confirming that a story you interviewed for was going to air that night. I will set up an automatic forward to the office inbox.

I won't be coming into the office. I would be grateful if someone could post me my little desk calendar of Millie and the print that Liza gave me from the Cressida Campbell exhibition, and you can dispose of anything else of mine that's left in there. On my desk there is a white file full of HR, operations and volunteer documents that you might find useful, but feel free to discard with everything else if preferred. I'll arrange a courier to deliver my laptop and office pass. When parliament resumes in February I would appreciate if Liza could put my things into a bag which I'll arrange for Amy Remeikis to collect from the suite.

Please don't contact me by phone again -- you can reach me at this email address.

Thanks.

Sally

On Wed, Jan 4, 2023 at 4:02 PM Ryan, Monique (MP) <Monique.Ryan@aph.gov.au> wrote:

Hi Sally

As discussed today, I'd be grateful if you could put an automatic forward on your APH email, to the Kooyong MP electoral office email.

You indicated to me over the phone today that you've received no emails since you last attended the office – if there is anything which has come your attention since you last attended the office, I'd very grateful if you could share it with me or the other EO staff at your earliest convenience.

I'd also be grateful if you could let me know when you intend to come to the office to drop off your laptop, passes etc and pick up your personal items.

Mon

Dr Monique Ryan, MP

Independent Federal Member for Kooyong

T: (03) 9326 2900

E: monique.ryan.mp@aph.gov.au

moniqueryan.com.au

[Instagram](#) | [Twitter](#) | [Facebook](#)

I acknowledge the traditional owners of the land on which I live and work, and pay my respects to their elders, past and present.

--

Sally Rugg
0447 587 006

No. VID44 of 2023

Federal Court of Australia
 District Registry: Victoria
 Division: Fair Work

Sally Rugg

Applicant

The Commonwealth of Australia and another

Respondents

CERTIFICATE IDENTIFYING ANNEXURE

This is the annexure marked "**MR-9**" now produced and shown to Dr Monique Ryan MP at the time of affirming her affidavit on 2 February 2023

Before me:



Signature of person taking affidavit

Annexure "MR-9"

Filed on behalf of (name & role of party)	The Second Respondent		
Prepared by (name of person/lawyer)	Rick Catanzariti		
Law firm (if applicable)	DLA Piper Australia		
Tel	03 9274 5810	Fax	03 9274 5111
Email	rick.catanzariti@dlapiper.com		
Address for service (include state and postcode)	80 Collins St, Melbourne VIC 3000		

[Version 3 form approved 02/05/2019]

Ryan, Monique (MP)

From: Ryan, Monique (MP)
Sent: Thursday, 5 January 2023 2:24 PM
To: Ryan, Monique (MP Office); sally.m.rugg@gmail.com; Miller, Liza (M. Ryan, MP)
Subject: Re: The Australian: Coal compensation

Sally, you received this email at 10.38 and forwarded it after the deadline for a reply.
 Could you please set up an automatic forward to the office as I requested yesterday- and you indicated yesterday you were going to do.
 I'd be grateful if you could also set up an auto reply indicating that you are no longer at the spy email address.

Mon

From: Ryan, Monique (MP Office) <Monique.Ryan.MP@aph.gov.au>
Sent: Thursday, January 5, 2023 2:17 pm
To: Ryan, Monique (MP) <Monique.Ryan@aph.gov.au>
Subject: Fwd: The Australian: Coal compensation

From: Rugg, Sally (M. Ryan, MP) <Sally.Rugg@aph.gov.au>
Sent: Thursday, January 5, 2023 2:11:33 PM
To: Ryan, Monique (MP Office) <Monique.Ryan.MP@aph.gov.au>
Subject: Fwd: The Australian: Coal compensation

From: Maddison, Max <max.maddison@theaustralian.com.au>
Sent: Thursday, January 5, 2023 10:38:37 AM
To: Rugg, Sally (M. Ryan, MP) <Sally.Rugg@aph.gov.au>
Subject: The Australian: Coal compensation

Hey Sally

Happy New Year.

I'm asking the crossbench whether they support the potential \$1.25bn in compensation that could be handed to coal-fired power stations, and by extension, coal suppliers.

Could you get me a response to the questions below by 2pm?

- (1) Does Ms Ryan support compensating coal-fired power stations?
- (2) Does Ms Ryan support the level of compensation that may be handed to fossil-fuel companies like Rio Tinto?
- (3) Ms Ryan campaigned against fossil fuel subsidies. Does she believe compensation falls into this category?

<https://www.theaustralian.com.au/nation/state-coal-power-to-reap-500mplus/news-story/9d23ec229b90f0a53ac43400342f4ef0>

<https://www.theaustralian.com.au/nation/politics/rio-tinto-and-partners-net-450m-from-albanese-governments-coal-cap/news-story/074f4fa4091a882315122b00a6dac7a2>

Cheers

MAX MADDISON

NSW Political Correspondent

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No. VID44 of 2023

Federal Court of Australia
 District Registry: Victoria
 Division: Fair Work

Sally Rugg

Applicant

The Commonwealth of Australia and another

Respondents

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Prepared by (name of person/lawyer)	Rick Catanzariti		
Law firm (if applicable)	DLA Piper Australia		
Tel	03 9274 5810	Fax	03 9274 5111
Email	rick.catanzariti@dlapiper.com		
Address for service (include state and postcode)	80 Collins St, Melbourne VIC 3000		

[Version 3 form approved 02/05/2019]

Ryan, Monique (MP)

From: Ryan, Monique (MP)
Sent: Thursday, 12 January 2023 8:16 PM
To: Sally Rugg
Subject: RE: media

Thanks Sally

I was just letting you know as a courtesy.

M

Dr Monique Ryan, MP

Independent Federal Member for Kooyong

T: (03) 9326 2900

E: monique.ryan.mp@aph.gov.au

moniqueryan.com.au

[Instagram](#) | [Twitter](#) | [Facebook](#)

I acknowledge the traditional owners of the land on which I live and work, and pay my respects to their elders, past and present.

From: Sally Rugg <sally.m.rugg@gmail.com>
Sent: Thursday, 12 January 2023 5:44 PM
To: Ryan, Monique (MP) <Monique.Ryan@aph.gov.au>
Subject: Re: media

Hi Monique,

It's up to you if you choose to speak to media about my departure - I don't have any control over that. I suggest you don't say anything defamatory, or anything untrue that would force me to correct the record.

From my end, there is nothing to discuss further.

Thanks,

Sally

On Tue, 10 Jan 2023 at 8:31 pm, Ryan, Monique (MP) <Monique.Ryan@aph.gov.au> wrote:

Hi Sally

I've had a few people from print and TV media request a chat about the Kooyong plans for the year etc, and have scheduled those in the next couple of weeks.

No doubt some will ask about you no longer being with the team.

As we discussed before Christmas, my take on this is that the personal staffer role is extremely challenging and really too much for one person, and that in the end it wasn't a good fit.

I don't propose to say anything more than that to anyone.

Nina O'Connor has taken a leave of absence from C200 and will join the team as Acting Chief of Staff from 1.2.23.

Please let me know when you want to discuss your reference or the above.

Mon

Dr Monique Ryan, MP

Independent Federal Member for Kooyong

T: (03) 9326 2900

E: monique.ryan.mp@aph.gov.au

moniqueryan.com.au

[Instagram](#) | [Twitter](#) | [Facebook](#)

I acknowledge the traditional owners of the land on which I live and work, and pay my respects to their elders, past and present.

--

Sally Rugg
0447 587 006

No. VID44 of 2023

Federal Court of Australia
 District Registry: Victoria
 Division: Fair Work

Sally Rugg

Applicant

The Commonwealth of Australia and another

Respondents

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Annexure "MR-11"

Filed on behalf of (name & role of party)	The Second Respondent		
Prepared by (name of person/lawyer)	Rick Catanzariti		
Law firm (if applicable)	DLA Piper Australia		
Tel	03 9274 5810	Fax	03 9274 5111
Email	rick.catanzariti@dlapiper.com		
Address for service (include state and postcode)	80 Collins St, Melbourne VIC 3000		

[Version 3 form approved 02/05/2019]

70 PARLIAMENTARY SITTINGS 2023

(Issued 1 December 2022)

	MONTH	Monday	Tuesday	Wednesday	Thursday	Friday	Sat/Sun	School Holidays
A U T U M N	January						1	
		2	3	4	5	6	7/8	
		9	10	11	12	13	14/15	
		16	17	18	19	20	21/22	
		23	24	25	26 Australia Day	27	28/29	NSW, ACT, VIC, TAS, SA, WA, NT TAS
		30	31	1	2	3	4/5	
	February	6	7	8 ✂	9	10	11/12	
		13 H/SBE	14 H/SBE	15 H/SBE	16 H/SBE	17 SBE	18/19	
		20	21	22	23	24	25/26	
		27	28	1	2	3	4/5	
	March	6 WA	7	8	9	10	11/12	
		13 ACT, TAS, VIC	14	15	16	17	18/19	
		20	21	22	23	24 S ✂	25/26	
		27	28	29	30	31	1/2	
	April	3	4	5	6	7 Good Friday	8/9	QLD
		10 Easter Monday	11	12	13	14	15/16	QLD, NSW, ACT, VIC, WA, NT, TAS
		17	18	19	20	21	22/23	NSW, ACT, VIC, TAS, SA, WA
		24	25 ANZAC Day	26	27	28	29/30	SA
W I N T E R	May	1 NT, QLD	2	3	4	5	6/7	
		8	9 Budget	10 ✂	11	12	13/14	
		15	16	17	18	19	20/21	
		22 H/BE	23 H/BE	24 H/BE	25 H/BE	26 BE	27/28	
		29 ACT	30 H/BE	31 H/BE	1 H/BE	2 BE	3/4	
	June	5 WA	6	7	8	9	10/11	
		12 ACT, NSW, NT, SA, VIC	13	14	15	16 S	17/18	
		19	20 ✂	21	22	23	24/25	
		26	27	28	29	30	1/2	QLD, NT, VIC
S P R I N G	July	3	4	5	6	7 NT	8/9	QLD, NSW, ACT, VIC, NT, WA
		10	11	12	13	14	15/16	NSW, ACT, TAS, SA, WA, NT
		17	18	19	20	21	22/23	SA
		24	25	26	27	28	29/30	
		31	1	2	3	4	5/6	
	August	7	8 ✂	9	10	11	12/13	
		14	15	16	17	18	19/20	
		21	22	23	24	25	26/27	
		28	29	30	31	1	2/3	
	September	4	5	6	7	8	9/10	
		11	12 ✂	13	14	15	16/17	
		18	19	20	21	22	23/24	QLD, VIC
		25 WA	26	27	28	29	30/1	QLD, NSW, ACT, VIC, WA, NT
	October	2 ACT, NSW, SA, QLD	3	4	5	6	7/8	TAS, SA, NSW, WA, NT, ACT
		9	10	11	12	13	14/15	SA, TAS
		16	17	18	19	20	21/22	
		23 H/SBE	24 H/SBE	25 H/SBE	26 H/SBE	27 SBE	28/29	
		30	31	1	2	3	4/5	
	November	6 S	7 S VIC	8 S	9 S	10 S	11/12	
		13	14	15	16	17 S	18/19	
		20	21	22	23	24	25/26	
		27 ✂	28	29	30	1	2/3	
	December	4 S	5 S	6 S	7 S	8	9/10	
		11	12	13	14	15	16/17	
		18	19	20	21	22	23/24	
		25	26	27	28	29	30/31	

Both Houses

H = HoR only

S = Senate Only

Public Holiday

BE = Budget Estimates

SBE = Supplementary Budget Estimates

✂ = date of Senate 2/3 cut-off