

**FAIR WORK COMMISSION
AT MELBOURNE**

**APPLICATION BY AUSTRALIAN NURSING AND MIDWIFERY FEDERATION
(AM2024/11)**

RESPONSE TO THE APPLICANT'S POSITION DOCUMENT

AUSTRALIAN BUSINESS INDUSTRIAL

14 November 2025

SUMMARY OF POSITION

1. The position set out in the submission filed by Catholic Health Australia dated 14 November 2025 is supported and adopted by Australian Business Industrial (**ABI**).
2. This submission sets out ABI's position in relation to the pay and classification structure for occupational health nurses, occupation health clinical nurses and occupational health consultants (collectively, **OHNs**) in the *Nurses Award 2020*.
3. Separately, ABI has prepared a joint submission with Ageing Australia addressing the ANMF's agitation of the findings in the *Stage 3 Aged Care Decision* and *Nurses Decision* that apply to enrolled nurses and nurse practitioners working in aged care.¹

OCCUPATIONAL HEALTH NURSES

4. Some observations are made about the existing classification and pay structure in the *Nurses Award*:
 - (a) The classification structure for the OHN was modelled off the classification structure that appeared in the *Nurses (ANF - South Australian Private Sector) Award 2003*.
 - (b) The classification definitions for each level of OHN contain references to distinct skills, experience and/or qualifications. For example:
 - (i) **Occupational Health Nurse Level 1** – “at least 4 years post registration experience”;
 - (ii) **Occupational Health Clinical Nurse Level 2** – “at least 4 years post registration experience” and “completion of a relevant post-registration qualification to this field of employment”;
 - (iii) **Senior Occupational Health Clinical Nurse** – “at least 5 years post registration experience”, “coordinates the occupation health nursing service” and “provides support and direction to 4 or less occupational health nurses and/or occupational health clinical nurses”; and
 - (iv) **Occupational Health Nurse Consultant Level 3** – “at least 5 years post registration experience”, “coordinates the occupation health

¹ Applications by Australian Nursing and Midwifery Federation [2024] FWCFB 452 (**Nurses Decision**); *Stage 3 Aged Care Decision* [2024] FWCFB 150.

nursing service” and “provides support and direction to 5 or more occupational health nurses and/or occupational health clinical nurses”.

- (c) Each level includes 4-5 pay points. The progression between the pay points is “*by annual movement*” (see clause 15.2(a)). Despite the reference to “*the acquisition and use of skills*” and “*knowledge*” in paragraph (b), the progression is primarily time-based.
 - (d) There is alignment between the OHN and RN pay structures. Specifically, Occupational Health Nurse Level 1, pay point 1 is aligned to RN1, pay point 4. Although progression through both structures is currently based on the anachronistic years of service model, this alignment is consistent with experience requirement for an Occupational Health Nurse Level 1: “*an RN with at least 4 years post registration experience*”.
5. For the following reasons, the ANMF proposal for the OHN pay structure is supported:
- (a) The removal of pay points is consistent with the principles and reasoning set out in the *Nurses Decision*.
 - (b) The proposed pay structure from the OHNs is appropriately aligned to the modified RN structure. This is achieved by aligning:
 - (i) Occupational Health Nurse Level 1 to RN1 upon the completion of 4 years, which continues to recognise the Occupational Health Nurse Level 1 requirement of having “*at least 4 years post registration experience*”;
 - (ii) Occupational Health Clinical Nurse Level 2 to the RN2 pay structure, which recognises an increase in pay upon the completion of 3 years;
 - (iii) Senior Occupational Health Clinical Nurse to RN2 upon completion of 3 years; and
 - (iv) Occupational Health Nurse Consultant Level 3 to RN3.
6. We agree that no amendment is required to the classification definitions in clause A.6. This extends to retaining the titles for each level as well (i.e. occupational health nurse, occupational clinical nurse, etc).
7. The ANMF proposal for the OHN pay structure is supported.

On behalf of ABI



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