



# DECISION

*Fair Work Act 2009*

s.157—FWC may vary etc. modern awards if necessary to achieve modern awards objective

## **Gender-based undervaluation — priority awards review — *Health Professionals and Support Services Award 2020***

(AM2024/20)

JUSTICE HATCHER, PRESIDENT  
VICE PRESIDENT ASBURY  
DEPUTY PRESIDENT O’NEILL  
DEPUTY PRESIDENT SLEVIN  
DEPUTY PRESIDENT GRAYSON

SYDNEY, 26 MAY 2026

*Gender-based undervaluation – priority awards review – Health Professionals and Support Services Award 2020 – health professionals – decision finalising drafting of determination.*

### **Introduction**

[1] In our initial decision issued on 16 April 2025<sup>1</sup> (**April decision**) we found that the classifications and minimum wage rates prescribed by the *Health Professionals and Support Services Award 2020* (**HPSS Award**) for health professionals had been the subject of gender-based undervaluation and that, for the purpose of s 157(2)(a) of the *Fair Work Act 2009* (Cth) (**FW Act**), an adjustment to those rates of pay was justified by ‘work value reasons’ (as defined in s 157(2A)). We expressed provisional views as to how the identified gender-based undervaluation should be rectified by way of variations to the classifications and rates of pay.

[2] In our decision of 24 December 2025<sup>2</sup> (**December decision**), we determined the classification criteria and wage rates for health professionals and the operative date and approach to phasing-in that would be adopted. We also determined that we would replace the current Schedule B with a table which specifies, for each profession, what can be identified as the standard minimum qualification<sup>3</sup> noting that where no standard minimum qualification can be identified, the table will list the identifiable alternative minimum qualifications.

[3] We foreshadowed that the finalisation of variations concerning health professionals under the HPSS Award would be subject to publication of a draft determination for comment, to be issued with a statement which explained its intended operation.

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<sup>1</sup> *Gender-based undervaluation – priority awards review* [2025] FWCFB 74, 340 IR 1.

<sup>2</sup> [2025] FWCFB 297.

<sup>3</sup> *Ibid* [137].

[4] On 2 March 2026, we published a statement<sup>4</sup> and draft determination (**draft determination**) regarding proposed variations to address the gender-based undervaluation of the work of health professionals under the HPSS Award. That statement directed interested parties to file any submissions in relation to the accompanying draft determination by 4:00 pm (AEDT) on 23 March 2026.

[5] The following parties filed submissions in relation to the draft determination:

Active Ability

Australian Business Industrial / NSW Business Chamber (**ABI**)

Australian Catholic University

Australian Chiropractors Association (**ACA**)

Australian Diagnostic Imaging Association (**ADIA**)

Australian Industry Group (**Ai Group**)

Australian Pathology

Australian Physiotherapy Association

Australian Podiatry Association (**APoDA**)

Australian Services Union (**ASU**)

Ethos Health

Exercise & Sports Science Australia

Healthscope Operations Pty Limited and the Adelaide Community Health Care Alliance Incorporated (**Healthscope**)

Health Services Union and Australian Council of Trade Unions (**HSU/ACTU**)

HR for Health Leaders (**HRfHL**)

Occupational Therapy Australia (**OTA**)

Oral Health Association of Australia

Speech Pathology Australia

[6] This decision finalises the variations to be made to the HPSS Award to address the gender-based undervaluation of the work of health professionals.

[7] Some of the submissions filed invited us to revisit our conclusions regarding various matters that had been determined to finality in the April decision and/or the December decision. These matters included the classification structure and criteria (including various definitions and descriptors, reliance on the Australian Qualification Framework levels (**AQF**), operative date and phasing in and the approach taken to identifying standard minimum qualifications in Schedule B for every health profession). Except where specifically discussed below, we do not otherwise intend to depart from the findings and conclusions about those matters stated in the April and December decisions.

### **Issues raised by the parties in submissions**

[8] The parties' submissions raised, in summary, the following issues:

- (1) Whether certain professions which were excluded from Schedule B in the draft determination but are currently included in Schedule B of the HPSS Award

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<sup>4</sup> [2026] FWCFB 47.

should remain in Schedule B and, if so, what nomenclature should be used and what AQF Level/s should be identified as the Standard Minimum Qualification/s.

- (2) What qualifications should be included or excluded in relation to other health professions in Schedule B.
- (3) Whether current clause 17.1 should remain in the HPSS Award.
- (4) Whether the new classification structure should commence on 30 June 2026 as proposed in the December decision or at a later date, and whether the five year phase-in period determined in the December decision should be extended.
- (5) Whether wage increases should be absorbed by minimum wage rate increases resulting from future Annual Wage Reviews.
- (6) Specific drafting issues (set out later in this decision).

## Consideration

### *What professions will be included in Schedule B and what will the Standard Minimum Qualification be?*

[9] At [137] of the December decision, we outlined that the list of common health professionals contained in Schedule B of the HPSS Award will be replaced with a table which specifies what can be identified as the standard minimum qualification, or alternative minimum qualifications, for each profession. We further observed, at [140] of the December decision, that the nomenclature of some Schedule B professions may no longer be fit for purpose and that this presented difficulties in identifying a standard minimum qualification. We also noted that some of the professions currently identified in Schedule B may not properly be characterised as a health professional.

[10] The Statement identified that the following professions which are currently included in the list of Common Health Professionals in Schedule B of the HPSS Award were not included in Schedule B in the draft determination:<sup>5</sup>

- Biomedical Technologist
- Client Advisor/Rehabilitation Consultant
- Radiation Therapy Technologist
- Research Technologist
- Medical Record Administrator
- Play Therapist
- Pastoral Carer
- Homeopathist
- Medical Laboratory Technician

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<sup>5</sup> This list excludes the profession of Nuclear Medicine Technologist, which was incorrectly included in the Statement as an Excluded Occupation whilst being included in Schedule B in the draft determination.

- Medical Photographer/Illustrator
- Medical Technician/Renal Dialysis Technician
- Ultrasonographer
- Musculoskeletal Therapist

(together, the ‘**Excluded Professions**’).

[11] The Ai Group submits that Recreation Therapist has also been excluded from Schedule B in the draft determination. However, this health profession was included in Schedule B in the draft determination, albeit combined with the profession of Diversional Therapist.

[12] ABI raises concerns regarding the proposed removal of the Excluded Professions from the HPSS Award and submits that, with the potential exception of Pastoral Carer, each of the Excluded Professions appear on their face to be properly regarded as health professionals. It submits that where the nomenclature is outdated, it should be replaced with the appropriate contemporary nomenclature and that removal of the Excluded Professions from Schedule B may lead to increasing confusion and uncertainty as to award coverage.

[13] The HSU/ACTU submit that the Excluded Professions should remain in Schedule B. It advances submissions that removal of any of the professions without the Expert Panel receiving evidence or making findings, especially in relation to whether a professional may not be properly characterised as a health professional, would constitute a significant change and may result in those professions either expressly losing award coverage or having uncertainty created as to their award coverage. It submits that this would be a significant change which could potentially disadvantage both award-reliant employees and those employees covered by enterprise agreements in circumstances where a number of the Excluded Professions are currently covered by enterprise agreements which provide classifications for them.

[14] The HSU/ACTU seek an opportunity to put on evidence regarding the Excluded Professions. It submits that this could properly be done if an application is made to vary the HPSS Award to remove any profession or during the review of Schedule B, foreshadowed by the Expert Panel at [140] of the December decision.<sup>6</sup> The HSU/ACTU submit that the status quo should be maintained in the intervening period and that the Expert Panel would not be satisfied that removing the Excluded Professions from the list at Schedule B is justified or necessary to meet the modern awards objective.

[15] The HSU/ACTU make submissions that many of the Excluded Professions are currently referred to in various industrial instruments and the nomenclature is currently used and understood (including that of Biomedical Technologist, Client Advisor/Rehabilitation Consultant, Radiation Therapy Technologist, and Research Technologist). It submits that the profession of a Medical Record Administrator should be merged with a Health Information Manager, Sonographer merged with Ultrasonographer and that a Play Therapist should now be referred to in the HPSS Award as a Play Therapist/Child Life Therapist. For many of these occupations the HSU/ACTU’s proposed Standard Minimum Qualification is derived from

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<sup>6</sup> [2025] FWCFB 297 [140].

enterprise agreement requirements, professional body requirements or reflects the qualifications recorded in the table at [123] of the April decision.

[16] It proposes that the following Excluded Professions and their Minimum Standard Qualifications be included in Schedule B as follows:

<b>Profession</b>	<b>Minimum Standard Qualification</b>
Biomedical Technologist	AQF Level 5
Client Advisor/Rehabilitation Consultant	AQF Level 7
Radiation Technologist Therapist/Radiation Therapy	AQF Level 7 AQF Level 8 AQF Level 9
Research Technologist	AQF Level 7
Health Information Manager/Medical Record Administrator	AQF Level 7 AQF Level 8 AQF Level 9
Play Therapist	AQF Level 7
Pastoral Carer	AQF Level 7
Homeopathist	AQF Level 7
Medical Laboratory Technician	AQF Level 5
Medical Photographer/Illustrator	AQF Level 5 AQF Level 6 AQF Level 7
Medical Technician/Renal Dialysis Technician	AQF Level 5
Ultrasonographer	AQF Level 8
Musculoskeletal Therapist	None identified

[17] In relation to Musculoskeletal Therapists, the HSU/ACTU acknowledge that they have not been able to ascertain whether this remains a current health profession and/or whether these health professionals are now Musculoskeletal Physiotherapists or Myotherapists. They submit that the profession should be retained in the list at Schedule B or, in the alternative, if the Expert Panel is to remove this profession from the list, a note should be added to both the Schedule B entry for Physiotherapist and the entry for Myotherapist noting that some employees working in those occupations may in the past have been known as a Musculoskeletal Therapist, making it clear that it has not been determined that the profession is not characterised as a health profession (and therefore removed from award coverage altogether), but because it is understood that that profession may have been subsumed into the Physiotherapy and Myotherapy Professions.

[18] The ADIA submits that the draft determination correctly retained all radiology professionals in Schedule B.

[19] Having regard to the submissions of the parties we have determined to retain some of the Excluded Professions as Common Health Professionals in Schedule B of the HPSS Award. These are Client Advisor/Rehabilitation Consultant, Biomedical Technologist, Research Technologist, Radiation Therapy Technologist/Radiation Therapist and Medical Laboratory Technician. The Standard Minimum Qualifications for the professions of Biomedical

Technologist, Research Technologist, and Medical Laboratory Technician will be as outlined in the table at [16] above. We deal further with the occupations of Radiation Therapy Technologist/Radiation Therapist and Ultrasonographer when considering other related professions below. As previously foreshadowed, Schedule B will be reviewed during the next two years to examine whether it should be retained or updated.

[20] We emphasise that Schedule B does no more than provide an *indicative* list of common health professionals and their qualifications. It does not define the extent of the coverage of the HPSS Award with respect to health professionals. The coverage of the HPSS Award is prescribed by clause 4.1 read in conjunction with the classification definitions in Schedule A. Where we have determined below not to include one of the Excluded Professions in Schedule B as a result of our not being able to determine the correct nomenclature and/or standard minimum qualification it does not follow that the coverage of the HPSS Award has been contracted in any way. As the HPSS Award is an occupational as well as an industry award then, provided that a health professional meets one of the descriptors in one of the classifications in Schedule A, they will be covered by the HPSS Award and they will be classified by reference to the AQF level of the qualification that they hold, pursuant to Schedule B.2(c).

[21] We set out our reasoning regarding the Excluded Professions below.

*Client Advisor/Rehabilitation Consultant*

[22] We had previously excluded this profession from the draft determination. The HSU/ACTU's submissions regarding this profession are summarised above.

[23] The Expert Panel has previously received submissions from the Australian Rehabilitation Providers Association (**ARPA**) which describes itself as the peak industry body representing workplace rehabilitation providers and professionals delivering workplace and occupational rehabilitation services nationally. The ARPA submits that workplace rehabilitation consultants are tertiary-qualified health professionals who are required to maintain their own registration with relevant authorities and work with individuals, employers, insurers, and other medical and health professionals in a variety of service delivery systems, in order to achieve the best possible outcomes for clients, across mental and physical injury domains.

[24] Data provided by the ARPA in their submissions discloses that their members hold a range of qualifications in the following professions:

- a. Chiropractic
- b. Exercise Physiology
- c. Medical Practitioner
- d. Nursing
- e. Occupational Therapy
- f. Osteopathy
- g. Physiotherapy
- h. Psychology
- i. Rehabilitation Counselling
- j. Social Work

[25] In addition to these areas of qualification, on its website ARPA identifies that students will be eligible for membership of ARPA if they hold or are studying a Bachelor's or Master's degree in the areas of Orthotist / Prosthetist, Paramedic and Speech Pathology<sup>7</sup>.

[26] Based on these submissions, we consider that the profession of Client Advisor/Rehabilitation Consultant should be included in Schedule B. These health professionals could notionally refer to any degree-qualified allied health professional who works as a rehabilitation consultant. The relevant standard minimum qualification may differ depending on the type of rehabilitation that they provide support for. We consider that, accordingly, these professions should be treated in a similar way to social workers and counsellors. We have determined to include AQF Levels 7, 8 and 9 for Client Advisor/Rehabilitation Consultant in Schedule B.

#### *Medical Record Administrator*

[27] We are not able to conclude that a Health Information Manager and Medical Record Administrator are alternate descriptors for the same role, based on the submissions made in these proceedings and publicly-available information including that published by the Health Information Management Association Australia (**HIMAA**), which describes itself as the only professional association to accredit higher education in health information management.<sup>8</sup>

[28] We have not been able to identify the standard minimum qualification for a Medical Record Administrator. The HSU/ACTU submits that these should be AQF Levels 7, 8 and 9 on the basis that the profession is the same as that of Health Information Manager. The Private Hospitals group have previously made submissions that the relevant qualification for a Medical Record Administrator is at a Certificate III level.

[29] We have determined not to include Medical Record Administrators in Schedule B.

#### *Play Therapist*

[30] The HSU/ACTU submit that the profession of Play Therapist should be included in Schedule B as an AQF Level 7 role and referred to in the HPSS Award as a Play Therapist/Child Life Therapist. It relies on the *Allied Health Professionals (Victorian Public Sector) (Single Interest Employers) Enterprise Agreement 2021-2026*<sup>9</sup> to demonstrate that the role currently exists and that this is the appropriate qualification.

[31] We are not able to conclude that a Play Therapist and Child Life Therapist are alternate descriptors for the same role, based on the submissions made in these proceedings and publicly-available information including that published by the Australian Play Therapists Association (**APTA**) and the Association of Child Life Therapists. We decline to insert a reference to Child Life Therapists into the HPSS Award.

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<sup>7</sup> [Become an ARPA Member - Australian Rehabilitation Providers Association](#) (accessed 13 April 2026).

<sup>8</sup> [About HIMAA](#).

<sup>9</sup> AE518146.

[32] The APTA website records that Play Therapists usually hold a primary qualification in a relevant mental health field such as counselling, psychotherapy, social work, psychology, and mental health nursing, whilst also having undertaken specific play therapy training and supervision and that there is no overarching governing or regulating body that legally requires a Play Therapist to be registered in order to practice play therapy<sup>10</sup>.

[33] We have determined not to include Play Therapists in Schedule B.

#### *Musculoskeletal Therapist*

[34] As outlined above, the HSU/ACTU submit that this profession should be retained in the list at Schedule B or, in the alternative, a note added to both the Schedule B entry for Physiotherapist and the entry for Myotherapist noting that some employees working in those occupations may in the past have been known as Musculoskeletal Therapist.

[35] We have determined to adopt the alternative approach proposed by the HSU/ACTU. Accordingly, Musculoskeletal Therapists will be removed from Schedule B.

#### *Pastoral Carer*

[36] As outlined above, the HSU/ACTU submit that the profession should be retained in the list at Schedule B but renamed as Pastoral Carer/Spiritual Carer. It submits that, based on the position previously agreed between the parties to these proceedings, the *Cabrini Health, Health Professionals Agreement 2023* and information from Spiritual Care Australia, which describes itself as the peak Australian body for spiritual care, that the relevant qualification to be recorded in Schedule B is AQF Level 7.

[37] Other than the enterprise agreement relied upon by the HSU/ACTU we have received little guidance regarding the standard minimum qualification. Publicly-available information does not assist. Spiritual Care Australia publishes vague information regarding educational requirements to become a Spiritual Care Practitioner and does not accredit specific courses<sup>11</sup>. We have determined not to include Pastoral Carer or Spiritual Carer in Schedule B.

#### *Medical Technician/Renal Technician, Homeopathist, Medical Photographer and Medical Illustrator*

[38] We have determined not to include references to Medical Technician/Renal Technician, Homeopathist, Medical Photographer and Medical Illustrator in the list of Common Health Professionals and standard minimum qualifications in Schedule B.

#### *Biomedical Technologist, Research Technologist and Medical Laboratory Technician*

[39] We are satisfied based on the submissions of the HSU/ACTU that these remain current health professions, that the nomenclature is fit for purpose and that the standard minimum

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<sup>10</sup> [Training — Australian Play Therapists Association](#) (accessed 13 April 2026).

<sup>11</sup> [Spiritual Care Australia](#).

qualification identified in the table at [20] above is appropriate for inclusion in Schedule B of the HPSS Award.

***What qualifications should be included in relation to health professionals listed in Schedule B?***

[40] The Statement provided parties with the opportunity to make submissions regarding any qualifications which should be included or excluded in relation to any health professional listed in Schedule B of the draft determination (consistent with the framework at [134] to [140] of the December decision)<sup>12</sup>.

[41] Submissions were made regarding the following health professionals:

- a. Clinical Perfusionist
- b. Sonographer
- c. Speech Pathologist
- d. Community Development Worker
- e. Dietician
- f. Medical Librarian
- g. Occupational Therapist
- h. Orthoptist
- i. Pharmacist
- j. Physiotherapist
- k. Podiatrist
- l. Chiropractor
- m. Medical Imaging Technologist (including Medical Radiographer, Magnetic Resonance Imaging Technologist, Radiation Therapist)
- n. Nuclear Medicine Technologist

[42] We will deal with each of these in turn.

*Clinical Perfusionist*

[43] The draft determination identified AQF Level 9 as the Standard Minimum Qualification for a Clinical Perfusionist. Healthscope's primary argument is that where there is no 'identifiable "standard minimum qualification"', the HPSS Award should include only a single minimum AQF level for entry into the profession, being the lowest qualification set out in Schedule B.3 of the draft determination. We have already considered this approach and rejected it and we are not persuaded to adopt it now. In the alternative, Healthscope argues, that for Clinical Perfusionist the AQF levels should be 7 and 8. Healthscope has not further identified the basis of its submission. No other party has made a submission that the proposed AQF levels should be altered for this health professional. The Standard Minimum Qualification/s for Clinical Perfusionist will be AQF Level 9.

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<sup>12</sup> [2026] FWCFB 47 [20].

*Sonographer*

[44] The draft determination identified AQF Level 8 as the Standard Minimum Qualification for a Sonographer. Healthscope submits that for Sonographers the AQF level recorded in Schedule B of the HPSS Award should be AQF Level 7. Healthscope has not further identified the basis of its submission. The ADIA submits that AQF Level 8 is the accurate qualification level in Schedule B for a Sonographer. No other party has made a submission that the proposed AQF levels should be altered for this health professional. The Standard Minimum Qualification for Sonographer will be AQF Level 8.

[45] Further, the ADIA considers that ‘Sonographer’ is the correct nomenclature to refer to these professionals, rather than ‘Ultrasonographer’. The HSU/ACTU have proposed that we combine the reference to ‘Ultrasonographer’ currently appearing in Schedule B with ‘Sonographer’ on the basis that both titles are used in the health sector and as Ultrasonographer and Sonographer are the same profession. We are not persuaded to adopt the approach proposed by the HSU/ACTU. In reaching this conclusion, we have not determined that Ultrasonographers are not health professionals. We repeat our observations at [20] above.

*Speech Pathologist*

[46] The draft determination identified AQF Levels 7, 8 and 9 as the Standard Minimum Qualifications for a Speech Pathologist. HRfHL, which describes itself as providing human resources advisory services and strategic business advice to allied health practices across Australia, submits that this should be recorded as either AQF Level 7 or AQF Level 8. HRfHL strongly supports standardising the entry pathway for each profession and identifying one qualification only in Schedule B rather than including numerous qualifications.<sup>13</sup> It submits that having pay set by the qualification held would create inequity within workplaces and that practitioners performing the same profession within the same workplace should not be paid differently as a result of their university pathway or course structure being different. It acknowledges that a reasonably large proportion of courses for speech pathologists are delivered as Honours programs, and many students do a general degree plus a Master’s degree, and that accordingly an AQF Level 8 qualification is likely more appropriate to be included as the standardised option.

[47] Speech Pathology Australia submits that there should be a convergence of rates after the first year of employment. It also proposes various amendments to the classification descriptors for health professionals. These proposals would affect the structure for all health professionals. The classification structure and descriptors for health professionals have already been determined to finality in our April decision and December decision and we do not intend to revisit them again. No other party has made a submission that the proposed AQF levels should be altered for this health professional.

[48] As we have previously made clear, it is undesirable, generally speaking, for persons practising the same profession — perhaps even for the same employer — to be paid differently depending upon the university course which they happened to undertake to qualify for that profession. However, in some professions, as a matter of fact, there is simply no one identifiable

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<sup>13</sup> Similar submissions are made by Ethos Health.

‘standard minimum qualification’. We are not persuaded to depart from the framework and approach that we outlined in our December decision.

[49] In our December decision we said:<sup>14</sup>

Speech pathology is an example of a profession where there is no standard pathway for entry: Speech Pathology Australia’s submission states that there are a substantial number of qualifying courses at each of AQF Levels 7, 8 and 9. Although, as their submission states, there were more courses at AQF Level 9 than at each of AQF Level 7 or AQF Level 8, the majority are not at this level and therefore we are not persuaded that speech pathology should be recognised as an AQF Level 9 profession. Consistent with the approach we have just articulated, we consider instead that all three AQF levels should be specified in Schedule B, with an employee being paid according to the qualification held.

[50] We have not been persuaded to depart from this conclusion. The Standard Minimum Qualification/s for Speech Pathologist will be AQF Levels 7, 8 and 9.

*Community Development Worker*

[51] The draft determination identified AQF Levels 5, 6 and 7 as the Standard Minimum Qualification/s for a Community Development Worker. The HSU/ACTU submit that this should be AQF Level 7 only on the basis that there are 53 courses accredited by Community Work Australia, which describes itself as the peak body for aspiring community workers and practicing community work professionals. These include 17 at Diploma level (AQF Level 5) and 36 at Bachelor’s degree level (AQF Level 7), with the latter constituting a clear majority of qualifications. No other party has made a submission that the proposed AQF levels should be altered for this health professional.

[52] As outlined in the December decision and summarised in the Statement we have articulated a framework for applying the ‘standard minimum qualification’ criterion including:

- removing ‘outlier’ courses at lower AQF levels from consideration;<sup>15</sup> and
- accounting for where there is genuinely no standard as to the qualification level necessary to enter the profession, such as where there are significant numbers of qualifying courses available across multiple AQF levels, or where there are only a few qualifying courses available.<sup>16</sup>

[53] It does not follow that applying this framework will inevitably mean that just because a majority of courses are offered at a particular level for entry into a profession that this will automatically mean that this will be the ‘standard minimum qualification’ criteria in Schedule B. We have considered the various courses offered for Community Development Workers.<sup>17</sup> In our view the qualification required for the profession may vary depending on the specific nature of the Community Development Worker role. However, it does appear that the

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<sup>14</sup> December decision at [138].

<sup>15</sup> [2025] FWCFB 297 [136].

<sup>16</sup> Ibid [138].

<sup>17</sup> [Community Work Australia - Accredited Courses](#) (accessed 13 April 2026).

qualifications are at AQF Levels 5 and 7 only. Accordingly, Standard Minimum Qualification will be AQF Levels 5 and 7 only.

### *Dietician*

[54] The draft determination identified AQF Levels 7, 8 and 9 as the Standard Minimum Qualifications for a Dietician. The HSU/ACTU submit that the Standard Minimum Qualification this should be AQF Level 9 only. They submit that accreditation through Dietitians Australia, the relevant industry body, can be obtained through completion of either one Bachelor's degree course (AQF Level 7), five Honours' degree courses (AQF Level 8) or 15 Master's degree courses (AQF Level 9). HRfHL submits that the qualification distribution is: two Bachelor's degree courses (AQF Level 7), four Honours' degree courses (AQF Level 8) and 17 Master's degree courses (AQF Level 9). An analysis of the courses accredited by Dietitians Australia demonstrates that there are two accredited courses at AQF Level 7.<sup>18</sup> No other party has made a submission that the proposed AQF levels should be altered for this Health Professional. We intend to record the Standard Minimum Qualification/s as AQF Levels 7, 8 and 9 in Schedule B of the HPSS Award. The HSU/ACTU also submitted that references in the HPSS Award to "Dietician" should be changed to "Dietitian". We have determined to adopt this change in nomenclature.

### *Medical Librarian*

[55] The draft determination identified AQF Level 8 as the Standard Minimum Qualification for a Medical Librarian. The HSU/ACTU submits that this should be AQF Level 9. It submits that in order to obtain associate membership of the Australian Librarian and Information Association, a Medical Librarian must have completed one of eight currently offered accredited courses, being: one Bachelor's degree, two Graduate Diplomas and five Master's degrees. It submits that as, the majority of qualifications that are offered for entry into the profession are Master's degrees, the qualification recorded in Schedule B should be AQF Level 9. No other party has made a submission that the proposed AQF levels should be altered for this health profession. We repeat our observations above regarding the majority of degrees not being the criterion that we have adopted to determine the Standard Minimum Qualification/s. The Standard Minimum Qualification for Medical Librarian will remain as AQF Level 8.

### *Occupational Therapist*

[56] The draft determination identified AQF Level 7 as the Standard Minimum Qualification for an Occupational Therapist. The HSU/ACTU submit that this should be changed to AQF Levels 7, 8 and 9. They submit that the spread of qualifications is broadly equivalent to that of Speech Pathologists and that this profession should be treated in the same way, with multiple qualifications included in Schedule B. OTA, which describes itself as the peak membership body representing over 34,000 occupational therapists, submits that the current occupational therapy program landscape is not confined to a single bachelor-level pathway with accredited entry-to-practice programs spanning Bachelor's, Bachelor's Honours, Master's and combined Bachelor's/Master's pathways. These include 19 Bachelor's degree courses (AQF Level 7),

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<sup>18</sup> [University programs | Dietitians Australia](#) (accessed 14 April 2026).

29 at Honours level (AQF Level 8) and 17 degrees at AQF Level 9 (including double degrees) which are accredited by the Occupational Therapy Council of Australia.<sup>19</sup>

[57] HRfHL’s submission records the same or similar number of degrees at every level and proposes that the qualification in Schedule B be recorded as either an AQF Level 7 or AQF Level 8. We consider that AQF Level 7 is the clear standard *minimum* qualification for entry into this profession.

#### *Orthoptist*

[58] The draft determination identified AQF Levels 8 and 9 as the Standard Minimum Qualification for an Orthoptist. The HSU/ACTU submit that this should be AQF Level 9 only. They submit that, for registration with the Australian Orthoptic Board, an Orthoptist must have completed one of three recognised programs of study which currently include one Bachelor of Orthoptics (Honours) and two Master of Orthoptics degrees. No other party has made a submission that the proposed AQF levels should be altered for this Health Professional. We repeat our observations at [135] of the December decision that the profession of Orthoptist is a smaller one where there are only a few qualifying courses. As such, we consider that no standard is identifiable. We intend to record the Standard Minimum Qualification for Orthoptist as AQF Levels 8 and 9 in Schedule B of the HPSS Award.

#### *Pharmacist*

[59] The draft determination identified AQF Level 7 as the Standard Minimum Qualification for a Pharmacist. The HSU/ACTU submits that this should be recorded in Schedule B of the HPSS Award as AQF Level 8. It submits that for registration with the Pharmacy Board of Australia/the Australian Health Practitioner Regulation Agency (AHPRA), a Pharmacist must have completed one of 37 approved programs of study. These include four Bachelor’s degrees, 26 Honours degrees, and seven Master’s degrees. The Pharmacy Council of Australia, which is the body authorised by the Pharmacy Board of Australia and AHPRA to provide accreditation for pharmacy programs of study, publishes a list of currently accredited courses along with their AQF level. That list confirms that each of the Honours courses are AQF Level 8. The HSU/ACTU submit that as AQF Level 8 courses make up the majority of the total accredited courses available, AQF Level 7 does not appear to be the correct standard minimum qualification. No other party has made a submission that the proposed AQF levels should be altered for this Health Professional.

[60] Whilst we accept that the majority of the degrees accredited by the Pharmacy Council of Australia are higher than an AQF Level 7, as we determined in the April decision, “the regulatory requirements to be employed as a pharmacy intern are that the employee must have completed an approved program of study (usually involving a four-year undergraduate degree) and obtained provisional registration from the Pharmacy Board of Australia (Pharmacy Board)”.<sup>20</sup> This is not an outlier position. In the April decision we determined that it was appropriate for pharmacists covered by the *Pharmacy Industry Award 2020* to have their rate of pay aligned with the C1(a) benchmark rate in the *Manufacturing and Associated Industries*

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<sup>19</sup> Occupational Therapy Council of Australia, [Accreditation Status of Australian Occupational Therapy Programs](#) (March 2026).

<sup>20</sup> April Decision at [73].

*and Occupations Award 2020.*<sup>21</sup> We do not intend to depart from this approach for those Pharmacists covered by the HPSS Award. The Standard Minimum Qualification for a Pharmacist will remain at AQF Level 7.

#### *Physiotherapist*

**[61]** The draft determination identified AQF Level 7 as the Standard Minimum Qualification for a Physiotherapist. The HSU/ACTU and the Australian Physiotherapy Association, which describes itself as the peak body representing the interests of Australian physiotherapists, submit that the Standard Minimum Qualification should be AQF Levels 7, 8 and 9. HRfHL submits that either AQF Levels 7 or 8 should be included in Schedule B with AQF Level 8 being the more appropriate given that a reasonably large proportion of courses are being delivered as honours programs, and many students are doing a general degree plus a Master's degree. These parties submit that the courses that allow for general registration with the Physiotherapy Board of Australia/AHPRA include between 13 and 17 Bachelor's Degrees (AQF Level 7), 20 qualifications at AQF Level 8 and 24 qualifications at AQF Level 9. The HSU/ACTU submit that the situation for Physiotherapists is akin to that of Speech Pathologists. We do not accept this submission since AQF Level 7 is the clear standard *minimum* qualification for entry into this profession.

#### *Podiatrist*

**[62]** The draft determination identified AQF Level 7 as the Standard Minimum Qualification for a Podiatrist. APoDA, which describes itself as the peak professional body for podiatrists, submits that this should be AQF Levels 7 to 10, reflecting the profession's broader qualification pathways and also to provide consistency with the approach adopted for other health professionals in Schedule B. The HSU/ACTU submit that the Standard Minimum Qualification should be AQF Levels 7, 8 and 9. They submit that for general or general and endorsement registration with the Podiatry Board of Australia/AHPRA, an (entry level) Podiatrist must have completed one of 24 approved programs of study, which include nine Bachelor's degrees, 11 Honours degrees and four Master's degrees (not counting the programs which provide for endorsement only or specialist registration). Our review of the qualifications currently accredited by the Podiatry Board of Australia include six at AQF Level 7 and seven at AQF Level 8.<sup>22</sup> The currently-accredited courses (3) at doctorate level appear to be for specialist registration. We are not persuaded that the position stated in the draft determination should be altered. AQF Level 7 is the standard *minimum* qualification and is clearly not an 'outlier' qualification.

#### *Chiropractor*

**[63]** The draft determination identified AQF Level 7 as the Standard Minimum Qualification for a Chiropractor. HRfHL submits that this should be recorded as AQF Level 9 as Chiropractors cannot obtain AHPRA registration with only a Bachelor's degree and registration requires both a Bachelor's and Master's degree (such as is the case with osteopaths). The ACA, which describes itself as the peak body representing the interests of Australian chiropractors

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<sup>21</sup> April decision at [103].

<sup>22</sup> [Podiatry Board of Australia - Accredited programs](#) (accessed on 13 April 2026).

and the chiropractic profession including both employees and employers, submits that Schedule B should include both AQF Levels 7 and 9. It submits that the proposed Schedule B entry for Chiropractors is not an accurate reflection of the current AHPRA registration and entry to practice qualification requirements. The Council on Chiropractic Education Australasia is the chiropractic accrediting body in Australia and accredits two Bachelor's degrees (one of which is not accepting new enrolments) and six AQF Level 9 qualifications. Therefore, it is submitted, in order to graduate and be eligible to register and practice as a Chiropractor, a person is required to hold both a Bachelor's and Master's degree and that students from these institutions are ineligible to register and practice without the attainment of both.

**[64]** Having regard to these submissions, we consider that the AQF Level 7 degree is effectively an outlier for this profession. Accordingly, we consider that AQF Level 9 should be the Standard Minimum Qualification for Chiropractor. We consider that this approach should provide the clarity for employers sought by the ACA.

*Medical Imaging Technologist including Medical Radiographer, Magnetic Resonance Imaging Technologist, and Radiation Therapist*

**[65]** The draft determination identified AQF Levels 7, 8 and 9 as the Standard Minimum Qualification/s for a Medical Imaging Technologist including a Medical Radiographer, Magnetic Resonance Imaging Technologist and Radiation Therapist. The HSU/ACTU submit that Radiation Therapist should be categorised separately from Medical Radiographer and Magnetic Resonance Imaging Technologist and renamed Radiation Therapist/Radiation Therapy Technologist.

**[66]** The ADIA submits that Schedule B should refer only to AQF Level 7 for a Medical Radiographer and Magnetic Resonance Imaging Technologist. It submits that there are 29 courses below AQF Level 7 that are no longer offered but remain recognised for AHPRA registration, 26 Bachelor's Degrees (AQF Level 7), 11 degrees at AQF Level 8 and three degrees at AQF Level 9. In relation to the three AQF Level 9 degrees it submits that one relates to Sonography and two are designed for individuals with a previous Bachelor's degree in any (including non-health) discipline.

**[67]** In relation to Medical Radiographers, the ADIA submits that they are recognised under the National Registration and Accreditation Scheme, overseen by AHPRA. Specific programs of study are accredited for this purpose. However, a Magnetic Resonance Imaging Technologist does not require separate registration and will typically commence work as a registered radiographer before completing additional training to operate MRI machines and conduct diagnostic imaging. It is said that this additional training does not necessarily involve a formal AQF qualification.

**[68]** No other party has made a submission that the proposed AQF levels should be altered for this class of Health Professional. Based on the submissions of ADIA and the information provided regarding various AQF Levels 8 and 9 courses we are satisfied that these degrees are effectively outliers and not standard entry pathways for Radiographers and Magnetic Resonance Imaging Technologists. The Standard Minimum Qualification for Medical Radiographer and Magnetic Resonance Imaging Technologist will be AQF Level 7.

[69] The ADIA also submits that Radiation Therapists primarily work in the delivery of radiation for cancer treatment and are, accordingly, a different health professional from Medical Radiographers and Magnetic Resonance Imaging Technologists, who work in the diagnostic field. The HSU/ACTU agree that Radiation Therapy/Radiation Therapy Technologist is a distinct occupation. This is reflected by AHPRA having three distinct areas of practice-differentiating between diagnostic radiography, radiation therapy and nuclear medicine technology. The ADIA does not make any submissions regarding the appropriate Standard Minimum Qualification for inclusion in Schedule B of the HPSS Award.

[70] We are satisfied that a Radiation Therapist should now be referred to as ‘Radiation Therapist/Radiation Therapy Technologist’ and separately identified in Schedule B. The HSU/ACTU submit that AHPRA currently accredits nine programs of study which relate to the profession of Radiation Therapy/Radiation Therapy Technology — four of these are Bachelor’s degrees (one of which is on ‘teach-out’, meaning it is no longer offered to prospective students), four are Bachelor Honours’ degrees, and one is a Master’s degree. Accordingly, it submits that Schedule B should refer to AQF Levels 7, 8 and 9. Given the small size of this group and the small number of qualifications we intend to record the Standard Minimum Qualification/s for a Radiation Therapist/Radiation Therapy Technologist as AQF Levels 7, 8 and 9 in Schedule B of the HPSS Award.

#### *Nuclear Medicine Technologists*

[71] The draft determination identified AQF Levels 7 and 8 as the Standard Minimum Qualification/s for a Nuclear Medicine Technologist. The ADIA submits that Schedule B should refer only to AQF Level 7. It submits that there are 16 courses accredited by AHPRA for registration. These include eight Bachelor’s degrees (AQF Level 7) of which two have optional Honours programs associated with another accredited Bachelor’s degree (AQF Level 8). In addition, seven are below AQF Level 7 but are no longer offered to commencing students. One Graduate Diploma at AQF Level 8 is also no longer offered. No other party has made a submission that the proposed AQF levels should be altered for this health profession, and the HSU/ACTU submits that Schedule B should continue to refer to AQF Levels 7 and 8. Current information obtained from the list of accredited programs of study on the Medical Radiation Practice Board website and the relevant university websites discloses that there are currently only four degrees being offered across AQF Levels 7 and 8.<sup>23</sup> Given the small size of this group and the small number of qualifications, the Standard Minimum Qualification for a Nuclear Medicine Technologist will remain as AQF Levels 7 and 8.

#### **Other substantive issues raised by the parties regarding the draft determination**

##### *Progression for casual and part-time employees*

[72] Several parties, including the ADIA, Australian Pathology, Healthscope and the Ai Group, submitted that the HPSS Award should include provisions addressing the progression of part-time and casual employees through the new classification structure, including the basis upon which service is to be calculated for such employees. Several parties consider that clause 17.1 of the HPSS Award should be retained. Australian Pathology proposes that a

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<sup>23</sup> [Medical Radiation Practice Board of Australia - Accredited programs of study](#) (accessed 13 April 2026).

modified version of clause 17.1 be included in the HPSS Award. These submissions, if implemented, would mean in effect that part time and casual employees will not progress through the classification structure until they have achieved 1824 hours of similar experience to a full-time employee.

[73] In our December decision we determined that clause 17.1 of the current HPSS Award would be deleted. Having considered the submissions of the parties, we confirm that view. Whilst Australian Pathology draws our attention to clause 16.1 of the HPSS Award, which continues to apply to Support Services staff covered by the HPSS Award, we note that only Support Services staff classified at Levels 8 and 9 (which do not apply to pathology collectors or dental assistants) are affected by clause 16.1 as these are the only classifications where there is movement between pay points in a level. We made no findings regarding the employees covered by these levels that would require us to amend clause 16.1.

[74] We reiterate our previous view that we do not consider that clause 17.1, as is or as proposed to be modified by Australian Pathology, will be relevant to the new structure for Health Professionals. Further, we hold real concerns that the practical reality of such a clause is that it creates a real barrier for progression and pay increases for female health professionals. The overwhelming majority of health professionals working part-time hours are women,<sup>24</sup> and thus clause 17.1 would disproportionately affect female employees.

#### *Funding, Pricing and Taxation*

[75] Many of the interested parties to these proceedings raised various concerns regarding taxation structures<sup>25</sup>, pricing and funding models. We have considered these submissions and determined that these matters are beyond the Commission's control. We have determined not to change the approach identified in the April decision.

#### *Annual Wage Review Increases*

[76] We reject any submission that the increases to minimum rates of pay in the HPSS Award should be absorbed into future Annual Wage Review increases. If this would occur, the rectification of gender-based undervaluation which we intend to achieve would be substantially vitiated. Annual Wage Review increases do not have the purpose of addressing gender-based undervaluation in specific industries or occupations.

#### *Delayed Implementation Date*

[77] Numerous parties argued, given the passage of time and the complexity of the transitional arrangements, that the implementation of the new classification structure and rates should be delayed until after 30 June 2026. Healthscope submitted that implementation should be delayed for six months with a one-off back payment to be ordered based on any increased rate to apply from 30 June 2026. Active Ability submits that the implementation of the new structure and rates should be slowed with more time between the final determination varying the HPSS Award being 'released' and the first salary increment being applied. The Ai Group

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<sup>24</sup> Table 3 of the [Information note](#) contains information regarding part-time employees.

<sup>25</sup> Including similar issues to those addressed at [19] of the Statement.

supports additional time being permitted to facilitate the new classification structure and rates on the basis that it is doubtful that employers will have sufficient time to implement the changes prior to 30 June 2026.

[78] The ADIA submits that there is limited time before the end of June for employers to conduct the translation work required to ensure employees are correctly classified under the new structure and also to allow employers with enterprise agreements to do the due diligence required to assess the HPSS Award against their agreement/s and ensure compliance with the FW Act.

[79] We anticipate that the union parties to these proceedings would oppose any delay in the implementation of the new classification structure and rates. The Oral Health Association of Australia, which describes itself as the national peak body representing oral health practitioners argued that the five-year implementation timeframe period should be shortened so as to allow the earlier rectification of gender-based undervaluation. It submits that an extended phasing timetable risks diminishing the real impact of the adjustments, as increases may be absorbed by inflation and CPI movements.

[80] In our consideration of the operative date for commencement of the new classification structure and minimum rates of pay for health professionals, it is imperative that we carefully balance the need to rectify the undervaluation that we have identified with the need to do this in a way which is operationally achievable and allows employers to meet their compliance obligations. Ultimately, we consider that employer parties may require further time to obtain the necessary information regarding some of their employees' qualifications and the work that they are performing and implement the new structure including identifying the appropriate translations for current employees and ensuring compliance with the FW Act. However, we consider that our original phase-in period remains appropriate. Accordingly, we have determined that the new classification structure and first stage of pay rates will commence on 1 October 2026. Subsequent increases will continue to be implemented in accordance with the timetable established by the December decision — that is from 30 June in each of 2027, 2028, 2029 and 2030.

[81] We are satisfied, for the purpose of s 166(2) of the FW Act, that these operative dates are appropriate having regard to the considerations we have earlier identified. We are also satisfied that the minimum wage rates which will be established by the determination we will make are justified by work value reasons, within the meaning of s 157(2A), for the reasons set out in the April decision.

### **Drafting issues raised by the parties**

[82] The parties have raised the following drafting issues:

- (a) What classification and rate of pay should apply where a person completes a subsequent degree?<sup>26</sup>

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<sup>26</sup> Ethos Health submission, 19 March 2026 3.

- (b) What classification and rate of pay should apply where a person holds qualifications obtained outside of Australia?<sup>27</sup>
- (c) Should the classification structure refer to ‘experience’ or ‘industry experience’?<sup>28</sup>
- (d) Whether the phased in rates contained in the Appendix to the Statement have been correctly calculated;<sup>29</sup>
- (e) Whether the terminology of ‘dietician’ or ‘dietitian’ and ‘Genetics Counsellor’ or ‘Genetic Counsellor’ should be adopted;<sup>30</sup> and
- (f) Whether Schedules A and B should refer to ‘indicative’ health professionals.<sup>31</sup>

*Drafting issue (a) — What is the classification and rate of pay where a person completes a second or subsequent degree?*

**[83]** Ethos Health submits that the draft determination is clear that the awarding of a second or subsequent degree that is (a) in the employee’s field of practice and (b) related to their role may justify a reclassification of their assigned Level, from 1 to 2, or 2 to 3, depending on their responsibilities. However, it submits that the draft determination is not clear regarding whether the award of a second or subsequent degree in the employee’s field of practice justifies a step up in the AQF level against which the employee’s pay is assessed. They provide an example of a graduate Level 1 Physiotherapist who enters their profession with an AQF Level 7 qualification and is paid on that basis and subsequently completes a Master of Sports Physiotherapy by coursework as their second degree. Its concern is that the draft determination is not clear as to whether an employer would have to pay their current Level 1 employee, who is now a Master’s-degree qualified physiotherapist, the rates in clause 17.1(c) that apply to AQF Level 7 or those in clause 17.1(e) that apply to an AQF Level 9.

**[84]** The provisions in the draft determination shall be amended to clarify the intention of the provisions. Level 1 employees will be paid according to the qualification identified in Schedule B or the qualification held (in certain circumstances) at the time of commencement with an employer and the employee’s years of experience as a health professional at Level 1. They will then move through that level according to their further years of experience. There is no provision in the HPSS Award that would provide for an increase in pay for an individual who obtains an additional qualification unless that justifies a reclassification of their assigned level to a higher level within the classification structure. The principle underlying the structure of Level 1 is that the Standard Minimum Qualification for each profession is intended to be a proxy for the profession’s work value relative to the other professions; it is not intended to be personal to the individual except in the limited cases where no Standard Minimum Qualification can be identified.

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<sup>27</sup> HRfHL submission, 20 March 2026 6.

<sup>28</sup> HSU/ACTU submission, 23 March 2026 [118]–[120].

<sup>29</sup> Healthscope submission, 23 March 2026 [24]–[26].

<sup>30</sup> HSU/ACTU submission, 23 March 2026 [116]–[117].

<sup>31</sup> ASU submission, 24 March 2026 [6].

*Drafting issue (b) — What is the rate of pay or classification where a person holds qualifications obtained outside of Australia?*

**[85]** HRfHL considers that the drafting of the HPSS Award should make clear the basis upon which overseas-qualified practitioners will be classified. It submits, by way of example, that some overseas-qualified employees practice under limited registration granted by AHPRA while they complete a period of supervised practice and competency assessment before receiving unrestricted registration.

**[86]** We consider that clause A.2.1 in the draft determination makes it plain that a Level 1 employee must meet the requirements to practice or work in their profession including, where applicable, under the National Registration and Accreditation Scheme, or as otherwise set by the relevant professional body for their profession. This is effectively the same as the current HPSS Award definition. That is, if an overseas-qualified health professional meets this definition then they should be classified and paid as a Level 1 employee. We do, however, consider that the language from the current HPSS Award clause which provides for an employer to classify an employee as a Level 1 employee if they hold ‘such qualification as is deemed acceptable by the employer’ should be retained.

**[87]** HRfHL also queries whether the terms of the draft determination make clear the approach to progression where a practitioner works under limited registration (generally a period of supervised practice), regardless of prior overseas experience. We consider that, provided that provisional registration or limited registration meets the criteria for a Level 1 health professional in their 1st year, then this would be the appropriate classification. Progression would then be based on years of experience. Whether experience obtained overseas would be considered to be experience as a health professional would likely be a matter that would be determined by each professional body, National Board and/or AHPRA for the purpose of registration. We do not propose to amend the wording of the draft determination to deal with this issue.

*Drafting issue (c) — Should the HPSS Award refer to ‘experience’ or ‘industry experience’?*

**[88]** The HSU/ACTU submits that various references to ‘years’ experience’ or ‘years of experience’ or ‘years or more experience’ in the HPSS Award should be amended to refer to ‘industry experience’, in order to make it plain that the concept or language of ‘experience’ captures an employee’s experience generally rather than an employee’s experience with a particular employer. It submits, by way of illustrative example, that a Level 1 health professional who has gained, for example, four years’ experience as a health professional with one employer before moving to a new employer would not start again at Level 1 – 1st year with the new employer, but would have their previous relevant industry experience counted and be classified at Level 1 – 4th-6th year.

**[89]** We consider it appropriate to make changes to make this clear at clauses 17.1, A.2.1 and A.2.2(b) and (c). These will, however, refer to ‘years of experience in the profession’ or a variant thereof as opposed to ‘industry experience’. However, we do not consider that this amendment is necessary to be made to clause J.3.1 as this clause already makes it clear that classification will be based on ‘their years of experience in that profession’. It is clear that this is not referring to experience with a particular employer.

*Drafting issue (d) — Are the rates contained within the Appendix to the Statement correct?*

[90] Healthscope has identified some rates which it considers to be incorrect in the Appendix to the Statement.<sup>32</sup> We have considered these submissions, the methodology applied and the rates in the Appendix and formed the view that the rates are correct. Healthscope's calculations have not taken into account the rounding of the 'average of incoming rates' prior to applying the initial 5 per cent increase. For further context, the methodology used in the draft determination involves first rounding the average of the previous rates before applying the initial phase, with each additional phase also rounded. This rounding methodology is also consistent with the approach adopted in relation to the *Nurses Award 2020* (AM2021/63).

*Drafting issue (e) — Should the HPSS Award refer to 'dietician' or 'dietitian' and 'Genetics Counsellor' or 'Genetic Counsellor'?*

[91] We consider it appropriate to change these references in the HPSS Award to 'Dietitian' (as earlier discussed) and 'Genetic Counsellor'.

*Drafting issue (f) — Should both Schedules A and B refer to 'indicative' health professions?*

[92] The ASU directs the Expert Panel's attention to a submission by ABI and the Ai Group made in respect of the *Social, Community, Home Care and Disability Services Industry Award 2010* (SCHADS Award) that social workers, youth workers, welfare workers, counsellors and community development workers are, subject to them being eligible for professional registration, in fact caught by the HPSS Award. The ASU submits that this is incorrect.

[93] The ASU does not contend that any amendment to Schedule B is necessary to address this. Rather, it is concerned that any amendment made to the HPSS Award not 'fuel this ersatz controversy' by inserting a reference to a particular qualification which suggests that, rather than it being merely indicative, all persons holding the said qualification are covered by the HPSS Award to the exclusion of all other awards regardless of the nature of their particular job. Accordingly, the ASU supports the retention of the term 'indicative' in Schedule A.2 of the HPSS Award and suggests that it be inserted, where grammatically appropriate, into Schedule B.1 as well.

[94] We do not propose to resolve this controversy, if there is one, by this decision (nor is the ASU asking us to do so). We do not consider it necessary to amend the prefatory words of Schedule B.1 to include the wordage 'indicative'. The language used in Schedule A.2 makes it clear that the list of health professionals in Schedule B is indicative only and not exhaustive.

### **Other drafting issues**

[95] No party made submissions regarding the translation tables contained in clause J.3.1 of the draft determination. On review, we have decided to include additional translation tables at clauses J.3.1(c), J.3.1(d), J.3.1(g), J.3.1(h), and J.3.1(j) to J.3.1(l) of the determination. We have also amended the descriptors in J.3.1(a), J.3.1(b) and J.3.1(i). The additional translations relate

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<sup>32</sup> Healthscope submission, 23 March 2026 [24]–[26].

to potentially more uncommon translations. However, these have been included to assist employers and employees with the translation process. Related amendments have also been made to include retained minimum rates of pay in clause J.3.3 to reflect the additional translation tables. The method of calculation for the implementation of the new classification structure and phase in of the new rates of pay has not changed to include these additional translations as they are likely to be outlier examples and if included may create unintended outcomes for the purpose of phasing in.

### **Modern awards objective and minimum wages objective**

[96] As held at [161] of the December decision<sup>33</sup>, we are satisfied that the variations to the HPSS Award in respect of health professionals are necessary to achieve the modern awards objective in s 134(1), as required by s 138. We have considered the submissions filed by the parties in response to the Statement and draft determination and confirm this conclusion. For the modern award safety net to be ‘fair and relevant’ (s 134(1)) and for the minimum wage safety net to be ‘fair’ (s 284(1)), we consider that it is fundamental that modern award minimum wage rates must properly reflect work value and their determination must be free of assumptions based on gender. We also confirm that we consider that the variations are consistent with the achievement of the minimum wages objective in s 284(1) of the FW Act.

[97] A copy of the final version of the determination varying the HPSS Award to implement the revised classification structure for health professionals and the first phase of the changes to minimum wage rates, and the drafting variations we have discussed is annexed to this decision. A determination will be published following the Annual Wage Review 2026, in order to incorporate any changes to the rates of pay which may flow from that case.



PRESIDENT

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<sup>33</sup> [161] of the December Decision.

**Annexure: Copy of final determination varying the *Health Professionals and Support Services Award 2020***

## **DETERMINATION**

*Fair Work Act 2009*

s.157—FWC may vary etc. modern awards if necessary to achieve modern awards objective

### **Gender-based undervaluation – priority awards review**

(AM2024/20)

### **HEALTH PROFESSIONALS AND SUPPORT SERVICES AWARD 2020**

[MA000027]

Health and welfare services

JUSTICE HATCHER, PRESIDENT  
VICE PRESIDENT ASBURY  
DEPUTY PRESIDENT O’NEILL  
DEPUTY PRESIDENT SLEVIN  
DEPUTY PRESIDENT GRAYSON

SYDNEY, XX MONTH 2026

*Gender-based undervaluation – priority awards review – Health Professionals and Support Services Award 2020.*

A. Further to the decision issued by the Fair Work Commission on 24 December 2025 [2025 FWCFB 297] and 25 May 2026 [2026 FWCFB 123], the above award is varied as follows:

1. By deleting the words “Health Professional employee—level 1 pay point 2 in clause 17.2” appearing in the definition of standard rate in clause 2 and inserting “Health Professional employee—Level 1—AQF 7—1st year in clause 17.1(c)”.
2. By deleting clause 17—Minimum rates for Health Professional employees and inserting the following:

#### **17. Minimum rates for Health Professional employees**

##### **17.1 Health Professional employee—Level 1**

An employer must pay a Health Professional employee—Level 1 the following minimum rates of pay in accordance with the applicable Australian Qualifications Framework (AQF) level required by clause B.2 of Schedule B—Common Health Professionals and Standard Minimum Qualifications, and the employee’s years of experience in the profession at Level 1.

**(a) AQF Level 5**

<b>Employee classification</b>	<b>Minimum weekly rate (full-time employee)</b>	<b>Minimum hourly rate</b>
	<b>\$</b>	<b>\$</b>
AQF Level 5—1st year	1176.80	30.97
AQF Level 5—2nd – 3rd year	1249.50	32.88
AQF Level 5—4th – 6th year	1361.30	35.82
AQF Level 5—7th year+	1471.40	38.72

NOTE 1: See clause J.3 for the minimum rate of pay applicable to an employee who was classified as a Health Professional employee under this award on 30 September 2026.

NOTE 2: See Schedule C—Summary of Hourly Rates for a summary of hourly rates of pay including overtime and penalty rates.

**(b) AQF Level 6**

<b>Employee classification</b>	<b>Minimum weekly rate (full-time employee)</b>	<b>Minimum hourly rate</b>
	<b>\$</b>	<b>\$</b>
AQF Level 6—1st year	1176.80	30.97
AQF Level 6—2nd – 3rd year	1249.50	32.88
AQF Level 6—4th – 6th year	1416.00	37.26
AQF Level 6—7th year+	1584.00	41.68

NOTE 1: See clause J.3 for the minimum rate of pay applicable to an employee who was classified as a Health Professional employee under this award on 30 September 2026.

NOTE 2: See Schedule C—Summary of Hourly Rates for a summary of hourly rates of pay including overtime and penalty rates.

**(c) AQF Level 7**

<b>Employee classification</b>	<b>Minimum weekly rate (full-time employee)</b>	<b>Minimum hourly rate</b>
	<b>\$</b>	<b>\$</b>
AQF Level 7—1st year	1249.50	32.88
AQF Level 7—2nd – 3rd year	1345.10	35.40
AQF Level 7—4th – 6th year	1494.40	39.33
AQF Level 7—7th year+	1612.90	42.44

NOTE 1: See clause J.3 for the minimum rate of pay applicable to an employee who was classified as a Health Professional employee under this award on 30 September 2026.

NOTE 2: See Schedule C—Summary of Hourly Rates for a summary of hourly rates of pay including overtime and penalty rates.

**(d) AQF Level 8**

<b>Employee classification</b>	<b>Minimum weekly rate (full-time employee)</b>	<b>Minimum hourly rate</b>
	<b>\$</b>	<b>\$</b>
AQF Level 8—1st year	1276.50	33.59
AQF Level 8—2nd – 3rd year	1379.40	36.30
AQF Level 8—4th – 6th year	1512.90	39.81
AQF Level 8—7th year+	1643.40	43.25

NOTE 1: See clause J.3 for the minimum rate of pay applicable to an employee who was classified as a Health Professional employee under this award on 30 September 2026.

NOTE 2: See Schedule C—Summary of Hourly Rates for a summary of hourly rates of pay including overtime and penalty rates.

(e) **AQF Level 9**

<b>Employee classification</b>	<b>Minimum weekly rate (full-time employee)</b>	<b>Minimum hourly rate</b>
	<b>\$</b>	<b>\$</b>
AQF Level 9—1st year	1379.40	36.30
AQF Level 9—2nd – 3rd year	1475.10	38.82
AQF Level 9—4th – 6th year	1584.00	41.68
AQF Level 9—7th year+	1675.40	44.09

NOTE 1: See clause J.3 for the minimum rate of pay applicable to an employee who was classified as a Health Professional employee under this award on 30 September 2026.

NOTE 2: See Schedule C—Summary of Hourly Rates for a summary of hourly rates of pay including overtime and penalty rates.

**17.2 Health Professional employee—Levels 2, 3 and 4**

<b>Employee classification</b>	<b>Minimum weekly rate (full-time employee)</b>	<b>Minimum hourly rate</b>
	<b>\$</b>	<b>\$</b>
Level 2.1	1857.20	48.87
Level 2.2	1893.30	49.82
Level 3	1893.30	49.82
Level 4	2385.80	62.78

NOTE 1: See clause J.3 for the minimum rate of pay applicable to an employee who was classified as a Health Professional employee under this award on 30 September 2026.

NOTE 2: See Schedule C—Summary of Hourly Rates for a summary of hourly rates of pay including overtime and penalty rates.

3. By deleting clause A.2 and inserting the following:

## **A.2 Health Professional employees—definitions**

An indicative list of common health professionals which are covered by the definitions is contained in Schedule B—Common Health Professionals and Standard Minimum Qualifications.

### **A.2.1 Health Professional employee—Level 1**

Level 1 is an employee who meets the requirements to practice or work in their profession including, where applicable, under the National Registration and Accreditation Scheme, or as set by the relevant professional body for their profession or who holds such qualification deemed acceptable by the employer.

An employee will be classified in accordance with the applicable Australian Qualifications Framework (AQF) level in Schedule B—Common Health Professionals and Standard Minimum Qualifications, and the employee's years of experience in the profession at Level 1.

#### **(a) AQF Level 5**

- (i)** AQF Level 5—1st year
- (ii)** AQF Level 5—2nd – 3rd year
- (iii)** AQF Level 5—4th – 6th year
- (iv)** AQF Level 5—7th year+

#### **(b) AQF Level 6**

- (i)** AQF Level 6—1st year
- (ii)** AQF Level 6—2nd – 3rd year
- (iii)** AQF Level 6—4th – 6th year
- (iv)** AQF Level 6—7th year+

#### **(c) AQF Level 7**

- (i)** AQF Level 7—1st year
- (ii)** AQF Level 7—2nd – 3rd year
- (iii)** AQF Level 7—4th – 6th year

- (iv) AQF Level 7—7th year+
- (d) **AQF Level 8**
  - (i) AQF Level 8—1st year
  - (ii) AQF Level 8—2nd – 3rd year
  - (iii) AQF Level 8—4th – 6th year
  - (iv) AQF Level 8—7th year+
- (e) **AQF Level 9**
  - (i) AQF Level 9—1st year
  - (ii) AQF Level 9—2nd – 3rd year
  - (iii) AQF Level 9—4th – 6th year
  - (iv) AQF Level 9—7th year+

NOTE: See clause J.3 for the classification applicable to an employee who was classified as a Health Professional employee under this award on 30 September 2026.

**A.2.2 Health Professional employee—Level 2—Senior Clinician, Specialist, Supervisor or Educator**

- (a) A Level 2—Senior Clinician, Specialist, Supervisor or Educator is a health professional who performs the following role(s) and duties:
  - (i) A **Senior Clinician**—works directly with patients in a clinical area of their profession that requires specialist knowledge or depth of experience and/or provides clinical guidance and direction to less experienced employees as needed. Such an employee may have obtained a post-graduate qualification and/or perform advanced practice work and/or have completed training which may involve credentialing relevant to their profession; **or**
  - (ii) A **Specialist**—performs duties within or across one or more areas of expertise. These areas may include research or quality assurance and control; **or**
  - (iii) A **Supervisor**—required to provide supervision on a day-to-day basis to other health professionals, other employees (such as allied health assistants), and/or students; **or**
  - (iv) An **Educator**—accountable for the assessment, planning, implementation and evaluation of education and staff development programs.

**(b) Level 2.1**

A Level 2—Senior Clinician, Specialist, Supervisor or Educator is classified at Level 2.1 if they have less than 5 years' experience in the profession performing the role(s) and duties at Level 2.

**(c) Level 2.2**

A Level 2—Senior Clinician, Specialist, Supervisor or Educator is classified at Level 2.2 if they have 5 years or more experience in the profession performing the role(s) and duties at Level 2.

NOTE: See clause J.3 for the classification applicable to an employee who was classified as a Health Professional employee under this award on 30 September 2026.

**A.2.3 Health Professional employee—Level 3—Advanced Clinician, Senior Specialist or Section Manager**

A Level 3—Advanced Clinician, Senior Specialist or Section Manager is a health professional who has been appointed to perform the following role(s) and duties:

- (a) An Advanced Clinician**—a specialist in (a) clinical area(s) of their profession and has extensive levels of specialist knowledge and/or is a lead clinician/clinical lead who has extensive levels of knowledge across their profession; **or**
- (b) A Senior Specialist**—holds accountability for educational, research and/or quality assurance and control. Such an employee may have responsibility for leading a team; **or**
- (c) A Section Manager**—has responsibility for managing the activities of, and providing leadership, coordination and support to a specified group or team in an area, section or part of a department or service of the employer and may be accountable for ensuring budgets are met and/or the expenditure of set resources.

NOTE: See clause J.3 for the classification applicable to an employee who was classified as a Health Professional employee under this award on 30 September 2026.

**A.2.4 Health Professional employee—Level 4—Manager**

A Level 4—Manager is a health professional who has been appointed as a manager and who:

- (a)** has a proven record of achievement at a senior level;
- (b)** has the capacity to allocate resources, set priorities and ensure budgets are met within a large and complex organisation;

- (c) may be responsible to the executive for providing effective services and ensuring budget/strategic targets are met;
- (d) manages staff where required; and
- (e) is expected to develop/implement and deliver strategic business plans which increase the level of care to customers within a budget framework.

NOTE: See clause J.3 for the classification applicable to an employee who was classified as a Health Professional employee under this award on 30 September 2026.

4. By deleting Schedule B—List of Common Health Professionals and inserting the following:

### **Schedule B—Common Health Professionals and Standard Minimum Qualifications**

- B.1** Schedule B—Common Health Professionals and Standard Minimum Qualifications lists the standard minimum qualification or qualifications required for entry into common health professions according to the Australian Qualifications Framework (AQF) levels criteria.
- B.2** An employee will be classified on commencement with an employer as a Health Professional employee—Level 1—AQF Level 5, AQF Level 6, AQF Level 7, AQF Level 8 **or** AQF Level 9 in clause A.2.1 according to:
- (a) The AQF level listed for their profession in the table in clause B.3, where only one AQF level is listed; **or**
  - (b) Where more than one AQF level is listed for their profession in the table in clause B.3:
    - (i) the AQF level of the qualification held by the employee and listed in the table; **or**
    - (ii) where clause B.2(b)(i) does not apply as the AQF level held by the employee is not listed, the AQF level of the qualification listed in the table which is closest to the qualification held by the employee **and** required for entry into their profession; **or**
  - (c) Where their profession is not listed in the table in clause B.3, the AQF level of the standard minimum qualification required for entry into that profession or where no standard minimum qualification exists, the AQF level of the qualification held by the employee; **or**
  - (d) The AQF level of the qualification required by the employer if it is higher than the level identified in clauses B.2(a), B.2(b) or B.2(c).

**B.3 Common Health Professionals and Standard Minimum Qualifications**

<b>Profession</b>	<b>AQF Level</b>
Acupuncturist	AQF Level 7
Aromatherapist	AQF Level 5
Art Therapist	AQF Level 9
Audiologist	AQF Level 9
Biomedical Engineer	AQF Level 8
Biomedical Technologist	AQF Level 5
Cardiac Technologist (not performing echocardiography). Where performing echocardiography—refer to the Sonographer standard minimum qualification.	AQF Level 7
Child Psychotherapist	AQF Level 9
Chiropractor	AQF Level 9
Client Advisor/Rehabilitation Consultant	AQF Level 7 AQF Level 8 AQF Level 9
Clinical Perfusionist	AQF Level 9
Community Development Worker	AQF Level 5 AQF Level 7
Counsellor	AQF Level 5 AQF Level 6 AQF Level 7 AQF Level 8 AQF Level 9
Dental Hygienist	AQF Level 7
Dental Prosthetist	AQF Level 6 AQF Level 7
Dental Therapist	AQF Level 7
Dietitian	AQF Level 7 AQF Level 8 AQF Level 9

<b>Profession</b>	<b>AQF Level</b>
Diversional Therapist/Recreation Therapist	AQF Level 7
Exercise Physiologist	AQF Level 7
Genetic Counsellor	AQF Level 9
Health Information Manager	AQF Level 7 AQF Level 8 AQF Level 9
Masseur, Remedial	AQF Level 5
Medical Imaging Technologist (MIT) (including: Medical Radiographer; Magnetic Resonance Imaging Technologist)	AQF Level 7
Medical Laboratory Technician	AQF Level 5
Medical Librarian	AQF Level 8
Medical Scientist	AQF Level 7
Music Therapist	AQF Level 9
Myotherapist	AQF Level 6
Naturopathist	AQF Level 7
Nuclear Medicine Technologist	AQF Level 7 AQF Level 8
Occupational Therapist	AQF Level 7
Oral Health Therapist	AQF Level 7
Orthoptist	AQF Level 8 AQF Level 9
Osteopath	AQF Level 9
Pharmacist	AQF Level 7
Physiotherapist	AQF Level 7
Podiatrist	AQF Level 7
Prosthetist/Orthotist	AQF Level 7 AQF Level 8
Psychologist	AQF Level 9
Radiation Therapist/Radiation Therapy Technologist	AQF Level 7 AQF Level 8

<b>Profession</b>	<b>AQF Level</b>
	AQF Level 9
Reflexologist	AQF Level 5
Research Technologist	AQF Level 7
Social Worker	AQF Level 7 AQF Level 8 AQF Level 9
Sonographer	AQF Level 8
Speech Pathologist	AQF Level 7 AQF Level 8 AQF Level 9
Welfare Worker	AQF Level 5 AQF Level 6 AQF Level 7
Youth Worker	AQF Level 5 AQF Level 6 AQF Level 7

NOTE: Physiotherapist and Myotherapist may include health professionals who have previously been known as Musculoskeletal Therapist.

5. By deleting clause C.2.1 and inserting the following:

**C.2.1 Full-time and part-time health professional employees—ordinary hours and penalty rates**

	<b>Ordinary hours</b>	<b>Between midnight Friday and midnight Sunday</b>	<b>Public holiday</b>	<b>Shiftwork<sup>1</sup></b>
	<b>% of minimum hourly rate</b>			
	<b>100%</b>	<b>150%</b>	<b>250%</b>	<b>115%</b>
	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>
<b>Health Professional employee—Level 1—AQF Level 5</b>				
AQF Level 5—1st year	30.97	46.46	77.43	35.62

	<b>Ordinary hours</b>	<b>Between midnight Friday and midnight Sunday</b>	<b>Public holiday</b>	<b>Shiftwork<sup>1</sup></b>
	<b>% of minimum hourly rate</b>			
	<b>100%</b>	<b>150%</b>	<b>250%</b>	<b>115%</b>
	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>
AQF Level 5—2nd – 3rd year	32.88	49.32	82.20	37.81
AQF Level 5—4th – 6th year	35.82	53.73	89.55	41.19
AQF Level 5—7th year+	38.72	58.08	96.80	44.53
<b>Health Professional employee—Level 1—AQF Level 6</b>				
AQF Level 6—1st year	30.97	46.46	77.43	35.62
AQF Level 6—2nd – 3rd year	32.88	49.32	82.20	37.81
AQF Level 6—4th – 6th year	37.26	55.89	93.15	42.85
AQF Level 6—7th year+	41.68	62.52	104.20	47.93
<b>Health Professional employee—Level 1—AQF Level 7</b>				
AQF Level 7—1st year	32.88	49.32	82.20	37.81
AQF Level 7—2nd – 3rd year	35.40	53.10	88.50	40.71
AQF Level 7—4th – 6th year	39.33	59.00	98.33	45.23
AQF Level 7—7th year+	42.44	63.66	106.10	48.81
<b>Health Professional employee—Level 1—AQF Level 8</b>				
AQF Level 8—1st year	33.59	50.39	83.98	38.63
AQF Level 8—2nd – 3rd year	36.30	54.45	90.75	41.75
AQF Level 8—4th – 6th year	39.81	59.72	99.53	45.78
AQF Level 8—7th year+	43.25	64.88	108.13	49.74
<b>Health Professional employee—Level 1—AQF Level 9</b>				
AQF Level 9—1st year	36.30	54.45	90.75	41.75
AQF Level 9—2nd – 3rd year	38.82	58.23	97.05	44.64

	<b>Ordinary hours</b>	<b>Between midnight Friday and midnight Sunday</b>	<b>Public holiday</b>	<b>Shiftwork<sup>1</sup></b>
	<b>% of minimum hourly rate</b>			
	<b>100%</b>	<b>150%</b>	<b>250%</b>	<b>115%</b>
	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>
AQF Level 9—4th – 6th year	41.68	62.52	104.20	47.93
AQF Level 9—7th year+	44.09	66.14	110.23	50.70
<b>Health Professional employee—Level 2</b>				
Level 2.1	48.87	73.31	122.18	56.20
Level 2.2	49.82	74.73	124.55	57.29
<b>Health Professional employee—Level 3</b>	49.82	74.73	124.55	57.29
<b>Health Professional employee—Level 4</b>	62.78	94.17	156.95	72.20

<sup>1</sup> **Shiftwork** means any shift where ordinary hours commence between 6.00 pm and 6.00 am or finish between 6.00 pm and 8.00 am as defined in clause 26.3.

6. By deleting clause C.2.2 and inserting the following:

**C.2.2 Full-time and part-time health professional employees—overtime**

	<b>Monday to Saturday</b>		<b>Sunday</b>	<b>Public holiday</b>
	<b>First 2 hours</b>	<b>After 2 hours</b>		
	<b>% of minimum hourly rate</b>			
	<b>150%</b>	<b>200%</b>	<b>200%</b>	<b>250%</b>
	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>
<b>Health Professional employee—Level 1—AQF Level 5</b>				
AQF Level 5—1st year	46.46	61.94	61.94	77.43
AQF Level 5—2nd – 3rd year	49.32	65.76	65.76	82.20
AQF Level 5—4th – 6th year	53.73	71.64	71.64	89.55
AQF Level 5—7th year+	58.08	77.44	77.44	96.80

	Monday to Saturday		Sunday	Public holiday
	First 2 hours	After 2 hours		
	% of minimum hourly rate			
	150%	200%	200%	250%
	\$	\$	\$	\$
<b>Health Professional employee—Level 1—AQF Level 6</b>				
AQF Level 6—1st year	46.46	61.94	61.94	77.43
AQF Level 6—2nd – 3rd year	49.32	65.76	65.76	82.20
AQF Level 6—4th – 6th year	55.89	74.52	74.52	93.15
AQF Level 6—7th year+	62.52	83.36	83.36	104.20
<b>Health Professional employee—Level 1—AQF Level 7</b>				
AQF Level 7—1st year	49.32	65.76	65.76	82.20
AQF Level 7—2nd – 3rd year	53.10	70.80	70.80	88.50
AQF Level 7—4th – 6th year	59.00	78.66	78.66	98.33
AQF Level 7—7th year+	63.66	84.88	84.88	106.10
<b>Health Professional employee—Level 1—AQF Level 8</b>				
AQF Level 8—1st year	50.39	67.18	67.18	83.98
AQF Level 8—2nd – 3rd year	54.45	72.60	72.60	90.75
AQF Level 8—4th – 6th year	59.72	79.62	79.62	99.53
AQF Level 8—7th year+	64.88	86.50	86.50	108.13
<b>Health Professional employee—Level 1—AQF Level 9</b>				
AQF Level 9—1st year	54.45	72.60	72.60	90.75
AQF Level 9—2nd – 3rd year	58.23	77.64	77.64	97.05
AQF Level 9—4th – 6th year	62.52	83.36	83.36	104.20
AQF Level 9—7th year+	66.14	88.18	88.18	110.23
<b>Health Professional employee—Level 2</b>				
Level 2.1	73.31	97.74	97.74	122.18
Level 2.2	74.73	99.64	99.64	124.55
<b>Health Professional employee—Level 3</b>	74.73	99.64	99.64	124.55

	Monday to Saturday		Sunday	Public holiday
	First 2 hours	After 2 hours		
	<b>% of minimum hourly rate</b>			
	<b>150%</b>	<b>200%</b>	<b>200%</b>	<b>250%</b>
	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>
<b>Health Professional employee—Level 4</b>	94.17	125.56	125.56	156.95

7. By deleting clause C.2.3 and inserting the following:

### **C.2.3 Casual health professional employees—ordinary hours and penalty rates**

	Ordinary hours	Saturday and Sunday	Public holiday	Shiftwork <sup>1</sup>
	<b>% of minimum hourly rate</b>			
	<b>125%</b>	<b>175%</b>	<b>275%</b>	<b>140%</b>
	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>
<b>Health Professional employee—Level 1—AQF Level 5</b>				
AQF Level 5—1st year	38.71	54.20	85.17	43.36
AQF Level 5—2nd – 3rd year	41.10	57.54	90.42	46.03
AQF Level 5—4th – 6th year	44.78	62.69	98.51	50.15
AQF Level 5—7th year+	48.40	67.76	106.48	54.21
<b>Health Professional employee—Level 1—AQF Level 6</b>				
AQF Level 6—1st year	38.71	54.20	85.17	43.36
AQF Level 6—2nd – 3rd year	41.10	57.54	90.42	46.03
AQF Level 6—4th – 6th year	46.58	65.21	102.47	52.16
AQF Level 6—7th year+	52.10	72.94	114.62	58.35
<b>Health Professional employee—Level 1—AQF Level 7</b>				
AQF Level 7—1st year	41.10	57.54	90.42	46.03
AQF Level 7—2nd – 3rd year	44.25	61.95	97.35	49.56
AQF Level 7—4th – 6th year	49.16	68.83	108.16	55.06
AQF Level 7—7th year+	53.05	74.27	116.71	59.42

	<b>Ordinary hours</b>	<b>Saturday and Sunday</b>	<b>Public holiday</b>	<b>Shiftwork<sup>1</sup></b>
	<b>% of minimum hourly rate</b>			
	<b>125%</b>	<b>175%</b>	<b>275%</b>	<b>140%</b>
	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>
<b>Health Professional employee— Level 1—AQF Level 8</b>				
AQF Level 8—1st year	41.99	58.78	92.37	47.03
AQF Level 8—2nd – 3rd year	45.38	63.53	99.83	50.82
AQF Level 8—4th – 6th year	49.76	69.67	109.48	55.73
AQF Level 8—7th year+	54.06	75.69	118.94	60.55
<b>Health Professional employee— Level 1—AQF Level 9</b>				
AQF Level 9—1st year	45.38	63.53	99.83	50.82
AQF Level 9—2nd – 3rd year	48.53	67.94	106.76	54.35
AQF Level 9—4th – 6th year	52.10	72.94	114.62	58.35
AQF Level 9—7th year+	55.11	77.16	121.25	61.73
<b>Health Professional employee— Level 2</b>				
Level 2.1	61.09	85.52	134.39	68.42
Level 2.2	62.28	87.19	137.01	69.75
<b>Health Professional employee— Level 3</b>	62.28	87.19	137.01	69.75
<b>Health Professional employee— Level 4</b>	78.48	109.87	172.65	87.89

<sup>1</sup> **Shiftwork** means any shift where ordinary hours commence between 6.00 pm and 6.00 am or finish between 6.00 pm and 8.00 am as defined in clause 26.3.

8. By deleting clause D.1.1 and inserting the following:

**D.1.1** The wage-related allowances in this award are based on the standard rate as defined in clause 2—Definitions as the minimum weekly rate for a Health Professional employee—Level 1—AQF Level 7—1st year in clause 17.1(c) = **\$1249.50**

<b>Allowance</b>	<b>Clause</b>	<b>% of standard rate</b>	<b>\$</b>	<b>Payable</b>
Heat allowance—between 40°C and 46°C <sup>1</sup>	23.2(a)(iii)	0.0464	0.58	per hour or part thereof
Heat allowance—exceeds 46°C <sup>1</sup>	23.2(a)(iii)	0.0560	0.70	per hour or part thereof
Nauseous work allowance—per hour or part thereof	23.2(b)(i)	0.0464	0.58	per hour or part thereof
Nauseous work allowance—minimum per week	23.2(b)(ii)	0.2510	3.14	per week
Occasional interpreting allowance—per occasion	23.2(c)	0.1024	1.28	per occasion
Occasional interpreting allowance—maximum per week	23.2(c)	1.1836	14.79	per week
On-call allowance, per 24 hour period or part thereof—Monday to Saturday	23.2(d)(i)	2.0128	25.15	per 24 hour period
On-call allowance, per 24 hour period or part thereof—Sunday or public holiday	23.2(d)(ii)	4.0160	50.18	per 24 hour period

<sup>1</sup>Heat allowance only payable to certain employees in accordance with clause 23.2(a)(iii).

9. By deleting the words “this award” appearing in the preamble to Schedule J—Classification Translation Arrangements and inserting “this award, and to Health Professional employees”.

10. By inserting a new clause J.3 as follows:

### **J.3 Health Professional employees**

#### **J.3.1 Previous levels 1 and 2**

An employee who was classified as a Health Professional employee at Level 1 or Level 2 under clause A.2 of this award on 30 September 2026 will be classified according to the applicable AQF level of the qualification for their profession in Schedule B—Common Health Professionals and Standard Minimum Qualifications, and their years of experience in that profession. Examples are as follows:

**(a) Employees whose applicable qualification in Schedule B—Common Health Professionals and Standard Minimum Qualifications is AQF Level 5 (with UG 2 qualification entry)**

<b>Previous classification</b>	<b>Translated classification</b>
<b>Health Professional employee— Level 1</b>	<b>Health Professional employee—Level 1—AQF Level 5</b>
Pay point 1 (UG 2 qualification)	1st year
Pay point 2	2nd – 3rd year
Pay point 3	2nd – 3rd year
Pay point 4	4th – 6th year
Pay point 5	4th – 6th year
Pay point 6	4th – 6th year
<b>Health Professional employee— Level 2</b>	
Pay point 1	7th year+
Pay point 2	7th year+
Pay point 3	7th year+
Pay point 4	7th year+

**(b) Employees whose applicable qualification in Schedule B—Common Health Professionals and Standard Minimum Qualifications is AQF Level 6 (with UG 2 qualification entry)**

<b>Previous classification</b>	<b>Translated classification</b>
<b>Health Professional employee— Level 1</b>	<b>Health Professional employee—Level 1—AQF Level 6</b>
Pay point 1 (UG 2 qualification)	1st year
Pay point 2	2nd – 3rd year
Pay point 3	2nd – 3rd year
Pay point 4	4th – 6th year

<b>Previous classification</b>	<b>Translated classification</b>
Pay point 5	4th – 6th year
Pay point 6	4th – 6th year
<b>Health Professional employee— Level 2</b>	
Pay point 1	7th year+
Pay point 2	7th year+
Pay point 3	7th year+
Pay point 4	7th year+

- (c) **Employees whose applicable qualification in Schedule B—Common Health Professionals and Standard Minimum Qualifications is AQF Level 6 (with 3 year degree entry)**

<b>Previous classification</b>	<b>Translated classification</b>
<b>Health Professional employee— Level 1</b>	<b>Health Professional employee—Level 1—AQF Level 6</b>
Pay point 2 (3 year degree entry)	1st year
Pay point 3	2nd – 3rd year
Pay point 4	2nd – 3rd year
Pay point 5	4th – 6th year
Pay point 6	4th – 6th year
<b>Health Professional employee— Level 2</b>	
Pay point 1	4th – 6th year
Pay point 2	7th year+
Pay point 3	7th year+
Pay point 4	7th year+

- (d) **Employees whose applicable qualification in Schedule B—Common Health Professionals and Standard Minimum Qualifications is AQF Level 7 (with UG 2 qualification entry)**

<b>Previous classification</b>	<b>Translated classification</b>
<b>Health Professional employee— Level 1</b>	<b>Health Professional employee—Level 1—AQF Level 7</b>

<b>Previous classification</b>	<b>Translated classification</b>
Pay point 1 (UG 2 qualification)	1st year
Pay point 2	2nd – 3rd year
Pay point 3	2nd – 3rd year
Pay point 4	4th – 6th year
Pay point 5	4th – 6th year
Pay point 6	4th – 6th year
<b>Health Professional employee— Level 2</b>	
Pay point 1	7th year+
Pay point 2	7th year+
Pay point 3	7th year+
Pay point 4	7th year+

- (e) **Employees whose applicable qualification in Schedule B—Common Health Professionals and Standard Minimum Qualifications is AQF Level 7 (with 3 year degree entry)**

<b>Previous classification</b>	<b>Translated classification</b>
<b>Health Professional employee— Level 1</b>	<b>Health Professional employee—Level 1—AQF Level 7</b>
Pay point 2 (3 year degree entry)	1st year
Pay point 3	2nd – 3rd year
Pay point 4	2nd – 3rd year
Pay point 5	4th – 6th year
Pay point 6	4th – 6th year
<b>Health Professional employee— Level 2</b>	
Pay point 1	4th – 6th year
Pay point 2	7th year+
Pay point 3	7th year+
Pay point 4	7th year+

- (f) **Employees whose applicable qualification in Schedule B—Common Health Professionals and Standard Minimum Qualifications is AQF Level 7 (with 4 year degree entry)**

<b>Previous classification</b>	<b>Translated classification</b>
<b>Health Professional employee— Level 1</b>	<b>Health Professional employee—Level 1—AQF Level 7</b>
Pay point 3 (4 year degree entry)	1st year
Pay point 4	2nd – 3rd year
Pay point 5	2nd – 3rd year
Pay point 6	4th – 6th year
<b>Health Professional employee— Level 2</b>	
Pay point 1	4th – 6th year
Pay point 2	4th – 6th year
Pay point 3	7th year+
Pay point 4	7th year+

- (g) **Employees whose applicable qualification in Schedule B—Common Health Professionals and Standard Minimum Qualifications is AQF Level 7 (with Masters degree entry)**

<b>Previous classification</b>	<b>Translated classification</b>
<b>Health Professional employee— Level 1</b>	<b>Health Professional employee—Level 1—AQF Level 7</b>
Pay point 4 (Masters degree entry)	1st year
Pay point 5	2nd – 3rd year
Pay point 6	2nd – 3rd year
<b>Health Professional employee— Level 2</b>	
Pay point 1	4th – 6th year
Pay point 2	4th – 6th year
Pay point 3	4th – 6th year
Pay point 4	7th year+

**(h) Employees whose applicable qualification in Schedule B—Common Health Professionals and Standard Minimum Qualifications is AQF Level 8 (with 3 year degree entry)**

<b>Previous classification</b>	<b>Translated classification</b>
<b>Health Professional employee— Level 1</b>	<b>Health Professional employee—Level 1—AQF Level 8</b>
Pay point 2 (3 year degree entry)	1st year
Pay point 3	2nd – 3rd year
Pay point 4	2nd – 3rd year
Pay point 5	4th – 6th year
Pay point 6	4th – 6th year
<b>Health Professional employee— Level 2</b>	
Pay point 1	4th – 6th year
Pay point 2	7th year+
Pay point 3	7th year+
Pay point 4	7th year+

**(i) Employees whose applicable qualification in Schedule B—Common Health Professionals and Standard Minimum Qualifications is AQF Level 8 (with 4 year degree entry)**

<b>Previous classification</b>	<b>Translated classification</b>
<b>Health Professional employee— Level 1</b>	<b>Health Professional employee—Level 1—AQF Level 8</b>
Pay point 3 (4 year degree entry)	1st year
Pay point 4	2nd – 3rd year
Pay point 5	2nd – 3rd year
Pay point 6	4th – 6th year
<b>Health Professional employee— Level 2</b>	
Pay point 1	4th – 6th year
Pay point 2	4th – 6th year
Pay point 3	7th year+

<b>Previous classification</b>	<b>Translated classification</b>
<b>Health Professional employee— Level 1</b>	<b>Health Professional employee—Level 1—AQF Level 8</b>
Pay point 4	7th year+

- (j) **Employees whose applicable qualification in Schedule B—Common Health Professionals and Standard Minimum Qualifications is AQF Level 9 (with 3 year degree entry)**

<b>Previous classification</b>	<b>Translated classification</b>
<b>Health Professional employee— Level 1</b>	<b>Health Professional employee—Level 1—AQF Level 9</b>
Pay point 2 (3 year degree entry)	1st year
Pay point 3	2nd – 3rd year
Pay point 4	2nd – 3rd year
Pay point 5	4th – 6th year
Pay point 6	4th – 6th year
<b>Health Professional employee— Level 2</b>	
Pay point 1	4th – 6th year
Pay point 2	7th year+
Pay point 3	7th year+
Pay point 4	7th year+

- (k) **Employees whose applicable qualification in Schedule B—Common Health Professionals and Standard Minimum Qualifications is AQF Level 9 (with 4 year degree entry)**

<b>Previous classification</b>	<b>Translated classification</b>
<b>Health Professional employee— Level 1</b>	<b>Health Professional employee—Level 1—AQF Level 9</b>
Pay point 3 (4 year degree entry)	1st year
Pay point 4	2nd – 3rd year
Pay point 5	2nd – 3rd year
Pay point 6	4th – 6th year

<b>Previous classification</b>	<b>Translated classification</b>
<b>Health Professional employee— Level 1</b>	<b>Health Professional employee—Level 1—AQF Level 9</b>
<b>Health Professional employee— Level 2</b>	
Pay point 1	4th – 6th year
Pay point 2	4th – 6th year
Pay point 3	7th year+
Pay point 4	7th year+

- (l) **Employees whose applicable qualification in Schedule B—Common Health Professionals and Standard Minimum Qualifications is AQF Level 9 (with Masters degree entry)**

<b>Previous classification</b>	<b>Translated classification</b>
<b>Health Professional employee— Level 1</b>	<b>Health Professional employee—Level 1—AQF Level 9</b>
Pay point 4 (Masters degree entry)	1st year
Pay point 5	2nd – 3rd year
Pay point 6	2nd – 3rd year
<b>Health Professional employee— Level 2</b>	
Pay point 1	4th – 6th year
Pay point 2	4th – 6th year
Pay point 3	4th – 6th year
Pay point 4	7th year+

- (m) **Employees whose applicable qualification in Schedule B—Common Health Professionals and Standard Minimum Qualifications is AQF Level 9 (with Masters degree entry)**

<b>Previous classification</b>	<b>Translated classification</b>
<b>Health Professional employee— Level 1</b>	<b>Health Professional employee—Level 1—AQF Level 9</b>
Pay point 4 (Masters degree entry)	1st year

<b>Previous classification</b>	<b>Translated classification</b>
Pay point 5	2nd – 3rd year
Pay point 6	2nd – 3rd year
<b>Health Professional employee— Level 2</b>	
Pay point 1	4th – 6th year
Pay point 2	4th – 6th year
Pay point 3	4th – 6th year
Pay point 4	7th year+

- (n) **Employees whose applicable qualification in Schedule B—Common Health Professionals and Standard Minimum Qualifications is AQF Level 9 (with PhD entry)**

<b>Previous classification</b>	<b>Translated classification</b>
<b>Health Professional employee— Level 1</b>	<b>Health Professional employee—Level 1—AQF Level 9</b>
Pay point 5 (PhD entry)	1st year
Pay point 6	2nd – 3rd year
<b>Health Professional employee— Level 2</b>	
Pay point 1	2nd – 3rd year
Pay point 2	4th – 6th year
Pay point 3	4th – 6th year
Pay point 4 (6th year)	4th – 6th year
Pay point 4 (7th year+)	7th year+

### J.3.2 Previous levels 3 and 4

An employee who was classified as a Health Professional employee at Level 3 or Level 4 under clause A.2 of this award on 30 September 2026 will be classified as follows:

<b>Previous classification</b>	<b>Translated classification</b>
<b>Health Professional employee</b>	<b>Health Professional employee</b>
Level 3 if the employee performs the following role(s) and duties:	Level 2.1

Previous classification	Translated classification
<p><b>Health Professional employee</b></p>	<p><b>Health Professional employee</b></p>
<p>(a) A <b>Senior clinician</b>—works directly with patients in a clinical area of their profession that requires specialist knowledge or depth of experience and/or provides clinical guidance and direction to less experienced employees as needed. Such an employee may have obtained a postgraduate qualification and/or perform advanced practice work and/or have completed training which may involve credentialing relevant to their profession; <b>or</b></p> <p>(b) A <b>Specialist</b>—performing duties within or across one or more of areas of expertise. These areas may include research or quality assurance and control; <b>or</b></p> <p>(c) A <b>Supervisor</b>—required to provide supervision on a day-to-day basis to other health professionals, other employees (such as allied health assistants), and/or students; <b>or</b></p> <p>(d) An <b>Educator</b>—accountable for the assessment, planning, implementation and evaluation of education and staff development programs.</p> <p>and has <b>less than 5 years’</b> experience performing these role(s) and duties.</p>	
<p>Level 3 if the employee performs the following role(s) and duties:</p> <p>(a) A <b>Senior clinician</b>—works directly with patients in a clinical area of their profession that requires specialist knowledge or depth of experience and/or provides clinical guidance and direction to less experienced employees as needed. Such an employee may have obtained a postgraduate qualification and/or perform advanced practice work and/or have completed training which may involve credentialing relevant to their profession; <b>or</b></p>	<p>Level 2.2</p>

Previous classification	Translated classification
<b>Health Professional employee</b>	<b>Health Professional employee</b>
<p>(b) A <b>Specialist</b>—performs duties within or across one or more of areas of expertise. These areas may include research or quality assurance and control; <b>or</b></p> <p>(c) A <b>Supervisor</b>—required to provide supervision on a day-to-day basis to other health professionals, other employees (such as allied health assistants), and/or students; <b>or</b></p> <p>(d) An <b>Educator</b>—accountable for the assessment, planning, implementation and evaluation of education and staff development programs.</p> <p>and has <b>5 years or more</b> experience performing these role(s) and duties.</p>	
<p>Level 3 if the employee performs the following role(s) and duties:</p> <p>(a) An <b>Advanced Clinician</b>—a specialist in (a) clinical area(s) of their profession and has extensive levels of specialist knowledge and/or is a lead clinician/clinical lead who has extensive levels of knowledge across their profession; <b>or</b></p> <p>(b) A <b>Senior Specialist</b>—holds accountability for educational, research and/or quality assurance and control. Such an employee may have responsibility for leading a team; <b>or</b></p> <p>(c) A <b>Section Manager</b>—has responsibility for managing the activities of, and providing leadership, coordination and support to a specified group or team in an area, section or part of a department or service of the employer and may be accountable for ensuring budgets are met and/or the expenditure of set resources.</p>	Level 3
Level 4	Level 4

**J.3.3 Retained minimum rates of pay**

The minimum rate of pay applicable to a Health Professional employee who was classified under this award on 30 September 2026 is the higher of:

- (a) The minimum rate of pay under this award that applies to the employee’s translated classification under clause J.3.1 or J 3.2; or
- (b) The minimum rate of pay previously applicable to the employee under this award as it was on 30 September 2026, as follows:

<b>Previous classification</b>	<b>Minimum weekly rate (full-time employee)</b>	<b>Minimum hourly rate</b>
	\$	\$
<b>Health Professional employee—level 1</b>		
Pay point 1	1120.80	29.49
Pay point 2	1164.20	30.64
Pay point 3	1215.70	31.99
Pay point 4	1257.50	33.09
Pay point 5	1369.90	36.05
Pay point 6	1418.50	37.33
<b>Health Professional employee—level 2</b>		
Pay point 1	1426.20	37.53
Pay point 2	1478.10	38.90
Pay point 3	1534.50	40.38
Pay point 4	1595.60	41.99
<b>Health Professional employee—level 3</b>		
Pay point 5	1893.30	49.82
<b>Health Professional employee—level 4</b>		
Pay point 4	2582.40	67.96

11. By updating the table of contents and cross-references accordingly.

B. This determination comes into operation on 1 October 2026. In accordance with ss 165(3) and 166(5) of the *Fair Work Act 2009* (Cth) this determination does not take effect in relation to a particular employee until the start of the employee's first full pay period that starts on or after 1 October 2026.

PRESIDENT

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