



## Gender Undervaluation – Priority Awards (AM2024/19, AM2024/20, AM2024/21, AM2024/22, AM2024/23)

### Submission cover sheet

#### Name

(Please provide the name of the person lodging the submission)

Ann Davey

#### Organisation

(If this submission is completed on behalf of an organisation or group of individuals, please provide details)

Massage & Myotherapy Australia

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#### Priority Award(s):

- Aboriginal and Torres Strait Islander Health Workers and Practitioners and Aboriginal Community Controlled Health Services Award 2020*
- Children's Services Award 2010*
- Health Professionals and Support Services Award 2020*
- Pharmacy Industry Award 2020*

- *Social, Community, Home Care and Disability Services Industry Award 2010*

## How to prepare a submission

Submissions should be emailed to [awards@fwc.gov.au](mailto:awards@fwc.gov.au). Directions set out the due dates for submissions. Directions are issued by a Member of the Commission and will be published on the [Gender undervaluation – priority awards review](#) webpage on the Commission’s website.

Make sure you use numbered paragraphs and sign and date your submission.

In your submission, provide a summary of your experience and any relevant issues and proposals. As background, you may wish to review the Commission’s [Gender pay equity research webpage](#), the [Stage 2 report: Gender pay equity research](#), and the [Annual Wage Review Decision 2023-24](#) with particular focus on paragraphs [85]-[132], and [162]-[172].

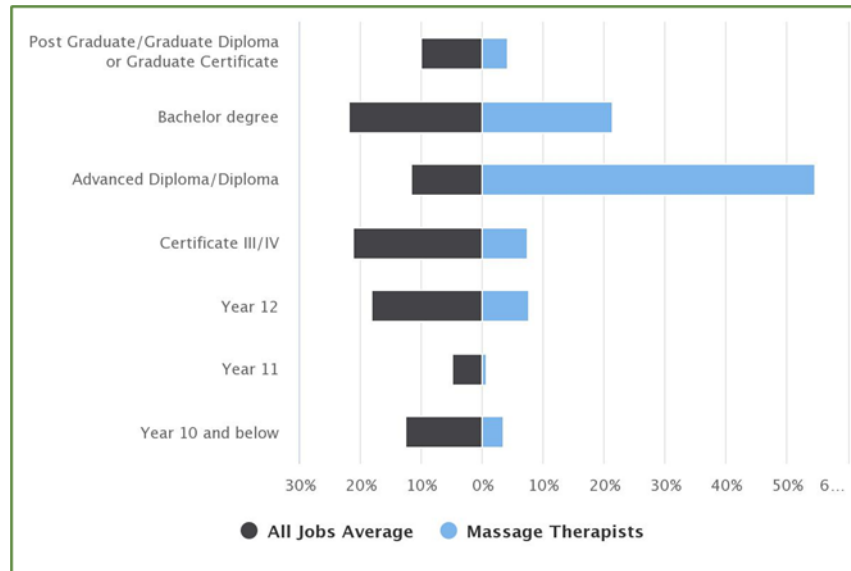
## Issues

### 3. About Australia’s Professional Massage Sector

- a. We refer to professional qualified massage therapists which includes therapists with AQF recognised qualifications as remedial massage therapists, therapeutic massage therapists or myotherapists.
- b. The professional massage sector is a female dominated sector with an employment ratio of 4:1 women to men<sup>i</sup>. This survey is consistent with other surveys dating back to 2012. Additionally, women access massage services at a ratio of 2:1 to men.<sup>ii</sup> This is not surprising because females experience a higher proportion of osteoarthritis compared with males (66% females/34% males), rheumatoid arthritis (64% females/36% males) and ‘other musculoskeletal conditions’ (52% females/48% males).<sup>iii</sup>
- c. Of the respondents to the Massage & Myotherapy 2023 Practitioners’ Survey, three-quarters (75%) have a Diploma related to massage, while 19% have an Advanced Diploma or Bachelor’s Degree, and 6% have Cert IV qualification.
  - i. The survey also shows an experienced massage therapy workforce that is readily accessible across Australia with 55% in metropolitan areas, 34% in regional areas, and 11% in rural Australia.
  - ii. Half (50%) have more than 10 years massage and myotherapy experience, while a further 20% have been working in the profession for between 6 and 10 years. Currently, the Advanced Diploma of Myotherapy is a Victorian based qualification but can be delivered in other states and territories. Around 20% of massage therapists hold this qualification or higher.
  - iii. As in other state and federal insurance schemes, eligibility necessitates the inclusion of Massage Therapists who hold a Diploma of Remedial Massage Therapy or above, as nationally recognised under the Australian Qualifications Framework.
  - iv. In 2021 Endeavour College undertook a survey of its past students as shown in Figure 1 below, which aggregated graduate data for diploma and advanced diploma qualifications. Importantly, the Endeavour College results correlate with the findings of the Massage & Myotherapy Practitioners’ Survey which reported separately on the two qualifications of remedial massage and myotherapy. Census data collected by the Australian Bureau of Statistics (ABS) reported 19,900 massage therapists as of May 2018. Combined, the three

surveys provide a reliable indication of the proportion of practitioners holding the various qualifications within the professional massage sector, and the size of the workforce and their availability and accessibility to the community.

- v. Figure 1. Endeavour College 2021 Survey of Graduate Qualifications. The report, undertaken by Australian Online Research, reported an estimated 15,000 professional massage therapists and myotherapists for whom massage services was their primary source of income..



d.

4. Figure 1. Endeavour College 2021 Survey of Graduate Qualifications.

- a. Professional massage therapists are members of the following professional massage associations such as [Massage & Myotherapy Australia](#), [Australian Natural Therapists Association](#), [Australian Traditional Medicine Society](#), or [Myotherapy Association Australia](#).
- b. In line with other State and Federal insurance schemes, to be eligible as a Provider under the prescribed rules, professional massage therapists can demonstrate competency in delivering health services within the principles of the Clinical Framework, as accredited members of a professional association.
  - i. Requirements to become an accredited member of a professional association for massage therapists mirror AHPRA registration requirements. Professional massage therapists and myotherapists must adhere to a [Professional Code of Ethics and Standards of Practice](#) which are similar to AHPRA-registered health practitioners' [Codes and Guidelines](#). Additionally, [Complaints and concerns](#) can be raised about AHPRA-registered practitioners, as they can be about professional massage therapists through an independent [National Ethics Committee](#). This is underpinned by legislation concerning the [National Code of Conduct for Health Care Workers](#). This Code of Conduct includes supporting state legislation and state and federal health ombudsmen with cross-jurisdictional information-sharing powers.
  - ii. Like registered health practitioners, membership arrangements operated by various professional Associations include:
    - set qualification and probity standards for membership
    - accredited training programs for membership purposes
    - undergo Recency of Practice continuing professional development/education requirements
    - hold current Senior/Level 2 First Aid Qualifications
    - hold current Malpractice, Public Liability Insurance (minimum \$2,000,000)

- Criminal History Check and Working with Children/Vulnerable Persons Check in some cases
    - English language skills
  - Code of ethics that sanction members for unprofessional conduct, including withdrawal of membership in serious matters.
  - Third party complaint resolution involving a code of ethics that members must subscribe to
  - A statutory declaration, indicating that they have not been charged with or convicted of an offence of harm to a person nor been subject to disciplinary proceedings with a Private Health Fund.
- c. Massage Associations describe therapeutic and remedial massage and myotherapy as manual manipulation therapies involving the deep or shallow soft tissues of the body including muscles, tendons, and ligaments. They are used to alleviate pain and stress and improve mobility. All adjunct services such as hot stone therapy, dry needling or aromatherapy are used to augment the massage therapy experience, but they are not massage or what defines a qualified massage therapist. The conditions treated by qualified therapists include disease and injury, dysfunction and pain, and emotional issues as listed in Table 1 below:

Disease and injury	Dysfunction and pain	Emotion
palliative conditions, i.e., cancer	postural & thoracic	neural tension
muscular tears & strains	sacroiliac, lumbar & hip	tension & stress
tendonitis & tendinopathy	neck & shoulder	relaxation
surgery recovery	reduced range of motion	headaches
	reduced fitness & strength	restlessness

Table 1: Conditions for which massage therapy is applied

#### 5. Evidence of income and employment inequality

- a. The consequences of women who choose massage therapy as a profession experience significant inequality. Responses to the Massage & Myotherapy 2023 Practitioners' Survey indicate that as a female dominated sector of health a considerable latent supply of labour exists within the massage sector.
- b. The survey also indicated that professional massage therapists are actively involved in injury management and rehabilitation, managing the long-term healthcare needs of people with chronic conditions, and the relief of symptoms related to mental health:
- sports injury management & rehabilitation      76%
  - pregnancy related care      49%
  - self-directed care      47%
  - occupational injuries & rehabilitation      39%
  - mental health care      32%
  - motor vehicle accident & rehabilitation      33%
  - aged care services      28%
- c. The 2023 Survey found that less than a third of the people employed in the massage sector reported working full-time (29.9%).
- i. This compares poorly to the national average of 40.2%. Full-time massage workers on an adult wage earn around \$1,038 per week (lower than the average \$1,460). This is consistent with previous complementary sector wide surveys.<sup>iv</sup>

- 29.9% of massage therapists work full-time compared to the national average of 40.2%
- full-time massage workers on an adult wage earn around \$1,038 per week compared to the average of \$1,460.
- on average massage therapists are engaged in massage work for 18.6 hours per week, and myotherapy and musculoskeletal therapy is 21.3 hours per week.
- cannot work in government or state funded health services governed by Medicare Rules the without supervision of a registered health practitioner

6. Examples of undervaluation of professional qualified remedial massage therapists exists across government

- In 2021 [Federal Court of Australia](#), Justice Katzmann ruled that massage therapy fell under the Health Award. However, the undervaluation of professional qualified massage therapists exists across government, exacerbating gender inequality by inconsistent and contradictory government policies that perpetuate sexist culture, stereotyping, harassment, exclusion, and disadvantage for women in the sector.
- Australia's health policies and regulations are discriminatory because they do not mention, recognise or define the role of professional qualified massage therapist. Consequently, they are held in limbo occupying a vague conceptual space between sex work and healthcare, and between fraudulent health claims and legitimate healthcare services.
- Government funded massage can be provided by Allied Health practitioners as an adjunct modality, but massage is rarely documented in patient notes or any other data collection or public health record.
  - This perpetuates a lack of:
    - accurate data or evidence to support legislative reform or policy
    - appropriate scrutiny in terms of who, when and how massage is applied
    - documentation of results in helping improve or manage a patient's condition
    - accurate data pertaining to the practitioner, or the massage modality treatment used for a given condition
- Qualified professional massage therapists have a primary study focus on massage and undertake However, professional massage therapists undertake approximately 1000 hours of supervised training; whereas, allied health qualifications do not include training in massage therapy, and must be [undertaken as additional units of competency in massage](#), which are naturally limited in scope and practice. While there is a role and market demand for lower skilled spa-style relaxation massage services, the current skilled migration program will not ensure an increase of higher skilled massage therapists.
- [Australia's Skilled Migration Visa program](#) for massage therapists is one of the most significant issues affecting the productivity of the professional massage sector and positive wellbeing outcomes for patients. The skilled migration visa program concerning massage therapists has perpetuated an influx of low-skilled and poorly-trained migrant massage workers and contributes to issues plaguing the massage industry.<sup>v,vi</sup>
- Apart from the Australian Qualifications Framework, the various national skills taxonomies of the ABS, ANZSCO, CSOL and ANZSIC are largely irrelevant to the Australian professional massage sector and wider health sector. The descriptions are appropriate for entry level qualifications of Cert IV and below, and do not acknowledge the existence of the Remedial Massage Qualification or above, despite there being between 16000 and 19000 remedial massage therapists in Australia.

- g. ANZSCO currently describes the skills, competencies and tasks of massage therapists as a level 2 411612 occupation, and aggregates them all as 'massage therapists' – one uniform or homogenous occupation. However, while there are baseline skills and tasks, they are more appropriate as an entry level 3 occupation because it describes relaxation spa style massage associated with beauty and wellbeing services, services provided in shopping centres and shopping strips, and qualifications and training attained outside of Australia.
- h. ANZSIC only defines this service in the Classification of Other Allied Health Services (8539) and the services of Physiotherapists, Chiropractors and Osteopaths and along with complementary health services. Massage is also classified in the activities of brothels, under section (9534) 'Massage Parlours' a well-known term used to describe the services of sex workers. However, irrespective of whether sexual release can have a therapeutic effect, the specific services / techniques provided by sex workers have nothing to do with the healthcare related massage modalities of remedial massage therapy or myotherapy by any definition and are more appropriately described as erotic touch or sexual liaison services.
- i. The lack of reliability in migrant qualifications means that professional Associations and the Private Health Funds do not recognise undergraduate courses delivered substantially by distance, online or external modes, or gained outside Australia. Qualification/s gained completely through Recognition of Prior Learning (RPL) do not meet the educational criteria necessary to be recognised by certain Health Fund providers.
- j. While promoted as a Remedial Massage qualification, and being eligible for a Qualification Award Certificate, training provided by some local Registered Training Organisations (RTOs) that sponsor migrants also appear to be inadequate and does not prepare migrant students to work in professional Australian settings, or alongside Allied Health or Medical practitioners as part of an integrated service. Common barriers include:
- poor communication with the client due to language barriers leading to limited understanding of the client's health risks or needs, e.g. contraindications, cancer and pregnancy
  - an inability to keep accurate and meaningful client notes in English
  - poor understanding of human physiology
  - very limited understanding of the National Code of Conduct for Health Workers
  - poor understanding of voluntary certification or self-regulatory membership arrangements operated by various professional Associations
  - poor understanding of the Australian Private Health Insurance system
  - poor understanding of the Australia health system to identify how to best support patient needs and ensure positive outcomes.
- k. State level sex work decriminalisation conflates sex workers with legitimate massage therapists. Sex work decriminalisation enables the conflation of massage therapy with sex work and massage therapists with sex workers. The notion that massage therapy is a form of sex, and that sex work is like massage therapy, is deeply imbedded and has led to misrepresentation and harm, both to legitimate profession's skills and qualifications, and to the most vulnerable in our community. For example, the request to Fiona Patten MP to lead a review to make recommendations to the Minister for Consumer Affairs on decriminalising sex work in Victoria during 2019 did not include recommendations regarding managing or even acknowledging possible negative consequences on other sectors within the Victorian community. Even the terminology used 'massage parlour', conflating massage therapy with sex work without question, and thereby acknowledging that the term 'massage parlour' is a euphemism for brothel or place where sex work is provided.

- l. the Victorian reforming legislation, Stage 1, to decriminalise sex work equates sex work with massage by enabling sex workers to use terms associated with massage in advertisements 'if that is a relevant description of services provide'. This information is listed on the [Department of Consumer Affairs](#) (DoCA) website and illustrates a complete lack of understanding regarding the differences between legitimate massage therapy and sex work services and encourages fraudulent advertising.
- m. Responses from other jurisdictions suggest a misogynistic view of massage therapy. For example, this response from Shane Rattenbury MLA Attorney-General Minister for Consumer Affairs ACT, when these issues were raised exemplifies a flawed understanding of professional massage sector of health. 'I have sought advice from Access Canberra who has advised that the ACT Government does not propose to regulate sex work advertising at this time. Sex work businesses may operate lawfully in the ACT under the Sex Work Act 1992 (the Act). It would be inappropriate to prevent businesses offering sexual services from using the term 'massage' outright because it could form a legitimate part of a sexual service. Further, it is also possible that some sex workers are qualified massage therapists and massage may form part of the services they offer.
- n. This false advertising extends to promoting sexual services as therapeutic or remedial massage or myotherapy (recognised qualifications under the National Qualifications Framework) and includes terms describing treatment for a range of conditions and modalities within a particular area of qualification. This contravenes Section 29 of the Competition and Consumer Act 2010, which sets out that a person must not, in trade or commerce and in connection with the supply (or possible supply or promotion) of goods or services, make a false or misleading representation. However, this occurs as a sex industry wide issue in across Australia. The consequences for female massager therapists are significant because it creates a belief that all massage therapists are potential sex workers who can expect to be harassed as part of the job. Respondents to a 2022 Pulse Survey of Massage & Myotherapy Australia's 8,600 members indicated that some professional massage therapists experience sexual harassment from clients in their workplace daily
  - Over 54 per cent of respondents indicated that they were subject to sexual harassment in the form of requests for sexual services, either daily, weekly, monthly, or yearly.
  - 74 per cent indicated that they must regularly take steps to protect themselves and their staff.
  - Nearly 80 per cent indicated that they believe the services of professional massage therapists are devalued or undermined because of the confusion between professional and quasi-massage services.

## Proposals

1. These issues need to be acknowledge and discussed at a national level through the National Council of Ministers.
  - a. Funding and supporting a national Advanced Diploma of Myotherapy would help to achieve the best outcome and encourage formal integration that requires massage therapies to be delivered by professional massage therapists with recognised qualifications such as an Advanced Diploma or Degree. Currently, this number is around 20% of the professional qualified massage therapist workforce or between 4,000 and 5,000 therapists. Currently, the Advanced Diploma of Myotherapy is a Victorian-based qualification. It can be taught in other states but is not subject to funding. Hence only around 19 per cent of massage therapists hold

this higher-level qualification which equips them to undertake advanced modalities in physical and orthopaedic assessment, evidence-based assessment, treatment and rehabilitation of musculoskeletal pain and associated conditions. Budget provisions to fund and support the extension of the Victorian Advanced Diploma of Myotherapy to the nationally recognised Australian Qualifications Framework will ensure a skilled qualified massage workforce that can replace more costly allied health services.

- b. Where remedial massage therapy services provide relief of symptoms of pain and stress or clinical massage such as in post-surgery and aged care, higher qualifications are necessary to ensure a level of certainty about the professional conduct, skills and therapies offered by a therapist who could be funded under Medicare.
2. Incentives to undertake further training would help to separate promote the qualifications and skills of professional massage therapists
  - a. Significantly, a large proportion of massage therapists are prepared to undertake further studies, with approximately one quarter (24%) of respondents indicating they would undertake training in rehabilitation and injury management to qualify for third party insurance rebates; as well as undertaking training in advanced physiology and anatomy for specific chronic conditions to qualify for third party rebates.
  - b. Incentives for RTOs, universities and TAFE colleges to provide high level training in myotherapy, and incentives to lower VET, TAFE and University fees, or study grants and scholarships will incentivise more diploma qualified massage therapists to undertake further study. Providing such incentive will likely have a significant impact on upskilling the massage workforce. Augmenting the current educational environment by creating a nationally recognised advanced diploma will ensure a continuous and adequate supply of new, appropriately qualified and skilled therapists who can fill any growth in demand for professional health-related massage services.
3. Supporting data collection and research would help to evolve the understanding and value of massage therapists as legitimate healthcare providers, and create a greater level of confidence.
  - a. While the public health system appears to support the use of massage therapy, in practice, it is the opposite. The value of the massage modality treatments used in these settings is unclear and unacknowledged.
  - b. Funding and supporting opportunities for appropriate data collection that provides detailed metrics and breakdowns of massage services provided and outcomes of those services is central to delivering value-based care.
  - c. Improved monitoring and data collection of when and how massage therapies are used will lead to more informed policy, funding and care decisions and a better understanding of the efficacy of massage in relation to patient outcomes.
3. Supporting the National Best Practice Quality Assurance Standards (QA) lends opportunity to build the professionalism and standing of massage therapists through higher-level best practice standards.
  - a. During 2016, the Association introduced a National Certification Scheme which is available to members and non-member therapists to become a Certified Specialist®. Certification demonstrates that they are a practitioner and a massage service that meets independently certified best practice quality assurance standards.
  - b. The Certification Scheme provides a level of certainty that the quality of remedial massage and myotherapy services offered in Australia meet a national best practice standard. Consequently, for the first-time, the community and the wider health sector was able to find more easily, legitimate professional massage or myotherapy services.
  - c. Incorporating incentives to undertake Quality Assurance Standard units in the Advanced Diploma will help to achieve a large national workforce of myotherapy graduates who are

- trained in QA and who have an appreciation of the need for independently verified QA Standards. This will provide reassurances that myotherapy graduates have the appropriate advanced skills and standards of practice to work in clinical settings and complex conditions.
4. Provide funding support and policy for a self-help and community education program to improve safety at work, community choice and access to professional qualified remedial massage therapists and myotherapists.
    - a. To protect and educate massage therapists and the community we propose a self-help program and Queensland community education campaign that is designed to address misunderstandings and false perceptions, and uniquely distinguish the health services of professional qualified remedial massage therapists and myotherapists. This would be in the form of a three-year program involving: qualified massage therapist training and marketing support; an information and awareness program for registered health practitioner; a community self-help and education campaign.
    - b. The objectives would be to: 1. Redress the conflation of professional qualified massage therapists and sex workers; improve the safety of qualified massage therapists; reduce client-initiated workplace sexual harassment; and 2. Improve public safety and choice - a more informed community in terms of general knowledge and access to information, enhance the knowledge and understanding of registered health practitioners in regard to the efficacy and services of remedial massage therapists and myotherapists.

Signature: 

Name: Ann Davey

Date: 26 September 2024

<sup>i</sup> The Massage & Myotherapy Australia 2023 Practitioners Survey

<sup>ii</sup> *AAMT Practitioners Survey 2012 – Massage & Myotherapy Australia*

<sup>iii</sup> <https://www.aihw.gov.au/reports-statistics/health-conditions-disability-deaths/burden-of-disease/overview>

<sup>iv</sup> Steel, A., Leach, M.W.J., Britt, S.D., Schloss, J., Diezel, H. and Adams, J., 2018. 'The Australian Complementary Medicine Workforce: A Profile of 1,306 Practitioners from the PRACI Study', The Journal of Alternative and Complementary Medicine, VL 24, DO 10.1089/acm.2017.0206.

<sup>v</sup> Selvey, L.A.A., Lobo, R.C.A., McCausland, K.L.A., Donovan, B.A., Bates, J.A. and Hallett, J., 2018. 'Frontiers in Public Health' R 10.3389/fpubh.2018.00171, 2018-June-13 [Challenges facing Asian Sex Workers in Western Australia: Implications for Health Promotion and Support Services](https://www.frontiersin.org/article/10.3389/fpubh.2018.00171), <https://www.frontiersin.org/article/10.3389/fpubh.2018.00171>

<sup>vi</sup> Parisuth, S., 2019. [Victoria Police reveal that massage shops illegally offering sexually services are prevalent throughout Melbourne and Victoria](#), 3 October.