



Medical Technicians under the HPSS Award

Gender undervaluation – priority awards review
AM2024/20 – *Health Professionals and Support Services Award 2020*

Pay Equity and Awards Team



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Medical Technicians under the HPSS

This document has been produced to clarify the scope of the gender undervaluation – priority awards review relating to ‘medical technician’ under the Health Professionals and Support Services Award 2020, which was identified as a priority occupation for review.

Purpose

This paper has been published to respond to questions that have been raised during the [Gender undervaluation – priority awards review](#) proceedings which classifications in the *Health Professionals and Support Services Award 2020* (HPSS Award) map to the occupation of ‘Medical Technician’ considered in the Stage 1 pay equity research project report (Stage 1 report).

Background

1. The Expert Panel in the *Annual Wage Review Decision 2023–24 (AWR 2024 Decision)*¹ determined that proceedings would be commenced to examine and address gender undervaluation in modern awards and classifications identified as priority areas for attention based on the findings of the gender equity research project.
2. Paragraphs [10] and [120] of the *AWR 2024 Decision*² determined that Medical Technicians covered by the HPSS Award were one of the priority occupations to be examined in the gender undervaluation review.
3. The inclusion of Medical Technicians covered by the HPSS Award was confirmed in paragraph [1] of a Statement³ issued by the Expert Panel on 7 June 2024 following the

¹ [Annual wage review 2023–24 \[2024\] FWCFB 3500 | Fair Work Commission](#)

² [Annual wage review 2023–24 \[2024\] FWCFB 3500 | Fair Work Commission](#)

³ [Statement \[2024\] FWCFB 280](#)

commencement of proceedings to consider variations to certain classifications and minimum wage rates on work value grounds to remedy potential gender undervaluation.

4. During proceedings, parties have expressed some uncertainty regarding which of the occupations listed in the indicative job roles within the classification structure in the HPSS Award relate to Medical Technicians. The Commission has also received correspondence⁴ requesting clarity regarding this and the intended scope of the review of Medical Technicians covered by the HPSS Award.

The Decision

5. The *AWR 2024 Decision* set out how the Stage 1 and Stage 2 research reports identified medical technicians as one of the priority occupations for review. In the Stage 1 report, the occupation was identified because it met the three criteria of being large, very highly feminised and located within feminised industry classes⁵.
6. Paragraph [93] of the *AWR 2024 Decision* provides a table (Table 17), derived from Table 5.2 of the Stage 1 report setting out the 29 occupations identified as relevant to gender-based occupational segregation. Medical Technicians in the Pathology and Diagnostic Imaging Services Industry class were included in this table.
7. Table 18, included at paragraph [96] of the *AWR 2024 Decision* and derived from Tables 7.2, 8.2, 9.2, 10.2, 12.2 and 13.2 of the Stage 1 report, demonstrates that Medical Technicians in the Medical and Other Health Care Services Industry Subdivision (ANZSIC 85) are very highly feminised occupations that are significantly award-reliant.⁶
8. Table 19, at paragraph [99] of the *AWR 2024 Decision*, includes Medical Technicians covered by the HPSS Award as one of the occupations that is subject to most or all of the indicia of gender undervaluation and identified that the occupation has not been subject to a work value assessment free of gender assumptions.

⁴ [Correspondence \(fwc.gov.au\)](https://www.fwc.gov.au)

⁵ [Annual wage review 2023–24 \[2024\] FWCFB 3500 | Fair Work Commission](#), Para 92

⁶ [Annual wage review 2023–24 \[2024\] FWCFB 3500 | Fair Work Commission](#), Para 96



The Research

Stage 1 report: Gender-based Occupational Segregation: A National Data Profile

9. The Stage 1 report: Gender-based Occupational Segregation: A National Data Profile examines current patterns of segregation in Australia using a data-driven approach, analysing data from the Australian Bureau of Statistics 2021 Census and the 2021 Survey of Employee Earnings and Hours (EEH).
10. The Stage 1 report made several references to the data drawn for Medical Technicians using ANZSIC and ANZSCO codes, and this data was the basis for identifying this as a priority occupation for the gender undervaluation review.
11. The data referenced in Table 5.1, Table 5.2, Table 7.1 and Table A.2 of the Stage 1 report are all based on data drawn for Medical Technicians in Pathology and Diagnostic Imaging Services under the following Australian and New Zealand Standard Industrial Classification (ANZSIC) codes and Australian and New Zealand Standard Classification of Occupations (ANZSCO) codes:
 - ANZSIC Industry Subdivision: 85 Medical and Other Health Care Services⁷
 - ANZSIC Industry Subcategory: 8520 Pathology and Diagnostic Imaging Services⁸
 - ANZSCO: 3112 Medical Technicians⁹
12. ANZSIC Industry Subcategory 8520 Pathology and Diagnostic Services is defined as:

This class consists of units mainly engaged in the provision of pathology laboratory or diagnostic imaging services such as analytical services including body fluid analysis, ultrasound or X-ray services.

Primary activities

Diagnostic imaging service

Medical laboratory service

Pathology laboratory service

⁷ [Subdivision 85 Medical and Other Health Care Services | Australian Bureau of Statistics \(abs.gov.au\)](https://abs.gov.au/subdivisions/85)

⁸ [Class 8520 Pathology and Diagnostic Imaging Services | Australian Bureau of Statistics \(abs.gov.au\)](https://abs.gov.au/classifications/8520)

⁹ [Unit Group 3112 Medical Technicians | Australian Bureau of Statistics \(abs.gov.au\)](https://abs.gov.au/unit-groups/3112)

X-ray clinic service

Exclusions/References

Units mainly engaged in providing chemical testing and analysis services (other than pathology services) are included in Class 6925 Scientific Testing and Analysis Services.

13. The Stage 1 report provides the following definition of Medical Technicians in Pathology and Diagnostic Imaging Services:

- *Medical Technicians in Pathology and Diagnostic Imaging Services (85.3% female, 13,738 people)*

*Medical Technicians set up, maintain and operate equipment; and perform or assist with diagnostic tests, **including** as Medical Laboratory Technicians and Pathology Collectors / Phlebotomists.¹⁰*

14. It should be noted that the definition **includes** Medical Laboratory Technicians and Pathology Collectors/Phlebotomists, but these occupations are listed as examples only and are not an exhaustive list of the occupations listed under ANZSCO 3112.

15. The research examined data based on 4-digit ANZSCO codes,¹¹ which in the case of Medical Technicians is 3112. The definition for the 4-digit ANZSCO code 3112 Medical Technicians is:

‘Medical Technicians operate anaesthetic, cardiac, operating theatre and medical testing equipment, perform and assist with laboratory tests, and fill prescriptions in support of Health Professionals.’

16. Data relied upon for the Stage 1 report included all occupations listed within ANZSCO code 3112. The indicative skill level for most occupations within ANZSCO code 3112 is commensurate with an Australian Qualifications Framework (AQF) Associate Degree, Advanced Diploma or Diploma, or at least three years of experience (ANZSCO Skill Level 2). For pathology collectors / phlebotomists and operating theatre technicians the level of skill is commensurate with AQF Certificate III, including at least two years of on-the-job

¹⁰ Cortis, N., Naidoo, Y., Wong, M. and Bradbury, B. (2023). [Gender-based Occupational Segregation: A National Data Profile](#). Sydney: UNSW Social Policy Research Centre, page 33

¹¹ Ibid, page 25

training, or AQF Certificate IV or at least three years of relevant experience (ANZSCO Skill Level 3).¹²

17. There are 15 occupations listed within the 4-digit ANZSCO code 3112:

- 311211 Anaesthetic Technician
- 311212 Cardiac Technician
- 311213 Medical Laboratory Technician
- 311214 Operating Theatre Technician
- 311215 Pharmacy Technician
- 311216 Pathology Collector / Phlebotomist
- 311217 Respiratory Technician
- 311299 Medical Technicians not elsewhere classified, which includes:
 - Audiometrist
 - Dialysis Technician
 - Electroencephalographic Technician
 - Mortuary Technician
 - Ophthalmic Technician
 - Orthotic and Prosthetic Technician
 - Perfusionist
 - Renal Technician

18. When mapping the subset of occupations under ANZSCO code 3112 Medical Technicians with Schedule A – Classification definitions in the HPSS Award, most indicative roles under the Technical and clinical column can be matched to the ANZSCO 3112 occupations, except for Personal care workers, Instrument Technicians and employees in Levels 1 and 2 of the HPSS Award. Medical technicians under ANZSCO code 3112, can also be matched to Level 1, Pay point 1 of Schedule A.2, where an employee has a diploma qualification, and some occupations listed as common Health Professionals in Schedule B of the HPSS

¹² [Unit Group 3112 Medical Technicians | Australian Bureau of Statistics \(abs.gov.au\)](https://abs.gov.au)

Award, including Medical Laboratory Technicians, Medical Technician/renal dialysis Technician, Cardiac Technologist, and Clinical Perfusionist.

19. For clarity, the indicative Technical and clinical roles in Schedule A and Schedule B of the HPSS Award that match with the occupations defined by ANZSCO 3112 Medical Technicians are:

A.1.3 Support Services employee—level 3

- Laboratory Assistant (ANZSCO 311213)
- Theatre technician (ANZSCO 311214)

A.1.4 Support Services employee—level 4

- Orthotic technician (ANZSCO 311299)
- Pathology collector (ANZSCO 311216)
- Pathology technician (ANZSCO 311216)
- Theatre technician (qualified) (ANZSCO 311214)

A.1.5 Support Services employee—level 5

- Orthotic technician (ANZSCO 311299)
- Pathology collector (ANZSCO 311216)
- Pharmacy technician (ANZSCO 311215)
- Theatre technician (ANZSCO 311214)

A.1.6 Support Services employee—level 6

- Anaesthetic technician (ANZSCO 311211)
- Pathology collector (ANZSCO 311216)
- Pathology technician (ANZSCO 311216)
- Pharmacy technician (ANZSCO 311215)

A.2/Schedule B

- Medical Laboratory Technicians;
- Medical Technician/renal dialysis Technician;
- Cardiac Technologist; and
- Clinical Perfusionist.

20. Employees employed above Level 6 of Schedule A of the HPSS Award may be medical technicians who hold relevant AQF qualifications but perform additional duties applicable to the higher classification.
21. While the term Laboratory Assistant does not replicate the exact wording used for the title of a Medical Laboratory Technician, the ANZSCO definition of a Medical Laboratory Technician (311213) is consistent with the role of a Laboratory Assistant and under the Level A1.3 of the HPSS Award requires specific on-the-job training and/or relevant skills training or experience. This is why Laboratory Assistants have been included in the list of mapped occupations above:
- Performs routine medical laboratory tests and operates diagnostic laboratory equipment under the supervision of Medical Laboratory Scientists and Pathologists.*
22. The terms Pathology collector and Phlebotomist are grouped together under ANZSCO 311216 and defined as someone who ‘Extracts, collects, labels and preserves blood and other specimens from patients for laboratory analysis’¹³.
23. Pathology collectors/phlebotomists (ANZSCO 311216) and medical laboratory technicians (ANZSCO 311213) make up the vast majority (13,510) of those employed in the Medical Technician ANZSCO occupation code 3112 (13,739).
24. It should be noted that while Dental Assistants are included in the Technical and clinical indicative roles in Schedule A of the HPSS Award this occupation is being considered by the Expert Panel as an identified priority occupation and will be considered as part of this review. They are not included in the list above because they are not an occupation under ANZSCO 3112 Medical Technician, but rather an occupation under ANZSCO 4232.
25. Dental Technicians are also listed in the indicative roles at Level 4 of Schedule A but they are not included in ANZSCO 3112, so are not included in the mapped list above. Dental Technicians come under ANZSCO 4112 Dental Hygienists, Technicians and Therapists.
26. It should be noted that the indicative roles for Medical Technician relate to those listed under the ‘Technical and clinical’ column and to Medical Technicians under Schedule A.2 and listed in Schedule B who are diploma qualified, not to indicative roles listed under ‘General and administrative services’ or ‘Food services’ columns.

¹³ [Unit Group 3112 Medical Technicians | Australian Bureau of Statistics \(abs.gov.au\)](https://abs.gov.au)

27. As per paragraph [1](3) of the Statement of the Full Bench, the Review of the HPSS Award includes a review of classifications applying to health professionals generally.¹⁴

Stage 2 Report: Gender pay equity research, AWR 2023–24

28. The *Stage 2 report: Gender pay equity research, Annual Wage Review 2023–24*¹⁵ (Stage 2 report) examined 12 of the 13 modern awards identified in the Stage 1 report, to identify the history of wage fixing and work value assessments to aid the identification of any indicia of gender undervaluation.

29. A history of the HPSS Award is provided in paragraphs [294] to [319] of the Stage 2 report. The report found that ‘prior to the 2008–09 award modernisation process employees falling within coverage of the Health Professionals Award were covered by a wide range of State and federal pre-reform instruments. There is very little information available on the public record to indicate how the classifications and wage rates were set in the pre-reform instruments’¹⁶.

30. During the award modernisation process an indicative list of awards were published which covered the whole health sector including those instruments relevant to the HPSS Award.

31. In examination of the pre-reform instruments and the award modernisation process, the report found that ‘The support service employee classifications in the Health Professionals modern award appear to be based on the HAS Victorian Award,’¹⁷ and ‘Given that the HAS Victoria Award 1998 was made by consent, there was no consideration given the wages that were set and the classification structure of the award.’¹⁸

32. The report also found that ‘The exposure draft set out general definitions in respect of each health professional levels in Schedule A and included a list of common health professionals in Schedule B. Following consultation with the parties, several professions

¹⁴ [Statement \[2024\] FWCFB 280](#)

¹⁵ Fair Work Commission, [Stage 2 Report: Gender pay equity research, Annual Wage Review 2023–24](#), 4 April 2024

¹⁶ *Ibid*, para [299]

¹⁷ *Ibid*, para [307]

¹⁸ *Ibid*, para [308]

were added or removed from Schedule B, however classification definitions remained largely unchanged.’¹⁹

33. The examination of the HPSS Award following the award modernisation process found that ‘Since the award was made in August 2009, aside from the annual wage review adjustments, there has been no further consideration of wages and the classification structure.’²⁰

Award Mapping: Annual Wage Review 2012–13

34. In August 2012, the Fair Work Commission prepared and published award mapping documents for the *Annual Wage Review 2012–13* which compared the coverage of a modern award with the industry description in an ANZSIC class/4 digit code.

35. A guide²¹ and explanatory report²² were prepared to assist in reading and understanding the mapping documents. Two spreadsheets were published regarding the HPSS Award: one under the Modern Awards list,²³ and one under the ANZSIC list.²⁴

36. The HPSS Award spreadsheet listed several ANZSIC codes that clearly fit into the classification structure in the HPSS Award and one of those was class 8520 Pathology and Diagnostic Imaging Services.

37. As it was only a comparison of the Award and the ANZSIC codes it did not provide the level of detail in relation to occupations that a comparison to the relevant ANZSCO codes provide, however, it confirms that the correct ANZSIC class was applied to the research for the Stage 1 Report, relating to the HPSS Award.

¹⁹ Ibid, para [317]

²⁰ Ibid, para [319]

²¹ RSRT & Minimum Wages Research team, Tribunal Services branch, Fair Work Australia, [Guide to mapping documents prepared in accordance with ‘Fair Work Australia Research Report 2/2012 - Analysing modern award coverage using the Australian and New Zealand Standard Industrial Classification 2006: Phase 1 report’](#), 15 October 2012.

²² Minimum Wages Research Branch, Fair Work Australia, [‘Fair Work Australia Research Report 2/2012 - Analysing modern award coverage using the Australian and New Zealand Standard Industrial Classification 2006: Phase 1 report’](#), February 2012

²³ [Mapping documents listed by modern award | Fair Work Commission \(fwc.gov.au\)](#)

²⁴ [Mapping documents listed by ANZSIC division | Fair Work Commission \(fwc.gov.au\)](#)



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Conclusion

38. The Stage 1 Report identified that Medical Technicians as defined under ANZSCO 3112 meet the gender undervaluation indicia and are a priority occupation²⁵. They map with the Support Services classifications in the HPSS Award with an ANZSCO skill level 2 or 3, and are set out in paragraph 19 above.

²⁵ [Unit Group 3112 Medical Technicians | Australian Bureau of Statistics \(abs.gov.au\)](https://abs.gov.au)