



Public Service Association of SA

GPO Box 2170, Adelaide, SA 5001

122 Pirie Street, Adelaide, SA 5000

Phone: (08) 8205 3200

enquiries@psaofsa.asn.au

www.psaofsa.asn.au

29 April 2025

Tom Kidman
Director, Industrial Relations
Industrial Relations and Policy Branch
Attorney-General's Department

By email: Tom.Kidman@sa.gov.au

Dear Mr Kidman

Re: Salaried Enterprise Agreement Negotiations - Response to AHP-AHA Offer

This letter is the PSA's formal response to the government's *"Revised Terms of Offer – Enterprise Agreement to apply to public sector Allied Health Professionals and Allied Health Assistants"*.

This response also confirms the PSA's initial response we provided orally to you on Tuesday 15 April 2025.

The PSA rejects the terms of the government's revised offer in their entirety.

The government offer was made *"...as a total package in full and final settlement of all claims made in enterprise bargaining negotiations."*

Your offer excludes almost all the conditions contained in the current salaried enterprise agreement, which covers Allied Health Professionals and Allied Health Assistants.

A specific object of the current salaried agreement, negotiated by the PSA, requires *"Existing conditions of employment applying to a party not being reduced....."* (Clause 2.2.6).

The government's offer is a clear statement of retreat from that commitment.

A fundamental requirement of the PSA is that any successor agreement to the current salaried enterprise agreement must not remove or reduce any existing conditions.

The PSA confirms our position in the strongest terms that any successor agreement to the salaried enterprise agreement must cover all those employees covered by current salaried enterprise agreement.

To be clear, that means the PSA does not support the concept or the proposal for a separate Allied Health Professional-Allied Health Assistant enterprise agreement.

The PSA is engaging in negotiations with the government consistent with the terms of the *Notice of Intention To Negotiate An Enterprise Agreement Under the Fair Work Act 1994 (SA)* issued by the government on 5 August 2024.

The terms of that Notice were that *“It is proposed that the enterprise agreement will bind all employees covered by the **South Australian Public Sector Enterprise Agreement: Salaried 2021** (original emphasis).”*

The PSA has received no advice that the Notice of 5 August 2024 has been rescinded, withdrawn or modified since it was issued. The Notice issued on 5 August 2024 remains the basis on which negotiations must be conducted for a successor salaried enterprise agreement.

The PSA rejects the government’s offer of a separate AHP-AHA enterprise agreement *“as a total package in full and final settlement of all claims made in enterprise bargaining negotiations”*.

To the extent that the government’s offer deals with claims made by the PSA we provide the following response.

Term of agreement

Members will consider any proposed length of a successor agreement in the context of the complete package of wages and conditions being proposed. A four year term is unacceptable given the government’s present proposals.

Wages

The proposed wage increases are completely insufficient for any public sector worker to cover the rises in the cost of living they have endured in recent years, nor deal with the attraction and retention crisis. The wages offer would not bring South Australia’s public sector wages back into balance with other states and other sectors of the workforce, nor redress successive governments’ policies of public sector wage suppression.

A significant wage increase is a key priority for PSA members. Any wage outcome needs to make up for the fact that our members have seen an 8-10% decrease in the real value of their wages.

Making up this difference must be the starting point **before** additional wage increases are applied in future years. Attraction and retention remain significant areas to address and just wages play a key part in this.

Job Security

The removal of Appendix 1 is a hostile and serious attack on members’ job security, as well as their rights to be treated with respect and dignity. Retaining the active case management and accountability requirements of Appendix 1 are threshold issues for any successor enterprise agreement.

Consultation

The PSA strongly opposes this proposed significant reduction in conditions. The right of public sector workers to have a genuine opportunity to influence decisions affecting them at work is fundamental to the respect and dignity with which they are to be treated, and for the provision of the public services our community requires.

Dispute Resolution

The PSA strongly opposes this proposed significant reduction in conditions. The PSA seeks to retain and improve existing conditions, not reduce them.

Additional qualifications

The PSA has been advocating for all employees covered by the salaried agreement to receive an allowance for additional qualifications. However, the amounts the government has proposed are insufficient, and, for example, are approximately only 20% of the rates currently paid to public sector nurses.

Professional development allowance (AHPs only)

The PSA has been advocating for this concept for all employees covered by the salaried agreement who need to maintain professional qualifications. The PSA notes the additional amount included in the revised offer. However, the amount the government has proposed is insufficient, and is still less than the rate currently paid to public sector nurses, and to a number of AHPs under current local arrangements.

The PSA is also concerned that the revised proposal to limit the additional allowance to only those with a greater FTE fraction than 0.6 will serve to exacerbate the gender pay gap.

Multiclassified roles

The PSA has been advocating for all employees covered by the salaried agreement to receive a similar allowance, as well as associated best conditions, where a role is multiclassified.

Work Arrangements – seven day rostering

The PSA has been advocating for a comprehensive shift work clause for the last two rounds of salaried enterprise agreement negotiations and continues to do so in this round.

No shift work conditions are included in the government's offer nor have any been provided in draft to the PSA. There are no protections for those rostered over seven days. Additionally, the proposal for an undefined rostering period is extremely problematic for averaging hours.

Employees required to work across seven days are already entitled to five weeks annual leave, based on working a certain number of Sundays and Public Holidays in a year (SAPSEAS Clause 28).

The issue of being 'available to work over seven days' is lacking in detail and is problematic.

The PSA has been strongly advocating for six weeks leave to be provided on a monthly accrual basis for any employee working non-standard Monday to Friday hours and will continue to do so.

On-Call

This is a condition currently available under the salaried agreement (SAPSEAS clause 17.4.2).

Classification

Experience, especially recent experience, has demonstrated that when the government proposes reviews in an enterprise agreement negotiation context they have no commitment to conducting those reviews, and are not genuine in the reviews being a vehicle for resolving issues, especially in a timely manner.

The terms of a proposed review of classification structures are very broad. The proposal is to 'aim to complete the review in two years'. Given past experience with the government conducting reviews, it is very unlikely for this to be achieved in that time frame, if at all.

The proposed review appears to only be able to offer recommendations, at which point those recommendations would be subject to further approval based on funding, or a lack thereof.

The AHP1 – AHP2 progression changes represent a small change from the current peer assessment model. However, the government's proposal opens up clear opportunities for agencies to interfere in, and obstruct, justified progression.

We acknowledge the government's proposed change for psychologists' progression to AHP3 in relation to the requirement to provide supervision.

Regional incentives

While important for attraction to vacancies in the regions, this proposal does nothing to support members already living and working in the regions. The PSA is advocating for benefits for members who live in the regions to ease the burden of additional travel and costs incurred in living away from the metropolitan area, and for retention.

The amounts listed in the revised offer are significantly less than the amounts currently being paid to some AHPs working in regions. They are therefore less than the government has already acknowledged are required to have an impact on the issue of attracting AHPs to work in regions.

Permanency

This proposal in relation to the Public Sector Act only affects AHP and AHA members in Health. AHPs and AHAs outside of Health can already be employed under the section to which the proposal refers.

The reality is that Health could administratively decide to employ AHPs and AHAs on an ongoing basis at any time without the need for a change to the regulations to require them to limit term contracts. Health is choosing to provide insecure employment.

This proposal is acknowledgement that the government is in breach of the existing commitment in the current salaried enterprise agreement that ongoing employment is the primary form of public sector employment (clause 2.2.1).

Workloads

The PSA notes the revised offer includes a reference to a *“workload management provision modelled on the terms contained in clauses 15.1 to 15.4 of the Current Salaried Agreement (sic)”*.

The PSA is not distracted or impressed by your slippery wording about terms being *“modelled on”* existing provisions. Your *“modelled on”* can only mean a reduction in conditions.

Our position is that there should be no reductions to any protections or provisions contained in the current salaried agreement — especially those proposed and pursued by the PSA as this clause was — and that AHPs and AHAs should remain covered by a successor salaried agreement which contains the full protections contained in this current clause.

Car parking

The PSA notes the inclusion in the revised offer a proposal to an entitlement to subsidised car parking and free public transport. The PSA reiterates our proposal that this entitlement should include the Adelaide Dental Hospital.

The government's condition-stripping proposals for a separate AHP-AHA agreement are reminiscent of the disgraceful *Work Choices* era. This government should be ashamed of treating its workforce with such disrespect and adopting such a hostile approach to its workforce.

The PSA's requirements for a successor agreement to the salaried agreement are based upon treating public sector employees with respect and dignity, and treating the public sector as a treasured and valued community asset.

The PSA has provided the government many times with our requirements and objectives for a single successor agreement to the current salaried enterprise agreement.

We stand ready to engage in constructive negotiations that improve existing conditions; that meet PSA members' requirements; and that represent the measure of respect and dignity which the state's public sector workers so richly deserve.

In the meantime, we confirm our rejection of the government's revised offer for a separate Allied Health Professional and Allied Health Assistant enterprise agreement.

The government must focus its attention on negotiating a successor agreement to the current salaried agreement instead of focussing on stripping conditions away from certain groups of workers and creating division and disharmony in the public sector workforce.

The contact person in relation to these enterprise agreement negotiations is PSA Manager, Policy and Strategy, Austin White.

Yours sincerely

A handwritten signature in black ink, appearing to read 'NBrown', with a long horizontal flourish extending to the right.

Natasha Brown
General Secretary