

Naturopaths for Registration

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The Secretary
Senate Community Affairs Committee
PO Box 6100
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Submission into the Inquiry into the National Registration and Accreditation Scheme for Doctors and Other Health Workers

Naturopaths for Registration is a rapidly growing collective of around 200 mostly university qualified Naturopaths and Western Herbalists. Originating from a network of practitioners that met as a professional peer group, the primary focus and intention of the collective over the past three years has become a drive for national registration of Naturopaths and Western Herbalists.

Naturopaths for Registration is a single issue, political lobby group, independent of any political party, professional association or training provider.

Naturopaths for Registration supports the establishment of a National Registration and Accreditation Scheme for Health Professionals and urges government to as soon as practicable include the registration and accreditation of Naturopaths and Western Herbalists under the scheme.

Naturopaths and Western Herbalists conduct around 8.7 million consultations per year¹ and are the largest complementary therapy workforce² in Australia. Unqualified or improper practice of naturopathy and herbal medicines poses risk to the general public's health and safety but can be ameliorated through appropriate regulatory frameworks.

The Latrobe University (*Lin et al*)³ report in 2005, after extensive investigation into the most appropriate regulation for Naturopathy and Western Herbal Medicine, recommended Statutory Registration for Naturopaths and Western Herbalists.

a) Impact of the Scheme on State and Territory Health Services

- o Safer health professional practice, underpinned by uniform, high, educational standards across the States and Territories
- o Decreased administrative burden and increased efficacy with a streamlined, uniform registration process for the professions
- o Greater health professional mobility across jurisdictions

References

1. Xue C, Zhang A, Lin V, Da Costa C, Story D. Complementary and Alternative Medicine Use in Australia: A National Population-Based Survey. *Journal of Alternative and Complementary Medicine* 2007; 13: 643-650.
2. Australian Bureau of Statistics. Australian Social Trends: Complementary Therapies. Canberra: Australian Bureau of Statistics, 2008.
3. Lin V, Bensoussan A, Myers S, McCabe P, Cohen M, Hill S, Howse G. The Practice and Regulatory Requirements of Naturopathy and Western Herbal Medicine. Melbourne: Department of Human Services, 2005.
4. Wardle J. Regulation of Complementary Medicines A brief report on the regulation and potential role of complementary medicines in Australia. Brisbane. Naturopathy Foundation, 2008.
5. National Drugs and Poisons Schedule Committee, The Standard for the Uniform Scheduling of Drugs and Poisons. Canberra, 2008
6. Chinese Medicine Registration Board. Chinese Medicine Registration Board. 2000.

- b) A national scheme will ensure greater public safety and patient care with
- accreditation ensuring uniform standards of education and training across jurisdictions for Naturopaths and Western Herbalists
 - a clear, consistent complaints mechanism for the public
 - increased public knowledge and accessibility to information regarding health care professionals by way of a public register
- c) The Scheme will ensure minimum standards of training and qualifications for health professionals

Currently there is no barrier to practice, legal or otherwise, to stop untrained, poorly trained, unethical or criminal persons from setting up and providing naturopathic and herbal medicine services. This includes other health practitioners who have limited or no training in naturopathic and herbal medicines. There is no uniform minimum education standard for entry to practice.

The identification of well qualified and poorly qualified practitioners is difficult both for the public and for referring health practitioners. Not only does this place the public at risk but a highly trained workforce has been left on the fringes of healthcare provision and placed on the same level as those with little or no training at all ⁴.

Registered health practitioners (Doctors, Dentists, Pharmacists and Veterinarians) without any training in herbal medicines can prescribe scheduled herbal medicines while highly qualified practitioners of herbal medicine cannot ⁵.

- d) The scheme will provide a uniform, consistent complaints mechanism for the public and a transparent disciplinary process for health professionals.

Currently the public can lodge a complaint regarding a Naturopath or Western Herbalist, with an association, with the Health Care Complaints Commission or with Fair Trading but these channels vary in quality and ease of access ⁶, and creates confusion for the consumer.

Existing complaints processes in relation to false, misleading or deceptive advertising, including claims to cure cancer and other terminal illnesses, can be lengthy and provide little if any ongoing protection for consumers ³.

Current complaints handling by professional associations is potentially flawed due to a lack of public transparency, limited avenues of appeal, a lack of power to prevent a practitioner from joining another professional body, and association members and office bearers whom may lack experience in matters of fairness and natural justice ⁶. There is also a potential conflict of interest in that professional associations exist to support the interests of their membership.

Naturopaths for Registration have strenuously supported the inclusion of Naturopaths and Western Herbalists in the National Registration and Accreditation Scheme in a submission to the AHMAC Committee. It is attached to this submission.