

# Response ID ANON-G8U4-E635-B

Submitted to National Health Literacy Strategy Framework Consultation  
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## Introduction

1 What is your name?

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2 What is your email address?

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3 Are you responding on behalf of an organisation, or as a consumer/individual?

Organisation or Individual:

On behalf of an organisation

4 What is your organisation and/or field of expertise?

Organisation or Field of expertise:

Australian Naturopathic Council <https://www.naturopathiccouncil.org.au/>

5 If representing an organisation, which sector does your organisation belong to?

Professional body/Peak organisation

Please specify which organisation :

## Consultation Questions

6 Does the Framework capture the important components? If not, please describe what else is needed. (See diagram page 6)

Yes

Important Components text box:

The framework captures most of the important components and is supported by the Australian Naturopathic Council (ANC), however as the NPHS draft vision mentions: "Leadership and action by many organisations and individuals will be required to improve health literacy"

The ANC calls on the Australian government to harness the the wealth of knowledge and expertise of the naturopathic profession, and in addition, incorporate their patient's needs into this framework.

The preventative orientation of naturopaths contributes to alleviating the burden on public healthcare systems by promoting the health of consumers and preventing further movement into the healthcare system. The core philosophy of naturopathy incorporates the practice of preventive medicine and identification of the cause of illness in an individual, using nutritional and lifestyle measures by encouraging healthy behaviours, health literacy and self-responsibility (Foley et al., 2020; Steel, Tiveron, et al., 2020).

Approximately 6.2% of Australians have consulted with a naturopath in the previous 12 months and 59.6% use their naturopath as their primary health care provider; with 22.2% as their sole primary care provider and 37.1% as the primary provider in conjunction with other health providers (e.g. GPs) used in a secondary capacity (Wardle et al., 2019).

As a longstanding, significant component of the health care landscape – naturopaths have been unnoticed by the preventive health field to date. Many naturopathic patients are dissatisfied with available health services, and distrust government-provided messages. This has driven many to seek help for their unmet health needs from alternative sources which may promote public health ideas not aligned with government messaging (Howard et al., 2013; Rozbroj et al., 2019). Identifying and understanding the (non)alignment of their health promotion activities with government public health messaging is crucial to the NHLS fulfilling on its promise to the Australian community. (Steel, 2022)

References:

Foley, H., Steel, A., & Adams, J. (2020). Consultation with complementary medicine practitioners by individuals with chronic conditions: Characteristics and reasons for consultation in Australian clinical settings. *Health & Social Care in the Community*, hsc.13072. <https://doi.org/10.1111/hsc.13072>

Howard, M., Fleming, ML, Parker, E. (2013) Patients Do Not Always Complain When They Are Dissatisfied: Implications for Service Quality and Patient Safety. *Journal of Patient Safety* 9(4):224-231

Rozbroj, T., Lyons, A, Lucke, J. (2019) Psychosocial and demographic characteristics relating to vaccine attitudes in Australia. *Patient Educ Couns* 102(1),172-9

Steel, A (2022) Engaging the 'forgotten' public health workforce: ensuring the impact of the national preventive health strategy. Funded NHMRC grant: project description (not for public dissemination)

Steel, A., Tiveron, S., Reid, R., Wardle, J., Cramer, H., Adams, J., Sibbritt, D., & Lauche, R. (2020). Do women who consult with naturopaths or herbalists have a healthy lifestyle?: A secondary analysis of the Australian longitudinal study on women's health. *BMC Complementary Medicine and Therapies*, 20(1), 349. <https://doi.org/10.1186/s12906-020-03153-6>

Wardle, J., Steel, A., & Casteleijn, D. (2019). An evidence based overview of naturopathic practice in Australia. *Australian Journal of Herbal and Naturopathic Medicine*, 31(1), 9–13. <https://doi.org/10.33235/ajhnm.31.1.9-13>

7 Is the proposed vision appropriate for the National Health Literacy Strategy (see page 7)

Yes

Vision: All Australians are enabled to make informed decisions about their health.:

The vision statement in the NHLS places a high value on all Australians being able to make informed decisions about their health across the lifespan and is supported by the Australian Naturopathic Council (ANC).

The vision aligns with the advocacy of the ANC and long-term principles of the Australian naturopathic profession it represents, as well as the World Naturopathic Federation (WNF) and World Health Organisation (WHO), of which it is a member. The preventative orientation of naturopaths contributes to alleviating the burden on public healthcare systems by promoting the health of consumers and preventing further movement into the healthcare system. The core philosophy of naturopathy incorporates the practice of preventive medicine and identification of the cause of illness in an individual, using nutritional and lifestyle measures by encouraging healthy behaviours, sharing appropriate health literacy to the patient and self-responsibility (Foley et al.,2020; Steel, Tiveron, et al., 2020).

The NHLS draft vision mentions "The success of the Strategy in delivering on the draft vision will depend on practical and implementable actions and leadership by government, the health sector and the community."

By working with naturopaths to better understand the population that are using their services, the government and the NHLS will ultimately help the population make better informed decision about their health care.

Naturopathic practitioners are proactive in producing and sharing public health information with their patients (through clinical consultations) and the public (through mass and social media). Meanwhile, many Australians are dissatisfied with available health services, distrust government-provided messages, and have unmet health needs which drive them to seek help for their health problems from sources which may not align with government messaging (Howard et al., 2013; Rozbroj et al., 2019) The outcome is that Australians may be just as, if not more, likely to consume public health information disseminated by Complementary Medicine practitioners (including naturopaths) than from government-coordinated channels and this public health information may be misaligned with government public health messages. (Barreto, 2017) This engagement is likely to be even greater among sectors of the community disenfranchised from mainstream health care. (Rozbroj, 2019).

We also do not know the degree to which public health information naturopathic practitioners share with their patients and the public, is evidence-based and aligned with the national strategies and initiatives, or how it is situated relative to other public health information accessed by the Australian public. Combined, these gaps place the Australian community at risk by undermining the effectiveness of current and future government health promotion activities; a particular concern in the context of current global health challenges such as the COVID-19 pandemic that require a heightened level of health promotion coordination and implementation (NHAA, 2021; Boisvert, 2021). Engaging with the naturopathic profession can scaffold and safety net these risks. As such, the government urgently requires insights into naturopathic practitioners' contribution to health promotion to fully realise the Strategy's vision (Steel, 2022).

#### References:

Barreto JE, Whitehair CL. (2017). Social Media and Web Presence for Patients and Professionals: Evolving Trends and Implications for Practice. *PM R*. 9(5S), S98-S105. doi: 10.1016/j.pmrj.2017.02.012. PMID: 28527508.

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8 Are the key principles captured? If not, what is missing? (See pages 8-9)

Yes

What are the Key Principles?:

The Australian Naturopathic Council (ANC) agrees that all the principles are captured and emphasises that naturopaths play a key role to the delivery of comprehensive and effective preventative health care. Below are examples of how naturopaths can be integrated into the Principles for Action:

Apply an equity lens

The ANC fully supports health equity for the proposed target populations.

People most in need of healthcare are least likely to seek it or receive it. This is because of the effect of illness itself on people's body and mind, and the impact of the social determinants of health (such as poor health literacy, poverty, marginalisation) (Hart et al., 1971).

For many unwell or at-risk individuals, accessing a health professional is a substantial obstacle. For people who cannot overcome this obstacle, it means that people accessing clinical care will be unrepresentative and results from research on these populations will be biased (Greenhalgh et al 2015).

Preventative health, being the backbone of naturopathic practice, reduces the burden on the healthcare system substantially.

Address cultural and linguistic diversity

The World Health Organisation (WHO) recognises that traditional and complementary medicine (T&CM) is an important yet undervalued part of health care and recommends the potential contribution it has to health, wellness and people centred health care (World Health Organization, 2013).

Naturopathy is a distinct system of T&CM with a patient-centred preventative emphasis which is recognised by the WHO (World Health Organization, 2013) and this aligns with the Strategy aim to reduce cultural and other inequities.

Vulnerable populations that have been acknowledged as areas of concern are Aboriginal and Torres Strait Islander people, migrant and refugee populations, those with low socioeconomic status, those living in rural and remote communities, and those experiencing disability, ageing, and homelessness (Smith et al., 2021).

Be people and community centred

Most knowledge translation models pay relatively little attention to patient-held knowledge and are largely based on the premise that researchers and clinicians hold all valuable knowledge, and patients are passive recipients of such knowledge. Counter to this clinician- and researcher-centred lens, is a growing interest and awareness of patients as experts in their health. Naturopathic medicine is described and experienced as a patient-centred system of traditional medicine. (Steel et al., 2022).

Address needs across the life-course

In addition to general practitioners, naturopathic practitioners are one of the few other primary health care practitioners who follow people across the lifespan. While naturopaths are already embedded in the health system and accessed by the community for acute and chronic health complaints, their full value for health literacy cannot be realised without being incorporated into a coordinated plan across all health services.

With the high rate of women using naturopaths for primary care, naturopaths provide continuity of care from preconception to early childhood. The Australian Government has a responsibility to facilitate improved health literacy around these life-stages.

Ideally, naturopathic practitioners should be part of an integrated healthcare team to ensure better outcomes and experiences for the patient, including preconception and early childhood health. Naturopaths play a role in facilitating care and treatment across different life stages: for a pregnant woman, the critical years in utero; early childhood; school age children; adolescence; healthy workplaces; hospitals; and aged care environments. Healthy diet promotion and education are key aspects to support patients with chronic conditions including national priority areas such as obesity, type 2 diabetes, and cardiovascular disease (Foley et al., 2020a; Steel et al., 2017). Including expertise from the naturopathic profession would play a significant role in preventing disease across all stages of life (Baird et al., 2017).

Be evidenced-based

The critical engagement of the expertise of consumers, communities, and health care professionals, including naturopathic practitioners, will provide valuable insight into generating research for informing the health of Australians. Many naturopaths are active within research and evaluation, and often specialise in chronic diseases such as cardiometabolic diseases, mental health, and obesity (Steel et al., 2021). In fact, naturopaths receive more federal government funding for research than chiropractors, osteopaths, physiotherapists, nurses, pharmacists and, psychologists, (Steel et al 2019). It is appropriate for the Australian Government continue to provide support for naturopathic-specific research funding to investigate the implementation of naturopathic services throughout Australia

The evidence-base supporting naturopathic care in the prevention and treatment of health conditions is constantly evolving and we urge those responsible for implementing the strategy to remain abreast of this evidence. Similarly, naturopathic practitioners have been characterised as early adopters of new health-related evidence and practices, and as such can be a valuable asset in catalysing the change required to transform the health system from its current illness-focus to place a higher priority on wellness and prevention (Bradley et al., 2019).

However, patient experience needs to be considered just as valuable a part of the evidence base alongside research evidence. In fact, in Greenhalgh et al. (2015's) paper, titled "Six 'biases' against patients and carers in evidence-based medicine", the second Bias discussed is that "evidence-based medicine 's hierarchy of evidence devalues the individual patient experience." We need to integrate the clinician's experience with the best research evidence in order to improve outcomes for the patient. (Greenhalgh, et al.2015)

Also, Steele et. al (2022) found patient-shared knowledge – inclusive of patient experience of their health condition – is among the knowledge used and trusted by naturopathic practitioners to inform their clinical decision-making. The findings of this research offer insights into the knowledge translation behaviours of an under-researched health profession and provides a novel contribution to the wider aim of adopting patient-shared knowledge into clinical care more generally (Steel et al., 2022)

#### Be practical and implementable

While naturopaths are already embedded in the health system and accessed by the community for acute and chronic health complaints, their full value for health prevention cannot be realised without being incorporated into a coordinated plan across all health services. The Australian government urgently requires insights into naturopathic practitioners' contribution to health promotion to fully realise the NHLS key principles.

Ideally, naturopathic practitioners should be part of an integrated healthcare system to ensure better outcomes and experiences for the patient. Naturopaths are a source of knowledge and information that can support and inform policy, strategy and service delivery that meets the needs of a wider sector of the community. As stated previously, many Australians consult with naturopaths as a source of primary health care and as such the health system action should also consider the contribution of naturopaths to optimise the health literacy delivery.

Unfortunately, despite their growing and highly significant presence in the Australian health system, naturopathic practitioners are commonly overlooked in the design and implementation of government health policies and strategies (e.g., the Strategy) and current knowledge translation models are characterised by assumptions of professional and occupational infrastructures that are under-developed or lacking entirely in naturopathic professions. At best this oversight reflects an untapped opportunity for effective public health information dissemination, and at worst may result in consumers receiving conflicting or inaccurate public health information that undermine preventive health efforts (Sommariva, 2018). For the Australian community to receive clear, consistent public health messages across all primary care providers, naturopathic practitioner public health information must coordinate with government-led health promotion initiatives.

The ANC also acknowledge it is difficult for the government to include naturopaths as they are not a registered profession. This is despite all efforts to the contrary over the past 15 years by the profession to seek registration. More context on this is provided in question 9 of this survey.

#### References:

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9 Are the aims the right ones for achieving the vision of the National Health Literacy Strategy? (See pages 10-13)

Yes

Achieving the vision of the National Health Literacy Strategy :

The Australian Naturopathic Council (ANC) agrees with the aims for achieving the vision of the NHLS, and naturopaths could play an important role, with all 3 aims, however the ANC places focus here on Aim 1.

As outlined previously in this survey response, naturopaths are a longstanding, significant component of the health care landscape and have gone unnoticed by the preventive health field to date. The core philosophy of naturopathy incorporates the practice of preventive medicine and identification of the cause of illness in an individual, using nutritional and lifestyle measures by encouraging healthy behaviours, health literacy and self-responsibility (Foley et al., 2020; Steel, Tiveron, et al., 2020). We also acknowledge it is difficult for the government to include naturopaths as they are not a registered profession. This is despite all efforts to the contrary over the past 15 years by the profession to seek registration.

A report was commissioned by the Victorian State Government in 2005 to investigate the need for statutory registration of naturopaths and Western herbal medicine (WHM) practitioners. The report, entitled "The Practice and Regulatory Requirements for Naturopathy and Western Herbal Medicine" recommended that registration of naturopaths and Western herbal medicine (WHM) practitioners is needed. In 2008, this report was tabled at the Council of Australian Governments but was not actioned because the NRAS was only just being developed and the government prioritised inclusion of professions that were already registered in some form at a national or state level. (Wardle, Steel, McIntyre, 2013; ANC 2020) Registration focuses on providing several protections to ensure the public are accessing safe and effective healthcare from appropriately qualified health practitioners. Every assessment under these criteria has recommended that naturopaths should be registered (Osteopathy Chiropractic and Naturopathy Committee, 1975; Lin V, Bensoussan A, Myers, 2005).

In the absence of statutory registration, the Australian Register of Naturopaths and Herbalists (ARONAH) has been set up to mirror AHPRA and benchmark education and ethical standards for the profession (Wardle, Steel, Casteleijn, Bowman, 2019) ARONAH (who is a member of the ANC) continually lobby all levels of government, to be considered for statutory registration under AHPRA.

And despite the lack of statutory registration, government must engage with naturopaths in this space. The absence of this engagement will be detrimental to the strategy, as a large part of the health care landscape will be missing from the framework.

References:

ANC (2020) <https://www.naturopathiccouncil.org.au/2020/06/09/why-do-we-need-registration-regulation-of-the-naturopathic-profession-in-australia/>

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Wardle, J, Steel, A, McIntyre, E, (2013) Independent registration for naturopaths and herbalists in Australia: the coming of age of an ancient profession in contemporary healthcare. Australian Journal of Herbal Medicine. 25(3)

10 Do you have any example actions that could be considered under each aim? (See pages 11, 13 & 14)

Aim 1: Systems, policies and practices within and across sectors support an effective health literacy environment:

Harnessing the skills of naturopaths and incorporating this profession into coordinated plans across all health services will further enhance the described policy achievements for the focus areas.

We have established that the core philosophy of naturopathy incorporates the practice of preventive medicine and identification of the cause of illness in an individual, using nutritional and lifestyle measures by encouraging healthy behaviours, health literacy and self-responsibility. (Foley et al., 2020; Steel, Tiveron, et al., 2020) And we have also established that a large part of the Australian population consults with naturopaths each year (6.2%) and most of these their naturopath as their primary provider (59.6%); In fact, almost a quarter (22.2%) see naturopaths as their sole primary care provider (Wardle, J, Steel, A, Casteleijn, D, Bowman, D. 2019).

References:

Foley, H., Steel, A., & Adams, J. (2020). Consultation with complementary medicine practitioners by individuals with chronic conditions: Characteristics and reasons for consultation in Australian clinical settings. Health & Social Care in the Community, hsc.13072. <https://doi.org/10.1111/hsc.13072>

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a healthy lifestyle?: A secondary analysis of the Australian longitudinal study on women's health. *BMC Complementary Medicine and Therapies*, 20(1), 349. <https://doi.org/10.1186/s12906-020-03153-6>

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Aim 2: All Australians can access health information that is easy to understand, trustworthy and culturally appropriate:

Naturopaths are committed to supporting consumers and patients to access reliable and credible sources of health information, as well as providing information in an accessible and easy to understand format to the community in general. There are many subpopulations in Australia that seek naturopathic practitioners to support their health concerns. With the Australian government working alongside the naturopathic profession, this may be a way to disseminate trustworthy health literacy information to a patient base that may not be fully trusting of government messages.

As stated previously, many naturopathic patients are dissatisfied with available health services, and distrust government-provided messages. This has driven many to seek help for their unmet health needs from alternative sources which may promote public health ideas not aligned with government messaging (Howard et al., 2013; Rozbroj et al., 2019). Identifying and understanding the (non)alignment of their health promotion activities with government public health messaging is crucial to the NHLS fulfilling on its promise to the Australian community. (Steel, 2022)

References:

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Aim 3: All Australians have the skills to find and use reliable health information across the varied media they use:

In addition to the naturopath-led activities mentioned earlier, the national and global naturopathic profession is also actively involved in community education, as evidenced by this information video recently commissioned by the World Naturopathic Federation which showcased simple lifestyle, and dietary advice for disease prevention:

<https://youtu.be/l0gKAfpWF2g>

11 Are the categories for the leaders and partners who will mobilise health literacy action appropriate? (See page 14)

Other. Please specify.

Leaders and Partners mobilising health literacy action:

All health professions who play a key role in preventative health care should be part of the health literacy action plan. The ANC has established through this NHLS feedback process that Naturopaths are a key participant in this area of health. And although we acknowledge it is difficult for the government to include naturopaths as they are not a registered profession (despite all efforts to the contrary over the past 15 years by the profession) we also emphasise that we have a valuable contribution to make.

The ANC encourages all key partners, and leaders, along with the Government to reach out to the World Naturopathic Federation (WNF) recognised Australian naturopathic associations (NHAA, CMA,) and voluntary registration body (ARONAH) for expertise consultation in this area. The WNF represents over 70 naturopathic organizations from all WHO Regions, and their role includes promoting and supporting the global naturopathic profession. (<https://worldnaturopathicfederation.org/about-wnf/>)

12 Please provide any other observations and advice that you have not had the opportunity to make on the Framework:

Any further observations and advice on the Health Literacy Framework:

The intention for a more holistic strategic focus on wellbeing needs to reflect an equitable consideration of prevailing cultural and individual healthcare needs and choices and be responsive to health seeking behaviour in the community. The guiding principles of naturopathic practice include illness prevention, person-centred healthcare, and health promotion throughout all life-stages. The treatments employed by naturopathic practitioners commonly include encouraging healthy lifestyle choices and providing nutritional/dietary prescription.

Naturopaths are a valuable source of knowledge and information that can support and inform policy, strategy and service delivery that meets the needs of a wider sector of the community. As stated previously, many Australians consult with naturopaths as a source of primary health care and as such the NHLS should also consider the contribution of naturopaths to optimise preventive health service delivery.

And despite the lack of statutory registration, government must engage with naturopaths in this space. The absence of this engagement will be detrimental to the strategy, as a large part of the health care landscape will be missing from the framework.

For these reasons, the naturopathic profession needs to be considered in the implementation of the Strategy and will ensure that all available resources are applied to achieve the strategy vision and aims to support health literacy.