

Response ID ANON-JSKW-NVKV-4

Submitted to ANZSCO comprehensive review - consultation round 2
Submitted on 2023-08-11 14:02:07

Introduction

1 What is your first name?

First name:
Hannah

2 What is your last name?

Last name:
Boyd

3 What is your organisation?

Organisation:
Naturopaths & Herbalists Association of Australia

4 What is your position/title?

Position/title:
President / Director

5 Which state are you located in (or country if overseas)?

NSW

Other country (please specify):
Australia

6 What is your email address?

Email:
h.boyd@nhaa.org.au

7 What is your phone number?

Phone number:
0409027443

8 How did you find out about the Comprehensive review and update of ANZSCO?

Colleague or other internal notifications

Other (please specify):

Focus area

9 Please select a focus area

Medical, nursing and other health care services

Occupations that are separately identified in ANZSCO

10 Are there any occupations in your industry, business or workplace that are not accurately described?

Details of occupations in your industry, business or workplace that are not accurately described:

252213 Naturopath

1. Provide your proposed new title, alternative title, definition, specialisations, licensing and/or registration requirement (whichever apply). Refer here for more information on title, alternative title, definition, specialisations, licensing and/or registration requirement.

a. Title of Naturopath is correct

b. Definition – recommended to align with international standards (World Naturopathic Federation). This more accurately reflects contemporary naturopathic practice.

c. New definition recommendation of:

Provides a system of health care based on traditional philosophies and principles utilising evidence-based practice to apply a wide variety of tools and techniques such as diet and lifestyle education, nutrition and herbal medicine plus other practices and techniques to achieve health for a patient.

The definition is aligned with the World Naturopathic Federation (WNF) definition of Naturopathy available at: <https://worldnaturopathicfederation.org>. The World Naturopathic Federation represents over 70 naturopathic organizations from all World Health Organisations (WHO) Regions(1).

The role of the WNF is to:

- support and promote the naturopathic profession globally,
- to support regulation and recognition of the naturopathic workforce,
- to promote accreditation and the highest in educational standards for the global naturopathic profession and
- to encourage and support naturopathic research

Regarding registration or licencing: we confirm this statement is correct.

Currently, the Naturopathic profession in Australia is self-regulated through several professional peak bodies. Based on the potential for public health risk due to insufficiently qualified practitioners, the naturopathic profession is lobbying for professional registration within the next 5 years. Evidence of naturopathic efficacy, safety and economic viability is available via the Health Technology Assessment (HTA), a 720-page publication (2). The full HTA is available as an e-book at: <https://worldnaturopathicfederation.org/project/health-technology-assessment-naturopathy/>

Regarding Skill Level 1 of bachelor degree or higher qualification: we confirm bachelor's degree as the minimum level of qualification for naturopathic practice.

For context, the Community Services and Health Industry Skills Council (CSHISC) withdrew its support for the Advanced Diploma Naturopathy and recommended that Australian Qualifications Framework Level 7 (bachelor's degree) better aligned with the needs of the profession. The recommendations were accepted by the Complementary & Alternative Health Industry Reference Group in May 2014 with a teach out date for the qualification enforced in December 2018 (3). This alignment to a bachelor's degree as the new minimum educational standard, was agreed upon by the majority of the key professional bodies. Ensuring Skill Level 1 is maintained is critical to distinguish the minimum level of qualification required for practice.

Regarding the Unit Group Name from "2522 Complementary Health Therapists".

Recommend an update to "Integrative Health Therapists".

Complementary Medicine is now considered out-of-date and exclusionary. The World Health Organisation (WHO) Traditional Medicine strategy supports the term "Integrative Health" that more accurately reflects safe, respectful, accessible and cohesive healthcare. Updating the term "Complementary" is important to reflect contemporary norms used by government, practitioners, and users of traditional and complementary therapies (4). This re-naming of the category is important to reflect best practice for integrating traditional and complementary medicine into biomedical health systems (5).

2. Provide a list of any unique tasks which distinguish this occupation from others included in ANZSCO.

Not applicable: we agree with the tasks lists provided in the category 2522 Complementary Health Therapists.

3. Include any evidence to support your proposed changes, such as industry workforce surveys, workplace awards, job vacancy data, industry workforce planning documents, or job descriptions.

Evidence to support the proposed change is listed as:

World Naturopathic Federation definition: <https://worldnaturopathicfederation.org>.

Health Technology Assessment e-book: <https://worldnaturopathicfederation.org/project/health-technology-assessment-naturopathy/>

World Health Organisation, Traditional Medicine Strategy 2014-2023: <https://www.who.int/publications/i/item/9789241506096>

World Health Organisation, Global Report on Traditional & Complementary Medicine 2019: <https://apps.who.int/iris/handle/10665/312342>

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

4. Describe how the inaccurate description of this occupation affects your industry, business or workplace.

The Australian Naturopathic workforce is estimated to be around 15,000 practitioners, with an estimated 4 million naturopathic consultations annually (6,7).

Naturopaths are an underutilised resource for health promotion and practical health education in the community (8). The naturopathic definition is recommended to be updated to reflect the foundations of naturopathic philosophy that guides the implementation of treatments such as nutritional and herbal medicine as well as traditional and contemporary practices and lifestyle prescriptions (1,6).

11 Are there any occupations in your industry, business or workplace for which ANZSCO does not accurately reflect the skill level (1 to 5)?

Occupations which do not accurately reflect the skill level (1 to 5):

1. Outline the skill level (1-5) that should be assigned to the occupation. NA

2. Include any evidence to support the change, such as changed education, training or licencing requirements, occupation data, industry workforce surveys, job vacancy data, or workplace awards. NA

3. Describe how the inaccurate skill level affects your industry, business or workplace. NA

12 Are there any occupations in your industry, business or workplace which we should consider classifying under a different ANZSCO category (e.g. sub-major, minor or unit group)?

Occupations to classify under a different ANZSCO category:

1. Include any evidence to support the change you are proposing (such as skill transferability with minimal retraining required). NO
2. Describe how the current placement affects your industry, business or workplace. NO

Occupations not separately identified in ANZSCO

13 Are there any occupations in your industry, business or workplace that should be separately identified with a unique code?

Occupations that should be separately identified:

1. Describe the occupation as fully as possible, including the tasks involved; its relationship to other occupations; any registration or licensing requirements; the education and experience requirements; its skill level (1 to 5), and any other titles used to describe the occupation.

Western Herbalist

Definition: provides a system of health care using herbal preparations that contain active plant constituents to prevent and treat illness and disease.

Tasks involved align with Unit group 2522 Complementary Health Therapists.

- Uses a system of health care to apply herbal medicines that contain active constituents to prevent and treat illness and disease.
- Tasks involved align with the description of 2522 Complementary Health Therapist:
- assessing patients to determine the nature of the disorder, illness, problem or need by questioning, examining and observing
- developing and implementing treatment plans using applications such as acupuncture, homoeopathic and herbal medicine, and dance, drama, hypnotic and music therapies
- evaluating and documenting patients' progress through treatment plans
- providing dietary and lifestyle advice and guidelines
- prescribing natural medicines, such as herbal, mineral and animal extracts, to stimulate the body's capacity for self-healing

Western herbal medicine is a core discipline of naturopathic medicine.

Skill level 1: Bachelor degree or higher qualification is required for practice.

For context, the Community Services and Health Industry Skills Council (CSHISC) withdrew its support for the Advanced Diploma Western Herbal Medicine, and recommended that Australian Qualifications Framework Level 7 (bachelor's degree) better aligned with the needs of the profession. The recommendations were accepted by the Complementary & Alternative Health Industry Reference Group in May 2014 with a teach out date for the qualification enforced in December 2018 (3). This alignment to a bachelor's degree as the new minimum educational standard, was agreed upon by the majority of the key professional bodies. Ensuring Skill Level 1 is maintained is critical to distinguish the minimum level of qualification required for practice.

Registration or licensing may be required.

Currently, the Herbal Medicine profession in Australia is self-regulated through several professional peak bodies. Based on the potential for public health risk due to insufficiently qualified practitioners, the herbal medicine profession, will join the naturopathic effort to lobby for professional registration within the next 5 years. Evidence of naturopathic efficacy, safety and economic viability is available via the Health Technology Assessment (HTA), a 720-page publication (2). The full HTA is available as an e-book at:

<https://worldnaturopathicfederation.org/project/health-technology-assessment-naturopathy/>

Other titles: Western Herbal Medicine Practitioner

2. Indicate the number of people that undertake the occupation in your industry, business or workplace. Estimate the number of people that will be required to undertake the occupation in 5 years' time in your industry, business or workplace. Where possible, use evidence to support the estimates you provide.

A 2022 industry audit indicated there are 6,000 herbalists, with approximately, 5,000 identifying as both a naturopath and herbalist. Herbal medicine is a core modality required in naturopathic training courses. The naturopathic workforce is estimated to be approximately 15,000 practitioners. Herbal Medicine higher education course growth in the last 6 years is approximately 250%. The number of people expected to undertake the occupation in the next 5 to 10 years is 500 people. This projection is based on the enrolment figures of the only Australian Bachelor of Health Science (Western Herbal Medicine) course delivered by Torrens University Australia (9). These estimates indicate a future strong growth in the herbal medicine profession. Recognition of the unique skill set of this specialised profession is recommended as a single category.

3. Identify where you think this occupation sits within ANZSCO.

Recommended under the category of : 2522 Complementary Health Therapists or more appropriately named Integrative Health Therapists. See comments made under the category of naturopath.

4. Would adding this occupation as a specialisation of an existing ANZSCO occupation category meet the needs of your industry, business or workplace? Why? / Why not?

Adding the occupation as a specialisation of an existing ANZSCO occupation category is not appropriate for herbal medicine therapists. Herbalists are distinct from naturopaths who are trained to a higher degree to apply natural therapies, practices and techniques. The categorisation of Western Herbalist is accurately grouped as a unique category

14 Are there occupations that are emerging, or that you anticipate will emerge, in the next 5 to 10 years in your industry, business or workplace?

Occupations that are emerging:

1. Describe the occupation as fully as possible, including the tasks involved, its relationship to other occupations, any registration or licensing requirements, the education and experience requirements, its skill level (1 to 5), and any other titles used to describe the occupation. NO
2. Indicate the number of people you expect will undertake the occupation in your industry, business or workplace in the next 5 to 10 years. Where possible, use evidence to support the estimates you provide. NO
3. Explain what is driving the emergence of the occupation. NO
4. Identify where you think this occupation sits within ANZSCO. NO

Other information

15 Is there any other information to help support your submission?

Other information to support submission:

This submission represents the views of peak industry body the Australian Naturopathic Council (ANC). The purpose of the ANC is to support the quality, viability and sustainability of the naturopathic profession in Australia. Representatives are:

- Australian Register of Naturopaths and Herbalists (ARONAH)
- Complementary Medicine Association (CMA)
- Endeavour College of Natural Health (ECNH)
- Naturopaths and Herbalists Association of Australia (NHAA)
- Southern Cross University (National Center for Naturopathic Medicine) (SCU)
- Torrens University

16 Please provide information on any other issues in relation to ANZSCO that have not already been covered in this survey.

Any other issues not already covered:

1. World Naturopathic Federation [Internet]. 2022 [cited 2022 Nov 30]. Available from: <https://worldnaturopathicfederation.org/educational-members/>
2. Lloyd I. Health Technology Assessment. Section 1: Foundational Basis of the Naturopathic Profession. Canada; 2021.
3. Frawley J. Bachelor Degree the Minimum standard 2014. Australian Journal of Herbal Medicine. 2014;28(3):84.
4. World Health Organization. WHO traditional medicine strategy. 2014-2023. 76 p.
5. World Health Organization. WHO global report on traditional and complementary medicine 2019. 226 p.
6. Australian Naturopathic Council. What is Naturopathy? [Internet]. [cited 2023 Aug 10]. Available from: <https://www.naturopathiccouncil.org.au/what-is-naturopathy/>
7. McIntyre E, Adams J, Folley H, Harnett J, Leach MJ, Reid R, et al. Prevalence of Use and Characteristics. Journal of Alternative & Complementary Medicine. 2019;25(2):181–8.
8. Steel A, Schloss J, Leach M, Adams J. The naturopathic profession in Australia: A secondary analysis of the Practitioner Research and Collaboration Initiative (PRACI). Complement Ther Clin Pract. 2020 Aug 1;40.
9. Smith C, Shew T, McLachlan C. Torrens University - TCM education provider in Australia. Int J Ayurveda Res. 2022;3(2):155.