



Submission
by
National Herbalist's Association
of Australia
on the
Inquiry into the Desirability
Of A National Higher Education
Accreditation Body

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Executive Summary

- This document has been prepared by the National Herbalists Association of Australia (NHAA), which has represented the interests of professional Western Herbalists Medicine (WHM) practitioners and Naturopaths in Australia since 1920.
- The NHAA supports a National Higher Accreditation Process.
- The NHAA considers that national standards will add to the educational standards of the country and improve the portability of skills across jurisdictional borders.
- The NHAA believes standards need to be set in consultation with professional associations and institution giving regard to both professional and educational issues.

Introduction and Background to the National Herbalists Association of Australia

The NHAA is the key professional Association representing appropriately qualified Western Herbalists and Naturopaths using herbal medicines as their primary treatment modality. It is the oldest professional association of complementary therapists, founded in 1920, with a current full membership of 936 (our total membership is 1461 including student and companion members). This represents approximately one third of practising Herbalists and Naturopaths in Australia. The NHAA is the only national professional association specifically concerned with the practice and education of Western Herbal Medicine (WHM).

The primary aims of the NHAA are to:

- Promote, protect and encourage the study, practice and knowledge of medical herbalism.
- Disseminate such knowledge by talks, seminars and publications.
- Encourage the highest ideals of professional and ethical standards.
- Promote herbal medicine within the community as a safe and effective treatment option.

The Full Membership of the Association elects the Board of Directors of the NHAA, with each member serving a two-year voluntary (unpaid) term after which they may stand for re-election.

Full members of the NHAA have completed training in Western Herbal Medicine sufficient to meet the educational standards as determined by the Examiners of the Board in consultation with tertiary education institutions (standards inclusive of but exceeding the requirements of the NSW Health Training Package), and must adhere to a comprehensive Code of Ethics and Continuing Professional Education (CPE).

Since its inception, the NHAA and its members have been at the forefront of herbal medicine and have been influential in areas ranging from education and practice standards, to government regulation and industry standards. The NHAA has a strong

commitment to achieving high educational standards in herbal medicine practice and supports regulation of the profession.

Membership is mainly practitioners of Western Herbal Medicine including Naturopaths who choose to use herbal medicine as their major modality of practise.

The Desirability of a National Higher Education Accreditation Body

General Discussion

The NHAA is in support of any reform that will standardise the education outcome for the professions of Herbal Medicine and Naturopathy.

The NHAA as a professional accreditation body sets a standard that has become the benchmark for herbal training within the Vocational Education & Training (VET) sector. This is evidenced by the direct adoption of the NHAA's course accreditation system into the Health Training Package (HTP) used as the national standard for training and recognition of Herbalists and Naturopaths undertaking Herbal medicine training. Since this time the NHAA has revised our standard upward and now have requirements beyond the HTP for full membership of the association.

The NHAA holds that the standard for practitioners of Herbal Medicine needs to be set at a minimum level of a degree as these practitioners often act in the role of primary health care practitioners. This level of training would also support the NHAA's call to make the practice of herbal medicine a regulated profession.

It is of concern to the NHAA that in some states, notably Queensland and South Australia, VET sector assessors insist that the HTP is the standard and institutions may not exceed or teach beyond this standard in anyway. The NHAA believes any harmonisation of National Higher Education Accreditation would need to avoid being overly proscriptive as this is a recipe for mediocrity within the profession.

Whilst universities have undergone NHAA accreditation of their natural therapy courses, this accreditation is in fact a qualitative review to ensure the courses met the membership

requirements of the association. In most cases the courses have met this standard but there has been a notable instance where this has not been true.

The NHAHA believes a harmonised national accreditation system would give the appropriate guidance to all higher education institutions in curriculum design with the aim to meet the current professional standard.

We have attached our course accreditation guidelines for your information.

The NHAHA will address questions 2, 5d & 8 in our submission as we believe these are the areas where we can best contribute to the discussion.

Response to Consultation Questions

2. How do you assess the advantages and disadvantages, as outlined in section 3 above, of the current arrangements in relation to:

a. national consistency; and

b. the efficiency of the current relationship between accreditation and quality audit functions?

Are there advantages/disadvantages not covered?

a) The advantages in having a standard criteria for national higher education accreditation is all courses and institutions will produce graduates with a standardised minimum level of education and will allow for the easy transport of skills throughout the various jurisdictions of the country and meet any professional or regulatory requirements of graduates.

Whilst this is a very desirable outcome, it could be argued that the disadvantage to such a system is a lack of flexibility leading to stifling of new and creative programs within the system. Ensuring any national standard is a minimum standard that any institution may exceed to create a marketing or reputational advantage for participants in their programs can easily negate any perceived disadvantage.

The risk of any model lies in its interpretation across all sectors. An example of this can be seen in the VET sector where RTO's on occasion appear to be in conflict with Vet sector assessors and professional accreditation bodies in meeting the required standards of both where they differ greatly.

b) Under the current system of course accreditation in Herbal Medicine and Naturopathy each institutions course material must be 'mapped' to the quality audit system used by the NHAA. This is a time consuming and onerous task for both the personnel of the institution and of the NHAA, particularly as institutions (private sector) usually must undergo either their own quality audit mechanisms or those of the Office of Higher Education also. Such overlap of auditing mechanisms is not efficient and may also be at cross-purposes delivering poor assessment outcomes. A harmonised approach to accreditation based on National Protocols, which have been devised with full consultation of all stakeholders, would provide more efficient and meaningful outcomes for institutions

5. For each national body option under both harmonised and uniform models, how should it be configured in terms of the following factors?

- a. Roles, functions and decision-making powers;**
- b. Governance arrangements;**
- c. Resourcing requirements;**
- d. Relationship between the body and professional accreditation schemes; and**
- e. Relationship between the body and AUQA.**

d. Should National harmonisation occur based on the revision of National Protocols the setting of any such standards must include the canvassing of a wide variety of stakeholders before such protocols are decided on. The NHAA suggests that all stakeholders including students, professional associations and educational institutions be consulted prior to implementation of a National Harmonisation Model.

8. Are there other issues and considerations that should be taken into account?

The NHAA accredit Office of Higher Education courses and expect the majority of courses in the complementary medicine profession to eventually fall into that sector. Currently this accreditation is done by quality audit and is not a government recognised accreditation process. In essence, this means the institutions offering these courses have two masters to satisfy as a consequence.

This situation causes extra work within institutions, as graduates undertaking education in Complementary Medicine usually require membership of the NHAA or other professional associations in order to practice.

Currently there is no harmonisation or indeed, communication between accreditation bodies and unrecognised professional bodies such as the NHAA that set standards for the profession. We recognise that this is not always true as in the case of CPA Australia.

This results in a conflict between professional standards required for practice and education delivery. National harmonisation opens an opportunity to create a model promoting communication between accrediting professional bodies and OHE quality assurance bodies.

The NHAA welcomes and stands ready to be involved in any consultative process.

Attachments

1. NHAA course accreditation guidelines