



## Scope of Practice Review - Issues Paper 2 Public Submissions

### About you

Are you completing this survey on behalf of an organisation, or as an individual ?

Organisation

### About you - organisation

What best describes the type of organisation you are answering for?

Professional association

### Leadership in primary care

What leadership do you consider important to ensure reforms are successfully implemented? For example, what is required at the professional, practice, organisation and/or profession level?

Leadership requirements:

The profession of Naturopathy is categorised as an allied health profession by the Australian and New Zealand Standard Classification of Occupations (1). The profession is self-regulated with the Australian Naturopathic Council (ANC) (2) representing higher education providers and professional association

members of the World Naturopathic Federation (3) .

- Australian Register of Naturopaths and Herbalists (ARONAH)
- Naturopaths and Herbalists Association of Australia (NHAAs)
- Complementary Medicine Association (CMA)
- Endeavour College of Natural Health, and
- Torrens University Australia
- Southern Cross University (SCU)

The ANC represents sectors of the naturopathic professional who advocate for the highest practice standards and public safety. However, other sectors of the profession support industry recognised Advanced Diploma qualifications.

For context, the minimum standard of education as set by the government is Bachelor degree (4). The Community Services and Health Industry Skills Council (CSHISC) withdrew 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 (4). This alignment to a bachelor's degree as the new minimum educational standard, was agreed upon by the majority of the key professional bodies.

Based on the potential for public health risk due to insufficiently qualified practitioners, the Naturopathic profession, are lobbying for professional registration with the Australian Health Practitioners Regulation Agency (AHPRA) (5). Evidence of naturopathic efficacy, safety and economic viability is available via the Health Technology Assessment (HTA), a 720-page publication (6). The full HTA is available as an e-book at: <https://worldnaturopathicfederation.org/project/health-technology-assessment-naturopathy/>

1. Australian Standard Classification of Education. 0619 Complementary Therapies. Australia: Australian Bureau of Statistics; 2024. Available from: <https://www.abs.gov.au/statistics/classifications/australian-standard-classification-education-ascend/2001/field-education-structure-and-definitions/definitions/06/0619>
2. Australian Naturopathic Council. 2024. Available from: <https://www.naturopathiccouncil.org.au>
3. World Naturopathic Federation. 2024. Available from: <https://worldnaturopathicfederation.org>
4. Frawley J. Bachelor Degree the Minimum standard 2014. Australian Journal of Herbal Medicine. 2014;28(3):84.
5. Australian Naturopathic Council. Naturopaths Regulation Research Project. 2023. [cited 2023 Aug 11]. Available from: <https://www.naturopathiccouncil.org.au/naturopaths-regulation-research-project/>
6. Lloyd I. Naturopathy: Practice, Effectiveness, Economics and Safety [Internet]. Steel A, Wardle J, editors. World Naturopathic Federation: Toronto. Toronto: World Naturopathic Federation; 2022 [cited 2023 Aug 11]. Available from: <https://worldnaturopathicfederation.org/project/health-technology-assessment-naturopathy/>

### **Workforce design, development and planning**

To what extent do you believe the combined options for reform will address the main policy issues relating to education and training and employment practices you have observed in primary health care scope of practice?

Somewhat

### **Please provide any additional comments. :**

Future planning should incorporate funding for traditional, complementary and integrative health (TICH) professions such as naturopathy. This strategy aligns with the WHO recommendations for harnessing TICH practitioners to engage with prevention, health promotion and treatment. The naturopathic profession is a key resource in reorienting healthcare systems from a disease model to a person-centred healthcare model.

The naturopathic profession has proactively produced a health technology report. The HTA is an evidence-based summary of naturopathic practices and outcomes of care. This document clearly provides evidence of naturopathic efficacy, safety and economic viability in a 720 page publication available as an ebook at <https://worldnaturopathicfederation.org/project/health-technology-assessment-naturopathy/>

University research institutes such as Southern Cross University, University of Technology Sydney, University of Western Sydney and Torrens University Australia are dedicated to complementary medicine research. Southern Cross University has a dedicated naturopathic research centre (<https://www.scu.edu.au/national-centre-for-naturopathic-medicine/>). These centres provide infrastructure for Australian patient-centred integrative health research.

**What other implementation options should be considered to progress the policy intent of these options for reform? To what extent will these policy options support full scope of practice?:**

NA

**What additional actions relating to leadership and culture should be considered to encourage decision-makers to work together in a cooperative way to achieve the intent of these policy options?**

**Are there implementation options which have not been considered? :**

An open-minded culture is necessary to progress TICH incorporation into medical systems. Consulting with naturopathic leadership through the Australian Naturopathic Council (ANC) is recommended. Outcome based research and feasibility studies will increase the body of evidence related to cost-effectiveness, disease burden and health status.

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Naturopaths are an underutilised workforce in the area of integrated health promotion and health education (1). Inclusion of naturopathic care into mainstream health models has advantages of providing individualised person-centred care that meets national health priorities of:

- Building capacity to strengthen resilience to emerging health and climate threats and emergencies
- Improving health of ATSI peoples, gender diverse, minority and vulnerable groups
- Building capacity for innovative research in health services
- Preventing and managing multimorbidity and chronic conditions

1. 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;40.

**Last word**

**Are there additional reform options which have not been considered that could progress the intent of this Review?**

**Any additional reform options:**

Thank you for the opportunity to participate in the Scope of Practice Review. Please contact ANC member organisation contact details for further collaboration.