

Australian Natural Therapists Association Ltd

Submission to:

Mr Kim Snowball
Independent Reviewer

appointed by

Australian Health Ministers' Advisory Council

to review the

National Registration and Accreditation Scheme
for the Health Professions

10th October 2014



The Australian Natural Therapists Association Ltd (ANTA) would like to thank the Australian Health Ministers' Advisory Council (AHMAC) for commissioning an independent review into the National Registration and Accreditation Scheme (NRAS) for the health professions. ANTA would also like to thank AHMAC for inviting ANTA to make a submission on the NRAS review.

ANTA was founded in 1955 and is the largest national democratic association representing the interests of multi-modality natural therapy professionals who work in the area of health care and preventative medicine.

ANTA:

- provides an egalitarian representation of all disciplines/modalities accredited by the association
- regulates and maintains education and qualification requirements for accreditation of natural therapy professionals
- possesses infrastructure, systems, policies, procedures and resources which enables the association to encompass all aspects of the profession
- represents the interests of individual disciplines/modalities
- acts as advocate for practitioners of all disciplines/modalities accredited by the association
- promotes the health and safety of consumers of traditional medicine and natural therapy health services
- provides course assessment and course recognition services for the natural therapy profession

The disciplines/modalities recognised and accredited by ANTA are:

Acupuncture
Ayurvedic Medicine
Homoeopathy
Nutrition
Remedial Massage Therapy
Musculoskeletal Therapy
Shiatsu

Aromatherapy
Chinese Herbal Medicine
Naturopathy
TCM Remedial Massage
Myotherapy
Western Herbal Medicine
Counselling



ANTA is committed to continuous quality improvement and providing the public with the highest possible standards for the conduct and safety of traditional medicine and natural therapies in Australia.

ANTA is committed to improving the skills of practitioners, advancing the standing of the natural therapy profession, public safety and working for the inclusion of natural therapy disciplines including Naturopathy, Western Herbal Medicine, Nutritional Medicine, Homeopathy, Musculoskeletal Therapy, Myotherapy, Remedial Massage, Shiatsu, TCM Remedial Massage and Aromatherapy in the NRAS.

Since 1955 ANTA has been a major participant and contributor to the ongoing improvement and upgrading of qualifications and skills in the natural therapy profession.

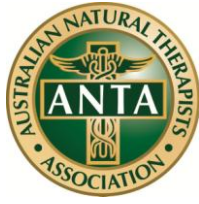
ANTA believes regular and timely reviews of the NRAS are necessary to ensure the NRAS operates in a transparent, accountable, efficient, effective and fair way and to provide the public with quality health care services.

The natural therapy profession has over the years been actively involved in progressing qualifications from certificate to Diploma to Advanced Diploma and to Bachelor Degree levels.

Reviews of qualifications and skills over this period has seen the profession develop and grow to a level where natural therapy practitioners in many instances are now regarded as primary health care service providers.

Natural Therapies are an important and significant part of the health care sector and it is essential the natural therapy profession adopts and embraces continuous quality improvement and is included in the NRAS.

The natural therapy profession has in recent times come under close scrutiny from many areas and it is essential the natural therapy profession clearly demonstrates a strong commitment to continuous quality improvement and is included in the NRAS.



The Consultation Paper relating to the review of the NRAS outlines a range of questions and ANTA is pleased to respond to the following questions.

1. ANTA believes the introduction of the NRAS has been a positive step in the regulation of health professionals and protecting the public interests and safety.

ANTA believes it is essential there is a mechanism that measures performance of the NRAS as a whole and how the NRAS delivers on the four key objectives set out in the National Law.

ANTA supports AHMAC being appointed to provide independent reporting on the operation and performance of the NRAS.

2. ANTA submits it is essential that Natural Therapy health professions are added to the NRAS to ensure the public is protected and that qualification standards are established for safe practice on a national level.

Adding of Natural Therapy professions to the NRAS can be completed in several ways and ANTA recommends a staggered approach in the following groupings:

First Group: Naturopathy, Western Herbal Medicine, Nutritional Medicine & Homeopathy.

Second Group: Musculoskeletal Therapy, Myotherapy, Remedial Massage, Shiatsu, Traditional Chinese Remedial Massage and Aromatherapy

The consultation paper states research has shown the number of members of a profession impacts significantly on both the cost and effectiveness of registration.

ANTA estimates there are 30,000 Natural Therapists covering the above groups and when included in the NRAS will provide significant savings, benefits and economies of scale to the existing 9 professions in the



NRAS that currently have high costs, high fees but have lower regulatory workloads.

3. The Consultation paper suggests operation of the current NRAS is not efficient in terms of human and financial resources and significant savings up to \$11 million per annum can be achieved by introducing efficiencies and restructuring.

ANTA supports initiatives to implement human resource efficiencies, improve economies of scale and to achieve financial savings through shared regulatory functions in the NRAS.

4. ANTA supports savings achieved through efficient use of human resources, economies of scale and financial restructuring being passed onto practitioners by way of lower registration fees.
5. The consultation paper provides information that indicates complaints handling can also benefit from an overhaul and establishing a single entry point for complaints from the public in each state and territory.

Based on the information provided, ANTA supports a single entry point being established in each state and territory for lodgement of complaints by the public.

6. The associations representing the professions of Naturopathy, Western Herbal Medicine, Nutritional Medicine and Homeopathy have been engaged in a long drawn out process managed by the Community Services and Health Industry Skills Council (CSHISC) to review and establish Bachelor Degree qualifications as the entry level for the professions.

The processes and systems employed by CSHISC to manage the review after a long drawn out consultation process has failed to reach a decision despite the majority of the associations representing these professions voting in favour of establishing Bachelor Degree as the entry level to the profession.



The failure of CSHISC to reach a conclusion on this matter despite majority support from the professions of Naturopathy, Western Herbal Medicine, Nutritional Medicine and Homeopathy has the potential to put the health and safety of the public at risk as a result of Advanced Diploma qualifications being restructured and realigned at non professional levels.

As potential exists for educational standards at Advanced Diploma level to be downgraded, it is essential the professions of Naturopathy, Western Herbal Medicine, Nutritional Medicine and Homeopathy are included in the NRAS and that Bachelor Degree qualifications be established as the entry level for these professions.

7. ANTA supports the Australian Health Workforce Advisory Council (AHWAC) being appointed to provide Ministers with expert advice on a range of matters including:
 - Annual assessment of all regulators by jurisdiction
 - Independent advice for changes in standards
 - Reporting on actions taken to improve access to health services
 - Undertaking research and analysis of performance
 - Entry of professions into the NRAS

8. The entry of the professions of Naturopathy, Western Herbal Medicine, Nutritional Medicine, Homeopathy, Musculoskeletal Therapy, Myotherapy, Remedial Massage, Shiatsu, TCM Remedial Massage & Aromatherapy into the NRAS will provide significant economies of scale, efficiency savings and reduced costs for registration and ANTA recommends that this takes place as soon as possible.