

SUBMISSION

Prepared by:

AUSTRALIAN NATUROPATHIC PRACTITIONERS ASSOCIATION (ANPA)



AUSTRALIAN NATURAL THERAPISTS ASSOCIATION (ANTA)



AUSTRALIAN REGISTER OF HOMOEOPATHS (AROH)



COMPLEMENTARY MEDICINE ASSOCIATION (CMA)



NATIONAL HERBALISTS ASSOCIATION OF AUSTRALIA (NHAA)



To

COMMUNITY SERVICES & HEALTH INDUSTRY SKILLS COUNCIL (CS&HISC)

On

Alignment of Advanced Diplomas of Naturopathy, Homoeopathy, Nutritional
Medicine & Western Herbal Medicine to Bachelor Degree level

6th August 2014

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This submission is being lodged by the above associations/registers who represent the majority of the professions of Naturopathy, Homoeopathy, Nutritional Medicine & Western Herbal Medicine to re-affirm full support for the alignment of qualifications for these modalities/disciplines at Bachelor Degree level.

The above associations fully support the consultative process undertaken by the CS&HISC to allow for open and transparent discussion and decision making.

The consultative process included all Industry Reference Group and Subject Matter Expert Group members, CS&HISC stakeholders including Registered Training Organisations & professional associations. All stakeholders were invited to lodge submissions with CS&HISC and the majority of stakeholders support and continue to support the alignment of qualifications at Bachelor Degree level.

The CS&HISC provided the following analysis of submissions received:

- The work of CAH practitioners undertake and perform does align to the Bachelor Degree level as per the AQF descriptors
- Existing Advanced Diploma training is already at least in part aligned to Bachelor Degree level—both in terms of content and the volume of learning
- There is majority support for the transition to Bachelor Degree qualifications with removal of Advanced Diploma qualifications from the Health Training package
- The majority of those in favour of transition are also aware of the importance of the need for adequate time to achieve this

The associations/registers party to this submission are collaborating to assist in the setting of standards for Bachelor Degree programs for naturopathy, homoeopathy, nutritional medicine & western herbal medicine and the associations/registers agree:

- Regular & timely reviews of qualifications and standards are necessary to ensure the natural therapy profession continues to grow and provide the public with quality health care services.
- Natural therapy practitioners are in many instances regarded by the public as primary health care service providers
- Natural therapies are an important part of the health care sector and it essential the profession adopts and embraces continuous quality improvement particularly in the area of qualifications and educational standards
- The natural therapy profession has in recent times been under close scrutiny and it is imperative the profession clearly demonstrates a strong commitment to continuous quality improvement
- The alignment of qualifications in Naturopathy, Homoeopathy, Nutritional Medicine and Western Herbal Medicine at Bachelor Degree level is critical for the advancement and overall standing of the profession
- Advanced Diploma qualifications have served the profession well for a considerable time however the community now requires practitioners to be able to act as independent professionals or specialists and demonstrate:
 - Skills to exercise critical thinking and problem solving
 - Skills to critically review and analyse information and knowledge
 - The knowledge and ability to act independently

- The ability to adapt knowledge and skills in diverse contexts

The above attributes are typically found in Bachelor Degree programs.

The current practice of Naturopathy, Homoeopathy, Nutritional Medicine & Western Herbal Medicine is in line with the AQF definition of professional: *Professional work and/or learning are contexts requiring specialised knowledge, advanced learning, responsibility and autonomy, and require intensive preparation through learning.*

Whereas, the definition of paraprofessional: *Paraprofessional work and/or learning are work contexts that generally support professional practice* is not in accordance with current demands and the practice of Naturopathy, Homoeopathy, Nutritional Medicine & Western Herbal Medicine.

The distinction between paraprofessional and professional as it relates to current best practice is central to the reasoning and logic underpinning the alignment of qualifications to Bachelor Degree level.

There are a significant number of colleges currently offering Bachelor Degree programs in Naturopathy, Homoeopathy, Nutritional Medicine & Western Herbal Medicine with numerous other colleges working towards the introduction of Bachelor Degree programs in 2015. In recent years there has been a significant shift away from Advanced Diploma qualifications with the majority of students now enrolling in Bachelor Degree programs.

The profession is rapidly moving towards Bachelor Degree as the benchmark qualification and it is imperative qualifications for Naturopathy, Homoeopathy, Nutritional Medicine & Western Herbal Medicine are aligned at Bachelor Degree level outlined under the plan published by CS&HISC.

The associations/registers party to this submission and representing the majority of the profession are aware an association does not support the alignment of qualifications to Bachelor Degree level and the associations/registers lodging this submission also wish to make it clear they do not in any way support or endorse the views or position of that association.

The associations/Registers wish to acknowledge the initiative by the CS&HISC in undertaking a full open and transparent review of qualifications and will continue to work together to ensure Bachelor Degree programs become the benchmark qualification for the professions of Naturopathy, Homoeopathy, Nutritional Medicine & Western Herbal Medicine.