

A review is currently under way to assess the effectiveness of the current model of health practitioner regulation in Victoria.  
 Schedule 3A

Department of Human Services  
 Health Workforce Policy

2002/2003 Service Plan

<b>Service Provider</b>	La Trobe University as lead agency for a consortium comprising University of Western Sydney, Australian Centre for Complementary Medicine Education and Research, RMIT University, Cochrane Group on Consumer Information and Communication and the National Herbalists Association Australia.
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<b>Service</b>	Research project on risks, benefits and regulatory requirements for the professions of naturopathy and Western herbal medicine (WHM).
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<b>Funding</b>	<p><b>Profile of risks of naturopathy and WHM</b>  <b>Profile of benefits of naturopathy and WHM</b>  <b>Profile of educational and training arrangements for practitioners</b>  <b>Profile of professional associations and extent of institutional recognition and support for the practice of naturopathy and WHM</b>  <b>Profile of the General Practitioner workforce providing naturopathy/WHM services</b>  <b>Profile of consumers and their views on naturopathy and WHM</b>  <b>Profile of regulatory arrangements for naturopathy &amp; WHM/recommendations for reform</b>  <b>Project management</b></p>
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Pay first 3 core activities and first component of activity 4 - June 2003 - \$90,000  
 Pay balance on receipt of reports - \$90,000

<b>2003 funding.</b>	\$180,000
<b>GST</b>	\$ 18,000
<b>TOTAL 2003</b>	<b>\$198,000</b>

<b>Term of Service Plan</b>	Commencement Date: 15 <sup>th</sup> June 2003 Finishing Date: 30 <sup>th</sup> June 2004
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<b>Service Aim</b>	To investigate and understand the practice of the naturopathy and Western herbal medicine (WHM) in Australia, and make recommendations on the need, if any, for measures to protect the public.
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## Objectives

- To identify the scope and nature of practice of the professions of naturopathy and WHM, and the characteristics of the workforce in Australia.
- To understand the reasons patients choose naturopathy and WHM, and any concerns or issues they have.
- To understand the risks and benefits associated with the practice of naturopathy and WHM.
- To identify the extent to which members of registered health professions are adopting naturopathic and WHM modalities and their training in these modalities.
- To identify referral patterns and links between naturopathy/WHM practitioners and other health care providers.
- To profile the education and training available to persons entering and practising these professions, and assess its adequacy.
- To understand the aims and activities of professional associations representing practitioners of naturopathy and WHM.
- To identify the extent of institutional support for the practice of naturopathy and Western herbal medicine in Australia.
- To assess the impact of regulatory arrangements on the practice of naturopathy and WHM in Australia and overseas.
- To assess the features of naturopathy and WHM against the AHMAC Criteria for Assessing the Need for Statutory Regulation of Unregulated Health Occupations.
- To explore models of regulation and other measures to protect consumers of naturopathy and WHM.

## Activities

- A review of Australian and international literature, research and data on naturopathy and WHM.
- A review of current evidence of risks and benefits of naturopathy and WHM.
- A profile of the naturopathy and WHM workforce.
- A review of the coverage, content and adequacy of educational arrangements for naturopathy and WHM practitioners.
- A review of regulatory arrangements for the complementary medicine professions in Australia and overseas, identifying the level of institutional support.
- An assessment of the activities of representative bodies covering the professions, including their involvement in self-regulatory activities.
- A survey of consumer views about the practice of naturopathy and WHM.
- A report on findings, including an assessment of the naturopathy and WHM professions against the AHMAC Criteria
- Options for future regulation and measures to protect the public.

## Service Standards & Guidelines

Towards a Safer Choice: The Practice of Traditional Chinese Medicine in Australia

**Core Activity One – Prepare profile of nature and extent of risks associated with practice of naturopathy and Western herbal medicine**

- Conduct a systematic review of the literature on risks associated with the practice of naturopathy and Western herbal medicine, including a search of the following resources to identify adverse effects:
  - Biomedical databases,
  - ADRAC, Drug Information Services
  - bibliography searches,
  - litigation searches, coroners' reports, court records,
  - newspapers
  - Various government surveillance and complaints bodies;
  - Professional association records
  - Other international sources.
  - Categorise risks
  - Analyse scale and severity of risk, compared with other professions.
- Assess and summarise reports made to Australian authorities or recorded on databases of adverse events, and data on adverse events obtained from the Australian Workforce Survey of naturopathy and Western herbal medicine conducted by UWS and SCU in conjunction with NHAA and FNNTT.

**Core Activity Two – Prepare status report on evidence concerning the nature and extent of benefits associated with practice of naturopathy and Western herbal medicine.**

- Conduct a literature search and report on the extent and quality of scientific research in the following areas:
  - Clinical trials of herbal medicine, homoeopathy and nutritional medicine
  - Nature and extent of pharmacological research activities in herbal medicine.
- Identify extent to which systematic reviews have been conducted in relation to naturopathy/WHM and the findings of these reviews.
- Report on areas where there is potential for public health benefits from use of naturopathy/WHM, with particular focus on national public health priority areas.

**Core Activity Three – Prepare a profile of the naturopathy/WHM workforce including the extent to which other registered practitioners such as medical practitioners are practising naturopathy/WHM.**

- Conduct literature review
- Analyse available workforce data including from 2003 NHAA/FNTT funded workforce survey and other sources.
- Report on:
  - Numbers of practitioners.
  - Qualifications of practitioners.
  - Location of practices.
  - Hours of practice (full time, part time, sessional etc).
  - Diagnostic methods used.
  - Treatments offered.
  - Modalities employed.
  - Technology used.
  - Record keeping procedures.
  - Knowledge and use of infection control procedures.
  - Adverse events experienced in practice.
  - Professional indemnity insurance arrangements.
  - Participation in continuing professional development activities.
  - Attitudes to regulation.
- Conduct survey, analyse data and report on General Practitioner use of modalities of naturopathy/WHM including:
  - Nature of use, modalities employed
  - Extent of training
  - Issues arising.

**Core Activity Four – Prepare status report on nature, extent and adequacy of educational arrangements for training of professionals in naturopathy and Western herbal medicine in Australia.**

- Conduct survey and establish profile of educational courses that provide entry level qualifications (award and non-award programs if any) in Australia for practitioners of naturopathy and Western herbal medicine, including
  - Initial identification and consultation with educational providers
  - Preparation of survey tool
  - Conduct of survey
  - Analysis of data
- Identify and report on:
  - types of institutions providing naturopathy/WHM education in Australia
  - nature of programs - degree, advanced diploma, diploma, certificate etc
  - nature of course accreditation mechanisms and standards
  - affiliations between institutions and with overseas institutions
  - course requirements in relation to basic and medical sciences, naturopathy/WHM theory and practice, clinical subjects
  - total contact hours
  - clinical requirements
  - methods of assessment
  - student profile and graduating practitioner numbers
  - staffing profile including academic and support staff, naturopathy/WHM teaching staff, medical sciences staff.
  - course consultative mechanisms and other quality assurance arrangements
  - extent and nature of research activities
- Report on the quality and extent of development of naturopathy/WHM education in Australia

**Core Activity Five – Prepare status report on nature and extent of institutional support for professions of naturopathy and Western herbal medicine including professional association representation.**

- Conduct survey and establish profile of the organisations representing practitioners of naturopathy/Western herbal medicine in Australia, including groups representing other health occupations that have adopted naturopathy/Western herbal medicine treatment modalities. This will include:
  - Type of association, legal status.
  - Brief history
  - Size, number and types of members in each State
  - Criteria for membership
  - Aims
  - Continuing education requirements of members
  - Protocols for dealing with complaints and discipline
  - Codes of ethics and practice guidelines
  - Course accreditation standards and processes
  - Peer review and other quality assurance processes
  - Affiliations with other associations and government/ non-government bodies
  - Views on the role of government in regulation of the complementary medicine professions.
  
- Identify and comment on the extent of institutional (government and non-government) support for or involvement in the practice of naturopathy and Western herbal medicine. Identify the involvement/policy positions of bodies such as:
  - Public and private hospitals and community health services
  - Educational authorities - TAFE and Higher education, ANTA
  - Third party insurers such as private health funds and workcover/traffic accident insurers.
  - Australian Taxation Office - GST free status.
  - Commonwealth and State Health authorities.
  - Professional indemnity insurers
  - Referral networks and links between practitioners of naturopathy and Western herbal medicine and other health care providers.
  - Extent of use of naturopathy/Western herbal medicine by other registered health care professionals.

**Core Activity Six – Prepare profile of consumer views about the practice of naturopathy and Western herbal medicine.**

- Assess and provide summative report on existing research on consumer use of naturopathy/WHM, including patient satisfaction data.
- Report on available patient profile data including from the 2003 NHAA/FNTT funded patient profile and other sources, including:
  - Demographics of patients using naturopathy/WHM
  - Education level
  - Employment status
  - Health insurance coverage
  - Level of inter-referral and dual patient care with other health care workers
  - Nature of medical conditions
  - Frequency and cost of consultations
  - Form of treatment administered
  - Pharmaceutical medication concurrently used.
- Set up and run focus groups to gauge consumer views concerning naturopathic and WHM services including:
  - Extent of use of naturopathy/WHM
  - Reasons for use of naturopathy/WHM
  - How practitioners are selected
  - Satisfaction with naturopathy/WHM services
  - Issues if any with use of over the counter medications and self prescribing
  - Issues if any with concurrent use of conventional and complementary medicine providers
  - Issues if any with concurrent use of Western pharmaceuticals and WHMs
  - Views on need if any for more consumer protection/government regulation
- Prepare report results of consumer focus groups.

**Core Activity Seven – Prepare status report on regulatory arrangements in Australia that impact on the practice of naturopathy and Western herbal medicine.**

- Conduct a literature review to identify international and Australian developments in the regulation of complementary medicine professions in general and naturopathy/WHM in particular.
- Identify the nature of regulatory frameworks existing in other countries for the regulation of naturopathy/WHM, in particular in the European Community, UK, Canada, USA and New Zealand.
- Identify the nature of current regulatory controls at Commonwealth, State/Territory and local government level, including:
  - Federal Therapeutic Goods Act regulation of herbal preparations.
  - Practitioner registration and/or licensing arrangements.
  - Health complaints legislation.
  - State based powers to regulate potentially toxic or dangerous herbs via drugs and poisons regulation.
  - Consumer protection and fair trading legislation.
  - Local government regulations if applicable.
  - Other.
- Document recent developments in regulation of complementary medicine practitioners and medicines.

**Core Activity Eight: – Prepare final report including assessment of the professions of naturopathy and Western herbal medicine against AHMAC Criteria and make recommendations concerning measures required to protect the public**

- Analyse the data collected in the study and report on the extent to which the professions of naturopathy and Western herbal medicine meet the AHMAC Criteria for Assessing the Need for Statutory Registration of Unregulated Health Occupations.
- In particular, analyse the data on risks and make an assessment of the significance of harm to the health and safety of the public, taking into account:
  - The nature and severity of risk to the patient group
  - The nature and severity of risk to the wider public
  - The nature and severity of risk to practitioners
- Factors taken into account in assessing risk should include the extent to which:
  - equipment, materials or processes are employed that might cause a serious threat to public health and safety including diagnostic or treatment techniques;
  - failure of practitioners to practice in particular ways (that is follow certain procedures, observe certain standards, or attend to certain matters such as referral of patients for conventional treatment) may result in a serious threat to public health and safety
  - intrusive techniques are used that may cause a serious or life threatening danger
  - substances such as pharmacological compounds, dangerous chemicals or radioactive substances are used;
  - potential for damage to the environment or public health and safety.
- Make recommendations about the need if any for further measures, regulatory or otherwise to provide adequate protection to members of the public who use naturopathy/WHM.

**Other Requirements**

- Establish and implement communication strategy for key stakeholders and reporting schedule.
- Prepare and submit interim research report