

Australian Register of Naturopaths and Herbalists
PO Box 157
LISMORE NSW 2480

Via email to: submissions@aronah.org

Submission - Proposed Independent Naturopathic and Herbalist Register

Thank you very much for the opportunity to comment on the development of the Australian Register of Naturopaths and Herbalists. The NSW Health Care Complaints Commission commends the initiative and welcomes the regulation of this sector of alternative health services.

As you are aware, a Code of Conduct for unregistered health practitioners came into force in NSW in August 2008. The Code sets out the minimum standards expected of unregistered health practitioners and also makes it mandatory for these practitioners to inform their clients how they can make a complaint if they are concerned about the service that was provided to them.

We encourage you to adopt this Code of Conduct for future members of the Register of Naturopaths and Herbalists to ensure consistent standards across Australia.

Currently, the NSW Health Care Complaints Commission has extended powers to deal with complaints about unregistered health practitioners, including to investigate complaints and take action where it finds a breach of the Code of Conduct in NSW.

We encourage you to establish complaint handling procedures, whereby any complaints concerning NSW members of the Register, would be notified to the Commission to assess, and if required, investigate complaints about Naturopaths and Herbalists.

Similar arrangements exist with the NSW Registration Boards, and will also be part of the National Registration Scheme to come into force in July 2010.

The Commission has wide-ranging legislative power to deal with unsafe practices, including issuing public warnings and prohibition orders. We would be please to discuss in further detail cooperation in relation to dealing with complaints about NSW members of the Register.

In relation to the information provided on your website, we would like to ask you for a correction of the information that the NSW Code of Conduct applies retrospectively. The Commission has sought legal advice, which has clarified that the Code of Conduct does not apply retrospectively. Hence, the Commission has only extended powers in relation to unregistered practitioners where the conduct occurred on or after 1 August 2008.

We would appreciate it, if you could correct this information on your website
<http://www.aronah.org/faq-public.html>

Thank you again for the opportunity to comment on the development of the Australian Register of Naturopaths and Herbalists. We invite you to contact us to discuss future cooperation.

Please do not hesitate to contact Katja Beitat, Communications Officer, on (02) 9219 7497 or by email to kbeitat@hccc.nsw.gov.au.

Yours sincerely



Kieran Pehm
Commissioner
NSW Health Care Complaints Commission

17 NOV 2009