17 January 2011

Australian Register of Naturopaths and Herbalists PO Box 711 Fortitude Valley QLD 4006

Dear Sir/Madam

Submissions for accreditation and registration standards for naturopathy and Western herbal medicine

The Consumer Health Forum of Australia (CHF) welcomes the opportunity to provide input into the Australia Register of Naturopaths and Herbalist's (ARONAH) call for submissions on practice and registration standards for naturopathy and Western herbal medicine practitioners.

CHF is the national peak body representing the interests of Australian healthcare consumers. CHF works to achieve safe, quality, timely healthcare for all Australians, supported by accessible health information and systems.

CHF welcomes the establishment of practice, registration and accreditation standards for health care services. We have previously provided submissions on the National Registration and Accreditation Scheme (NRAS) which was established by the Council of Australian Governments (COAG) in March 2008. CHF welcomed the establishment of NRAS, as it has the potential to increase the safety and quality of health services. Health professionals will be assessed against national standards, closing the gaps and inconsistencies between the states and between professions.

We welcome the establishment of practice and registration standards for naturopathy and Western herbal medicine practitioners, as this is an area that is currently comparatively unregulated. However, without further information provided by ARONAH on the proposed practice, registration and accreditation standards, it is difficult for CHF to provide comprehensive comment.

CHF would recommend independent accreditation standards, which would ensure that registration of health professions is coordinated and consistent across Australia. CHF would also urge ARONAH to develop a complaints procedure for consumers to ensure consumers can provide feedback on naturopathy and Western herbal medicine practitioners.

The proposed standards should be developed with the principle that health care and policy implementation work better when consumers are partners in decision-making. Consumer consultation on the development of accreditation standards would enhance the proposed standards.

To ensure that consumer consultation is successful, ARONAH must:

- Undertake regular consumer consultation
- Collaborate with the community to promote shared development of accreditation standards
- Be required to report, publicly, on outcomes of the consultation in a timely, meaningful and accessible manner
- Involve consumers in the initial assessment of accreditation standards as well as regular review of standards once they are approved.

We appreciate being invited to comment on the development of the standards and we would be interested in participating in future consultations on this issue. If you have any questions or would like to discuss this further, please contact CHF Project Officer, Ms Sarah Watt, at: s.watt@chf.org.au or on (02) 6273 5444.

Yours sincerely

Carol Bennett CHIEF EXECUTIVE OFFICER