



Education Standards and Complementary Medicine Professions

EXECUTIVE SUMMARY

- There is a need for the continued recognition of Advanced Diploma graduates in the Complementary Medicine professions.
- Relying on a very small number of Bachelor program providers introduces a significant level of risk for the future of our professions.
- Professionally accredited Advanced Diploma programs produce well-trained graduates suitable for practice. Advanced Diploma programs may be better designed than a Bachelor program. There are many examples of Bachelor programs that failed to meet professional association accreditation standards.
- There is no minimum government accredited standard for Naturopathy. While Higher Education providers are regulated by TEQSA, their regulation is irrespective of the standards set by our professional associations.
- Being a Registered Training Organisation (RTO) is not a reliable measure of the integrity of an education provider or the quality of its training. Regulation of a training institution by ASQA or TEQSA does not prevent misconduct or sudden closure of an education provider.
- Graduates accredited by one or more specified professional associations meet the definition of a healthcare professional according to Schedule 1 of the Therapeutic Goods Regulations 1990. There is no legal stipulation preventing these graduates access to 'Practitioner Only' products and resources.
- Practitioner Only brands that refuse to service professionally accredited practitioners yet continue to supply other Allied Health professionals with no formal training in Nutrition or Herbal Medicine risk damage to their reputation, as well as a decrease in their revenue.
- Professional associations are proven to be more effective at regulation of our qualifications than government bodies. Reputable professional associations have published education standards, and accreditation can only be granted following a thorough review process.
- Switch on Health have extensive experience in natural therapies, in education, and in business. They have accreditation with more than one leading professional association. They are the only accredited natural therapies college to be owned and operated by an Australian Naturopath, and the only college to deliver an accredited qualification in Homeopathy. They play a crucial role in keeping natural therapies qualifications viable for many potential practitioners.





Scope and purpose of this paper

There is a misconception that graduates of ATMS accredited Advanced Diploma programs are less well-trained than graduates of Bachelor programs. This paper will show that this is not the case, and the reverse may even be true.

There is also a belief held by some in our profession that a Bachelor's degree should be the minimum education standard for our profession moving forward. This paper will challenge that assertion and provide several real-life examples that highlight the risks for our profession in relying solely on Bachelor program providers.

Complementary Medicine qualifications – background and history

To understand the debate surrounding complementary medicine qualifications, we must understand the history of how these qualifications have been regulated over the past two decades.

The AQF, ASQA, and TEQSA

The Australian Qualifications Framework (AQF) was first introduced in 1995. One of its functions is to designate relative skills and capabilities at different levels of qualification, such as the ability to apply knowledge and understanding, and act autonomously. Qualifications at Levels 1 through to 4 have 'Certificate' as their title (e.g. Certificate III in Fitness, Certificate IV in Massage Therapy). Level 5 qualifications are termed 'Diplomas', and level 6 are termed 'Advanced Diplomas'.

Levels 1 to 6 are seen as vocational in nature, and are usually delivered by TAFEs or private Registered Training Organisations (RTOs). Level 7 (Bachelor) and above are considered 'Higher Education' and delivered by universities or private Higher Education providers. Endeavour College of Natural Health is an example of a *private* Higher Education provider.

Vocational Education and Training (VET) qualifications are regulated by the Australian Skills Quality Authority (ASQA). Higher Education qualifications are regulated by the Tertiary Education Quality and Standards Agency (TEQSA).

It is important to note that Naturopathy and other Complementary Medicine (CM) modalities are not statutorily registered professions, and as such the government sets no minimum qualification for their practice. While this may seem alarming to some, the CM industry is considered low risk, has an exceptional safety record, and has also proven to be effective at self-regulation.





Self-regulation

There are many skilled and experienced practitioners still working today who attained their qualifications in the 1980s and 1990s. If we go back 25 years ago to 1998, and a prospective student was in Sydney and wanted to study Naturopathy, they most likely would have chosen between the two largest natural therapies colleges at that time: Nature Care College and the Australasian College of Natural Therapies (ACNT). Both colleges offered 'Advanced Diplomas' in Naturopathy, however these qualifications were *not* regulated by ASQA at that time. So how did a prospective student know if these were *bona fide* qualifications?

The answer lies in the role of our professional associations. These qualifications at both colleges were accredited by professional associations, such as ATMS, ANTA, and NHAA. This is what those wishing to study would have checked when comparing education providers. This form of industry accreditation provides an assurance that the graduate will have attained sufficient knowledge and skills, and will be recognised as a qualified practitioner within the industry. Furthermore, membership of such a professional association also provides benefits such as access to professional indemnity insurance, as the insurance companies will also be confident that the association has vetted members for their ability to practice safely and professionally. Healthcare consumers are also able to verify that a Naturopath advertising their services is a member of a relevant professional body.

Although there was no formal regulation by the government at that time, this arrangement of self-regulation by the profession worked well. The qualifications delivered by these colleges were very similar as they all had to meet professional association standards to be competitive in the marketplace. This arrangement was not unique to the CM profession, as many vocational industries operated in a similar manner.

The introduction of Training Packages and Units of Competency

During the 1990s, the governments of the time perceived a potential problem, which was that in theory, a 'Diploma' from one college might look quite different to a 'Diploma' from another college. In theory, it was possible that an employer or prospective student might not really know what the Diploma consisted of. An attempt was therefore made to *standardise* all vocational qualifications so that the skills and knowledge were clearly specified for any particular qualification. In theory, an employer or prospective student would know exactly what was contained in a qualification, and be assured of the same skills and learning outcomes regardless of which institution had delivered the training. When put into practice though, this





standardisation of qualifications had a detrimental effect on the quality and suitability of training for our profession. Standardisation was the goal, but ironically the opposite resulted, with more differences between qualifications appearing than were present under the previous profession's self-regulation.

Qualifications in various industries were grouped together and organised into Training Packages. CM qualifications were incorporated into the Health Training Package (HLT), which was first released in 2002. Qualifications belonging to a Training Package are given the definition of being *nationally recognised*. This definition applies to Training Package qualifications and is not related to industry recognition. Training Package qualifications are regulated by ASQA. To deliver a Training Package qualification, one must become a Registered Training Organisation (RTO). This will be discussed in more detail later.

Prior to standardisation of qualifications being implemented, a qualification delivered by Nature Care College or ACNT would have likely contained subjects with titles such as Nutrition 1, Nutrition 2, Nutrition 3, etc. Both colleges would have had a similar structure in their qualifications, such as macronutrients in first year, micronutrients in second year, and therapeutic application in third year. The *standardised* qualifications were completely different.

Vocational qualifications belonging to the AQF do not contain such 'subjects', but instead consist of 'Units of Competency'. Some Units appear in several Allied Health qualifications. A Unit of Competency specifies required knowledge and skills, methods of assessment, and evidence requirements for attainment of the Unit.

Subjects typically appearing in qualifications prior to the introduction of the Training Package may have titles such as 'Nutrition 2A – Vitamins' and 'Nutrition 2B – Minerals' and so on. It is very easy for an employer or prospective student to determine from a Subject Outline what has been covered. The content covered in Units of Competency in Training Package qualifications are far more obscure. Examples include 'HLTNU604C Manage work within a clinical nutritional framework' and 'HLTNU603B Apply a nutritional medicine diagnostic framework'.

One Unit of Competency found in all the CM Diplomas and Advanced Diplomas was 'CHCOR428A Reflect on and improve own professional practice'. You can imagine the challenge of attempting to teach this to a classroom of students who have not yet qualified, yet according to the National Centre for Vocational Education Research (NCVER), 120 hours of the total qualification should be devoted to this Unit ⁽¹⁾.

Note also that since the Training Package qualifications were vastly different to current accepted industry standards, they did not actually meet them. One notable omission from the Training Package qualifications was the requirement for the completion of Clinical Training hours ⁽²⁾. A college delivering an HLT qualification





would legally have to award the qualification upon completion of the Units of Competency, even if it failed to meet current accepted professional standards.

Colleges somehow had to map the courses that they were delivering to professionally accepted standards with the requirements of the Training Package. And since colleges came up with their own creative ways in which to complete this mapping, when someone transferred from one college to another, they may have been credited for a Unit of Competency and ended up missing out on essential content in their qualification, and/or repeating content that they had already done. This was because colleges mapped in different ways, but were legally obliged to recognise a Unit of Competency attained from a different college.

Importantly, Units of Competency are based on whether one can perform tasks *competently* or not. There is no grading. If one can demonstrate 'providing nutritional treatment', it does not matter whether they did a great job or a mediocre job. If they can demonstrate their ability to do this, they are deemed 'competent' and must be awarded the Unit.

This form of competency-based training is more suited to trades in which apprenticeships are common, such as 'on the job learning'. For example, in a car workshop, an assessor may request an apprentice mechanic to demonstrate an oil change, and then view employer records that show the apprentice has completed a number of oil changes on different vehicles. This may form sufficient evidence that the apprentice is competent in changing oil, at which point they may be awarded with the relevant Unit of Competency. This framework is ill-suited to complementary medicine, in which there is typically two years of training before a student even sets foot inside a Clinic.

It is a myth that graduates of an Advanced Diploma prior to 2019 received higher quality training than today's Advanced Diploma graduates. Current qualifications delivered by private providers have been designed by people with years of experience in both clinical practice and in education. They meet or surpass the education standards set by our largest professional association, ATMS, for what is deemed necessary for practice. They are free from the constraints of poorly assembled and inappropriately applied AQF Training Package regulations. They are more suited to today's environment, and are likely to produce more highly skilled practitioners than the previous nationally recognised courses delivered by RTOs.

The impact of VET FEE-HELP

The first Health Training Package was released in 2002. For several years, colleges such as Nature Care and ACNT continued to deliver Advanced Diploma programs according to professional accreditation standards. The HLT qualifications bore no





resemblance to these established accreditation standards. A graduate of an HLT qualification, having done exactly what was specified, would not have met the requirements for membership with any of our professional associations.

In 2007, the government introduced VET FEE-HELP (VFH). This is effectively a loan to the student to pay for their studies. This loan is only available for Diploma level and above, and only for *nationally recognised* courses (i.e. Training Package qualifications that are delivered by an RTO) ⁽³⁾.

Courses that are funded by VFH attract a 20% loading on the debt to be repaid to the government ⁽⁴⁾. For example, if someone self-funded their studies, the college may have charged them \$25,000 for their Advanced Diploma. Should the person wish to pay using VFH, the course would cost them \$30,000. Note – this loan does not go to the student! It goes to the RTO, who collect 80% of the total loan. The temptation to engage in predatory sales practices for some colleges was just too great.

The vocational education industry attracted many businesspeople intent on collecting as much government money as they could in the form of VFH. The sales and marketing departments of RTOs went into overdrive. There was extensive use of third-party sales agents, who received commissions for enrolments ^(5; 6; 7). There are many horror stories of unscrupulous business practices from the last decade. These included:

- Sales agents lurking outside Centrelink offices and offering a free laptop or iPad to someone who enrolls in their course ^(7; 8).
- People with physical disabilities and/or mental impairments being enrolled into courses for which they were entirely not suitable ^(5; 6; 9; 10; 11; 12; 13).
- Sales agents visiting indigenous communities and signing up multiple people within the same household ^(6; 7; 12; 13; 14).
- 'Students' obtaining inducements such as a free iPad, and signing up for several Diplomas, thus incurring multiple debts ^(6; 9).
- Colleges not providing the training for which the students had paid ⁽⁹⁾.
- Colleges making it unnecessarily cumbersome to withdraw from a course before the census date (a cooling off period), so that the student debt would be incurred ^(8; 9; 15).
- People being unaware that they even were enrolled in a course, and discovering the existence of their debt when filing their tax return ^(8; 9; 12; 14; 16; 17).

The sales agent collects their commission.

The college collects the government's money.

The 'student' incurs a debt to the government, often with nothing to show for it.

And the taxpayer foots the bill.





Unfortunately, the CM Advanced Diplomas were particularly attractive to these unscrupulous operators. Whereas some qualifications may have had a pre-requisite, such as a Cert IV in Massage Therapy (not eligible for VFH) being a pre-requisite for the Diploma of Remedial Massage, there were no such pre-requisites for the Advanced Diplomas. And since the Advanced Diplomas were such large qualifications, a large sum of VFH was there for the taking.

In what is a disastrous piece of government policy, colleges were able to set their own price for qualifications and bill the government accordingly ^(4; 7). In some cases, a college may have collected tuition fees from the government that were more than 10 times the market rate for that qualification ⁽¹⁰⁾. The rationale may have been that free-market economics meant that students would have been able to choose between a course that is expensive, or one that is better value. The reality is that for most people even reading this paper, this is the first they have heard of this, and there are still many trainers within the VET industry who do not fully understand what happened. Vulnerable students exposed to glossy marketing with high pressure and predatory sales techniques would have had no idea, and there are thousands of people who have incurred VFH debts and have nothing to show for it.

Colleges were able to 'front load' these qualifications so that the largest and most expensive Units of Competency, as decided by them, appeared at the beginning of the course. This maximised the potential profit for the college owners before their unsuspecting and dissatisfied students eventually withdrew. (Remember that Units of Competency bore no resemblance to subjects or any logical sequence in a qualification, which helped to make this front loading possible).

Even worse, students incurred their VFH debt based on whatever they had been billed for during a study period, and not what they had completed. Colleges may have billed for a Unit of Competency in the first study period, and 'delivered' the Unit over a period of more than one year, hence some students may have withdrawn after 1 or 2 years thinking they had completed several 'subjects' with a college, but received a Statement of Attainment with very few Units of Competency listed.

In 2009, someone wanting to study Naturopathy and/or Western Herbal Medicine would have been able to choose from approximately 43 colleges ^(18; 19). This number was quite literally decimated in a space of less than ten years. In the last decade (2010 – 2019), most colleges offering natural therapies closed down. Some were bought up by larger colleges. (For example, Think Education acquired ACNT and the Southern School of Natural Therapies (SSNT) in Melbourne). Other colleges simply went out of business, being unable to compete with the behemoths and their ruthless marketing campaigns.





Meanwhile in a parallel universe

Meanwhile, in the midst of a ballooning VET FEE-HELP scandal that was causing an embarrassment for the government, some stakeholders within our profession were lobbying for a Bachelor degree to become the minimum entry requirement for the profession moving forward. This move has been supported by some but not all of our professional associations.

These lobbyists were successful to some extent, and although not all stakeholders were in agreement, the Community Services and Health Industry Skills Council (CSHISC) agreed to remove the CM Advanced Diplomas from the Health Training Package in 2014. No RTO was allowed to enrol anyone into these qualifications after 2015, and the teach-out date was set at December 2018. Beyond 2018, it was illegal for any RTO to issue one of these qualifications. Students who did not enrol by 2015 and/or complete by 2018 would have no alternatives left other than to enrol in a Bachelor program.

(Incidentally, since no RTO could legally issue one of these HLT qualifications after 2018, this renders as meaningless the four year “grace period” put in place by some manufacturing companies to recognise RTO qualifications up to 2022 ^(20; 21). Although Nature Care College was still an RTO at that time, this bears no relevance to qualifications recognised by product suppliers. While Nature Care may have still been registered as an RTO between 2018 and 2022, their Advanced Diploma programs were not Training Package qualifications, and this period includes a time when they delivered some qualifications that were not accredited by ATMS).

Proponents of a ‘Bachelor minimum’ may seize upon the opportunity to point out that a Level 6 (Advanced Diploma) qualification, according to the AQF, does not match what we do as practitioners, and that a Level 7 qualification (Bachelor) is more appropriate ⁽²²⁾. They may use AQF descriptors as evidence, which state that Level 6 qualifications are suited to paraprofessional work, whereas at (Bachelor) Level 7, graduates will “demonstrate autonomy, well-developed judgement and responsibility in contexts that require self-directed work and learning.” ⁽²³⁾ We would argue that whatever the title of an ATMS accredited qualification in Naturopathy, graduates most definitely display these Level 7 attributes. (The use of the AQF to support this argument is also questionable, as will be demonstrated later).

When Switch on Health first approached ATMS for accreditation of its qualifications, we did not have ‘Advanced Diploma’ in the title. We wished to move away from the AQF designations and the utter mess that they had made in regulating CM qualifications. We originally wanted to call our qualifications e.g. ‘Practitioner Certificate in Naturopathy’ as we believed this was exactly what we were offering. However the ATMS education standards ⁽²⁴⁾ specify that the minimum award level be





“Equivalent to Advanced Diploma,” hence the use of an AQF title for our qualifications).

The point here is that while these qualifications have ‘Advanced Diploma’ in their title, they should not be considered in any way inferior to a Bachelor’s degree in the same field. Our graduates are not less well-trained. Our qualifications surpass the education standards set by ATMS, which is more than can be said for some Bachelor programs. For example, **the Bachelor of Health Science (Health and Lifestyle) offered by Southern Cross University does not meet ATMS requirements** ⁽²⁵⁾. Graduates of that Bachelor degree are required to undertake a fourth year of study at a Masters level in order to be eligible for membership with ATMS and other associations ⁽²⁶⁾. This fourth year incorporates the Clinical training that is considered so important by our professional associations and other stakeholders. To complete the Clinical training in the Southern Cross University program, one is required to have received a minimum of seven vaccinations against 11 infectious diseases, with ongoing annual vaccination requirements ⁽²⁷⁾. This is likely to deter many potential Complementary Medicine students as it may sit at odds with their perception of what Naturopathic Medicine is.

(It is also interesting to note here that there is one association that does accept graduates from this Bachelor program. Graduates are eligible to apply for membership with Complementary Medicine Association (**CMA**), **who will accept these Bachelor graduates even in the absence of any clinical training**. They will not, however, accept privately trained Naturopaths from an Advanced Diploma program with 400 hours of Clinic under their belt. Such is the ‘Bachelor minimum’ logic) ⁽²⁵⁾.

We can therefore see that this demand for a ‘Bachelor minimum’ is not truly based on education standards. It is more likely tied to the desire for statutory registration of Naturopathy. While the topic of registration is an extensive debate that belongs elsewhere, we believe that the likelihood of Naturopathy becoming a registered profession is extremely low. Firstly, we have an exceptional safety record, and therefore do not meet a criterion for registration, which is that there is significant risk of harm to the public from unregistered practitioners. Secondly, the removal of natural therapies from private health insurance rebates was a result of the NHMRC research that concluded that Naturopathy doesn’t work. While their research may have been flawed, it seems extremely unlikely that any Federal Government is going to contradict the taxpayer-funded study and admit that CM has a place in our healthcare system.

The current Advanced Diploma programs attract a particular calibre of student. No government funding in the way of VFH/VSL, Austudy/ABSTUDY, or HECS-HELP is available. Students are paying for their education out of their own pocket, they exhibit a high degree of autonomy, and are highly motivated. Most are of a mature age and come with life experience, with many having families and other societal commitments. Bachelor programs, on the other hand, tend to attract a younger





demographic on average due to the demands of university life, such as having to attend classes on-campus at particular times. It is important that our profession continues to accept capable and mature students without presenting high logistical and financial barriers to their study.

Is a Bachelor's degree the minimum government accreditation standard for Naturopathy?

An argument put forward by some is that a Bachelor's degree is the minimum government accredited standard for Naturopathy ⁽²⁸⁾. This is not true. The government sets no minimum standard for Naturopathy because we are not a registered profession. While a Bachelor's degree is indeed regulated by TEQSA, this has nothing to do with minimum standards for Naturopathy. For example, the Bachelor of Health Science (Complementary Medicine) previously offered by CSU and the Bachelor of Complementary Medicine previously offered by Endeavour College of Natural Health were both regulated by TEQSA, yet did not prepare graduates for practice, and were not accredited by professional associations. They taught people *about* complementary medicine, but not *how* to practice it.

The government has shown no interest in setting education standards for Naturopathy. The setting of these standards is the remit of our professional associations as a means of industry self-regulation.

Is there any significant difference between the current Advanced Diplomas and the Bachelor programs?

It has already been demonstrated that the current Advanced Diploma programs are far more suited to industry needs than the HLT qualifications that were delivered by RTOs. But how do they stack up against a Bachelor's degree?

Should you place our qualifications next to those of Endeavour College of Natural Health's, for example, you would find that they are very similar and highly comparable in terms of learning outcomes and the skills of the graduates. That said, each institution will have its own 'flavour' in which it delivers qualifications. Our focus at Switch on Health is in producing exceptional practitioners; not academics.

The Switch on Health team has extensive experience in clinical practice, education, and business. Our staff include a Clinic Coordinator and a Content Manager, as well as our experienced tutors and support staff. All our content is newly produced and up-to-date. For example, our final year content includes information on COVID-19





and vaccination issues, as well as MTHFR, pyrroles, acid-base balance, Lyme disease, and other contemporary topics. Our Content Manager is responsible for continual revision and improvement. This includes formal processes that we have in place to continually gather feedback from staff and students, and ensure that the feedback is acted upon.

Pathways to Higher Education

We recognise the importance of education standards, and the contribution that academia and research make to the CM profession. Our Advanced Diploma graduates are able to continue their studies at a Bachelor or Master's level should they wish. The Advanced Diplomas provide an important steppingstone for many. They enable one to enter the profession with more flexibility, at a lower cost, and without the significant barriers of geography and time constraints.

Endeavour College of Natural Health has mapped Switch on Health qualifications and a pathway to a Bachelor degree can be found on the '[Abacus](#)' feature of their website ⁽²⁹⁾. It is important to note that Higher Education institutions usually have a policy on the maximum amount of credit that can be awarded towards a qualification. In other words, this policy means no-one gets RPL'd for 100% of a course. The policy at Endeavour College of Natural Health is that no more than 25% can be credited from 'non-accredited' or 'non-formal' training (i.e. private qualifications that do not form part of a Training Package) ⁽³⁰⁾. This means that even if our qualifications match close to 100% of an Endeavour degree, they will not credit more than 25%. Nevertheless, our graduates have the ability to enter the profession and make a difference in people's lives, plus the ability to undertake further studies to upgrade their qualifications if they wish.

Opportunities for further study are also not limited to undergraduate (Bachelor) level. For example, the [University of Queensland](#) and the [Queensland University of Technology](#), among many others, state on their websites that it is indeed possible to undertake postgraduate studies without having a prior Bachelor's degree ^(31; 32).

Experts declare that the hierarchy separating Advanced Diplomas and Bachelor programs is an outdated concept that needs to change

The AQF has recently undergone a major review, chaired by Professor Peter Noonan. This review was finalised and published in September 2019, and the recommendations were accepted by the government in December of that year ⁽³³⁾. They are yet to be implemented, possibly due to the extensivity, complexity, and far-reaching impacts





of such reform. Dr Fowler (2022) speculates that the recommended reforms have been placed into the “too complex and hard basket” due to the far-reaching impacts that this overhaul of the AQF would have ⁽³⁴⁾. This indicates that there are significant flaws in the current AQF.

There are many recommendations and points made in the review that undermine the arguments by some that Bachelor's degrees are more appropriate for our profession. The review highlights many flaws in the existing Australian Qualifications Framework. It is stated in the review's executive summary that “The AQF has an overly rigid structure that hampers distinction between qualification types at the same level. This structure also imposes definitions that may undervalue some VET qualification types” ⁽³⁵⁾.

One of the key recommendations of the review is the restructuring of the AQF from 10 different *Levels* to 8 different *Bands*. It provides three possible options for the structure of these Bands. A feature common to all three of these options is the creation of a new qualification type: a **Higher Diploma**, which is placed in the same band as a Bachelor degree ⁽³⁵⁾.

The Panel who conducted the review believes that there should not be a separation of VET and Higher Education Diplomas or Advanced Diplomas, as this “could reinforce the perceptions of the lesser status of VET” ⁽³⁵⁾. Reiners (2019) explains that the review recognises that there is an “implied hierarchy” in the current AQF that undervalues VET qualifications and doesn't adequately recognise their contribution in industry sectors ⁽³⁶⁾.

Other key points from the review include:

- “Many people gain skills and experience in a variety of settings outside the formal education and training system.” To remain relevant, qualifications must adapt to the changing environment with regards to workers' skills and social needs, including how qualifications are delivered, and how skills and knowledge are recognised.
- There is a need for a smoother transition between VET and Higher Education, with less hierarchy between the two, and greater recognition of the diverse ways in which adults acquire knowledge and skills.
- The current AQF levels are “too rigid and overly hierarchical” and it is a flawed concept that skills and knowledge can be well defined and differentiated at ten different levels ⁽³⁵⁾.

‘Bachelor minimum’ is a high risk move for the profession

The decision taken by the Industry Skills Council to remove the Advanced Diplomas from the Health Training Package was made in 2014, having received various





stakeholder feedback. At that time, it may have appeared that a move towards a Bachelor minimum was logical and a good idea. The HLT qualifications failed to meet accepted industry standards. Colleges were struggling to reconcile the strict compliance demands of the Training Package with the requirements of our professional associations. Bachelor programs in Naturopathy were available at two public universities (SCU and UWS (now WSU)) and private colleges such as Think Education were working on developing their own Bachelor programs also. It may have appeared that the number of Bachelor programs was growing and becoming the norm. However since then, this movement has gone into reverse.

Western Sydney University discontinued its program. Southern Cross University also dropped their program in 2013, after running it for approximately 15 years. Southern Cross University recommenced a Bachelor in 2019, but this was only as a direct result of receiving a private donation of \$10 million from Marcus Blackmore ⁽³⁷⁾. This particular Bachelor program does not however meet ATMS standards as Clinical training is not included, and a fourth year at a Masters level is required for professional accreditation status ⁽²⁵⁾. **There are no public universities in Australia offering a professionally (ATMS) accredited Bachelor's degree in Naturopathy.** Reliance on studies at a Bachelor level falls upon two private providers.

Endeavour College of Natural Health has experienced several changes in ownership over the last few years. In 2014, they were acquired by Vocation Ltd ⁽³⁸⁾. A short time later, this holding company went into voluntary receivership, with the resulting loss of 150 jobs, \$700 million lost in market capital, and the threat of class actions ^(38; 39). Endeavour College of Natural Health was then acquired by Study Group Australia in 2015, who also acquired Brisbane's largest and most established natural therapies college, the Australian Institute of Applied Sciences (AIAS) ⁽⁴⁰⁾. Just two years later in 2017, Study Group Australia had their license to deliver vocational education revoked by ASQA for critical non-compliance ⁽⁴¹⁾. AIAS is now closed forever, and Endeavour College of Natural Health changed hands again. It is now owned by Allegro Funds, who are a private equity turnaround firm that typically hold assets for fewer than five years ⁽⁴²⁾. We can therefore expect a change in ownership again in the near future.

The other Bachelor provider is Torrens University Australia (TUA). Through a series of various mergers and acquisitions, TUA has ownership of both ACNT and SSNT ⁽⁴³⁾. ACNT and SSNT are examples of small family founded colleges with strong ties to the Australian Naturopathic community. ACNT was founded in 1982 by Chiropractor Frieda Bielik. SSNT was founded in 1961 by Naturopaths/Herbalists Alf and Judy Jacka ⁽⁴⁴⁾. In 2020, TUA was acquired by Strategic Education, a multinational listed on the NASDAQ ⁽⁴⁵⁾. Stewardship of the future education of our profession is far removed from its naturopathic roots.

Importantly, both Endeavour College of Natural Health and TUA have a history of discontinuing Bachelor and other programs that they once had on their scope. Only





one of them offers a degree in Western Herbal Medicine, and neither offer a degree in Homeopathy. ACNT has even ceased to deliver training in Massage Therapy, the bedrock on which the college was built. Their offerings are decreasing in number, and point to a disturbing trend. What happens if Naturopathy is no longer seen as profitable, as has already happened with other CM programs? It is unlikely that the shareholders or company directors will continue to deliver these programs out of a sense of altruism.

We have seen a similar trend unfold in other CM modalities, including those that already have statutory registration and have retained private health insurance rebates. Acupuncture was discontinued by VUT in 2012, UTS in 2019, and RMIT in 2023 ^(46; 47). This leaves only one public university remaining that delivers Acupuncture, and three private providers. Just last week (August 2023), RMIT also announced that it will no longer continue to deliver Chiropractic Medicine ⁽⁴⁸⁾.

It is likely that public universities discontinue programs in CM modalities more as a result of political pressures than economic ones. The Friends of Science in Medicine regard Acupuncture and Naturopathy as “pseudo-science” and continue to lobby hard for their removal from public universities, and to ensure scarce government support for their public funding. Public universities may also face internal political pressures should they have a medical school that is concerned about its reputation from a university that also delivers CM qualifications ^(49; 50).

It is clear that we cannot rely upon public universities to continue to deliver our programs. We cannot rely on private providers, as this discussion has shown the risk and consequences when profits are put before compliance or any sense of loyalty to the profession.

A point made by some is that a majority of our professional associations all agreed on a Bachelor standard, and that this should be supported over a minority of associations that disagreed. The Homeopathic community also joined the push for ‘Bachelor minimum’, and are a good example of how relying on private Higher Education providers has backfired. After 2015, the Australian Register of Homeopaths (ARoH) was placed in the absurd position of having to recommend that anyone wishing to become a Homeopath in Australia undertake their studies with one of three colleges overseas, as there were no Australian colleges offering a Bachelor in Homeopathy. They have since revised their membership criteria such that colleges offering an Advanced Diploma program can now be accredited. Switch on Health is currently the only accredited education provider of Homeopathy in Australia. Homeopathy is a good example of the need to continue to recognise suitably trained Advanced Diploma graduates in all CM disciplines.





The economics of a Bachelor's degree

Switch on Health is sometimes asked why we don't become a Bachelor provider. There are many reasons why, and cost is a significant one. Why does studying a Bachelor of Naturopathy cost > \$70,000, yet an Advanced Diploma program, that may look almost identical, cost ~ \$30,000?

Initial registration with TEQSA as a Higher Education provider costs \$113,500 in registration costs alone. In addition, there is a fee of \$44,700 *per qualification*, as well as ongoing renewal fees⁽⁵¹⁾. (This may explain why private providers are reducing the number of Bachelor programs they offer). As well as a board of directors, the provider must also have governance via an education board. This will consist of academics who expect to be paid for their time.

Becoming a Higher Education provider that is regulated by TEQSA comes at considerable cost. These costs are passed on to students in the way of higher course fees to complete their degree. And graduates will presumably also have to find a way to recoup their student debt by charging higher consultation fees to their clients. Everyone loses! (Except the regulator).

Removal of choice

Any organisation that stipulates that new graduates must hold a Bachelor degree must accept the following facts.

- The number of CM programs at public universities is in decline, and there are currently no public universities offering a professionally (ATMS) accredited Bachelor's degree in Naturopathy.
- There are only two private providers in Australia offering a professionally accredited Bachelor program.
- Completion of these programs necessitates attendance on-campus at the Gold Coast or a State capital city.
- Someone wishing to study who resides in the ACT, NT, or Tasmania, must move interstate to complete their studies.
- With the cost of their Bachelor program being > \$70,000, they will likely take out a loan from the government to fund their studies. This loan is index linked, and currently increases by ~ 7% p.a.

The demographic of those wishing to pursue studies in Naturopathy is weighted towards students over the age of 30, many with their own families already. For these people, relocating with their families to attend classes at specific times is not an option. For them, it is not a question of 'Advanced Diploma or Bachelor'. It is 'Advanced Diploma or nothing.' Organisations or individuals adhering to the





'Bachelor minimum' mantra are resigning themselves to a decrease in the number of professionals entering the industry. The industry will shrink, and not grow, as a result.

RTOs (Registered Training Organisations) – Myths and misinformation

Some concern has been expressed that Switch on Health and Nature Care College are not Registered Training Organisations (RTOs). The first clarification that needs to be made here is that the function of an RTO is to deliver *nationally recognised* (i.e. Training Package) qualifications. The current Advanced Diploma programs are private industry accredited offerings that do not form part of the Training Package. To suggest that Switch on Health and Nature Care College should be RTOs is rather like saying someone should hold a motorcycle license if they want to ride their bicycle.

An assertion made by some is that if a college is not an RTO, there is no protection offered for students, and they may be more susceptible to poor business practices such as fraud and misconduct ^(20; 52). Those making these claims appear to be unaware that the greatest instances of fraud and misconduct in education over last 10 years have in fact been committed by RTO's ⁽¹¹⁾. This has been discussed in the earlier section on the impact of VET FEE-HELP, and [Appendix A](#) provides some shocking data on the scale of misconduct perpetrated by RTOs.

The last decade has seen an unfortunate abundance of RTOs that have closed suddenly and left thousands of students in the lurch, each owing thousands in debt to an unsympathetic government, and with little or no formal evidence of studies completed. Regulation of RTOs by ASQA has failed dismally to prevent any of this from occurring. This is not just an unfortunate chapter from the last decade. It continues to this day, with one recent example being the sudden collapse of Inspire Education in 2022, which has left "13,000 students in limbo" ⁽⁵³⁾.

Furthermore, sudden closure of training institutions is not limited to vocational education providers. We also have an example of a Higher Education (Bachelor) provider closing suddenly; one that offered a Bachelor of Health Science (Naturopathy). Paramount College of Natural Medicine closed suddenly and unexpectedly in late 2018. When Switch on Health first opened in early 2019, we were contacted by a number of students from Paramount College of Natural Medicine, some of whom were one semester or less away from graduating, and who were desperately seeking solutions to complete their studies.

We can see that being an RTO regulated by ASQA, or even a Bachelor provider regulated by TEQSA, **does not confer protection for students**. It is farcical to suggest that a private college that is owned and operated by an Australian Naturopath cares less for its students, and places them at greater risk than the RTOs who rorted the system over the last decade.





Both Switch on Health and Nature Care College are staffed by people with years of experience in the industry, and a passion for natural health. These colleges are accredited by ATMS and can be audited at any time for the quality of the training that they deliver.

'Practitioner Only' and the TGA

There are certain advertising restrictions that would apply to products and information marketed to the public that do not apply when the target audience is healthcare professionals. 'Practitioner Only' companies will want to know that when supplying products or educational resources to account holders, that they are not in breach of any TGA regulations.

[Appendix B](#) is a document produced by the TGA regarding the Therapeutic Goods Act 1989 and Schedule 1 of the Therapeutic Goods Regulations 1990. It spells out the requirements for compliance, and is summarised here in bullet form.

- The Act does not require complementary medicine professionals to be registered. The Act does not recognise the status of any healthcare professionals.
- Certain advertising offences in the Act do not apply to healthcare professionals such as Naturopaths and Nutritionists who are members of an Australian branch of a body such as ATMS. (ATMS is specifically mentioned in Schedule 1).
- A person is taken to be a member of such a body if they have the qualifications and training necessary or appropriate for membership of that organisation.
- "The decision as to who is 'appropriately qualified' is a decision vested in the governing body of the organisation."

This means that since the ATMS board of directors has approved these Advanced Diplomas, having been through a thorough accreditation process, graduates who take up professional membership with ATMS meet the definition of healthcare professionals as outlined in the Therapeutic Goods Act. A 'Practitioner Only' company will therefore not be in breach of TGA regulations when supplying to ATMS accredited practitioners in that modality. Together, ATMS and its accredited education providers ensure that potential account holders have undertaken the appropriate level of training and education.

Are double standards acceptable?

We have recently seen various 'Practitioner Only' companies declare that they will not recognise Advanced Diploma graduates in Naturopathy moving forward. Such





a move will obviously have an impact on the number of accounts and sales by these companies, however they have a clause that helps to protect them against a loss in sales. They have declared that to access their products and services, someone could hold a Bachelor's degree in a medical or health related field, and/or be qualified in a modality regulated by AHPRA ^(21: 20). A quick look at the current account holders of these companies tells you that this includes a wide range of Allied Health professionals, such as dentists, chiropractors, and physiotherapists, among others ^(54: 55). We propose that it is a baseless argument to suggest this is about education standards, when a physiotherapist with no training in Nutrition or Herbal Medicine can access these products, but someone with three years of professionally recognised training in Nutrition and Herbal Medicine cannot. Such hypocrisy can only damage the credibility of any company that attempts to justify that position.

There is also irony in various individuals holding key positions in stakeholder organisations throwing their support behind these companies, when they themselves are 'only' qualified at an Advanced Diploma level. Such individuals may have qualified over 10 years ago, but have never found the time to upgrade to a Bachelor's degree. It appears that it is okay for them to enjoy a successful career with an Advanced Diploma, but to deny others the same opportunity.

Who benefits?

Who benefits when a 'Practitioner Only' brand decides not to support graduates entering the workforce with a professionally recognised Advanced Diploma qualification?

The 'Practitioner Only' company does not benefit. They experience fewer new account applications from Naturopaths, and fewer sales, and decreased brand awareness as a result. Should they also continue to support AHPRA regulated professionals with no training in Nutrition and Herbal Medicine, they are likely to also incur damage to their reputation and credibility within the Naturopathic profession.

Those studying Advanced Diploma programs do not benefit. They are essentially being discriminated against, even if their training is comparable to their peers.

Most importantly, the future patients of these graduates do not benefit. They will not be supplied with products or resources via their practitioner that may assist them with their healthcare needs. Consumers of CM in Australia are the primary reason our entire profession and industry exist. They should be considered *first* in any decisions relating to CM in Australia. If they stand to lose, what is the basis for this decision?





Conclusion

Switch on Health is the only college of its kind to be owned and operated by an Australian Naturopath. It is also the only college in Australia to offer a professionally recognised qualification in Homeopathy. It is accredited by both ATMS and ARoH.

Martin Stone and the Switch on Health team members have extensive experience in clinical practice, in education, and in business. They are passionate about bringing the best in natural therapies education to their clients. The Switch on Health mission statement is this:

Everyone has the right to a happier and healthier life

We believe that the opportunity to study Naturopathy and to practice as a Naturopath should be available to everyone, regardless of where they live. We wish to see CM thrive and flourish in Australia. We would hope that other stakeholders within the industry would share these values and operate in alignment.

We take our role as an education provider very seriously. Our programs do not just meet ATMS education standards, but surpass them. We take the future of natural medicine seriously, and this includes the reputation of our college and of the profession as a whole.

Switch on Health welcomes you to ask any questions about our curriculum and the quality of training that we provide. We practice continuous improvement in our programs and we welcome any feedback.





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