



Nurse Education in the Tertiary Sector

Nurse Education in the Tertiary Sector (NETS)

Submission in response to

Ministry of Health Consultation document

Proposal that Traditional Chinese Medicine Become a Regulated Profession
under the Health Practitioners Competence Assurance Act 2003

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We appreciate the opportunity to be involved in the consultation process regarding the proposed regulation of Traditional Chinese Medicine practitioners. Our comments are provided in response to the questions raised in the consultation document.

1. Is TCM a health service, as defined by the HPCA Act? (Note: the Act defines a health service as ‘a service provided for the purpose of assessing, improving, protecting, or managing the physical or mental health of individuals or groups of individuals’.)

Response: It is not clear if Acupuncture is considered part of TCM. If it includes acupuncture then it is worth noting that ACC approved acupuncturists as service providers. However, TCM as a discipline on its own appears to involve assessing and managing/treating individuals from an Eastern Medicine perspective, thus it could be seen as a health service in terms of the HPCA Act.

2. Are practitioners of TCM generally agreed on the qualifications required to deliver the health services they provide?

Response: Whilst there is competition between two societies for “control”, discussions with members of both seems to indicate a philosophical support of the need for this step. Some are simply pragmatic and see it as a means to obtain subsidised care

3. Is there a risk of harm to the public from the practice of TCM?

Response: All forms of therapeutic interventions have elements of risk and in the interest of public safety, health professions such as medicine, nursing etc are regulated, TCM should be no different. There is more risk from the lack of regulation. In New Zealand, TCM is being practiced anyway and the risk remains irrespective of regulation.

4. If so, what are the nature, frequency, severity and potential impact of risks to the public? What is the likelihood of the harm occurring?

Response: It is difficult to ascertain what the current situation is. However an informed public will have a voice and be more prepared to seek help/report bad practice as per “mainstream” medicine

5. Other than on the basis of risk of harm, is it in the public interest that the profession of TCM be regulated?

Response: Regulation leads to minimum standards in education and training which should be in the general interest of the public.

6. Are practising TCM practitioners generally agreed on the standards that TCM practitioners are expected to meet?

Response: Surely that needs to be asked of the industry. If there is no consistency, then legislation can direct and ensure the establishment of standards for practice and education. In our interactions with TCM practitioners it is clear that there are different schools of thought on TCM in China and that they influence what is happening in New Zealand.

7. Are practising TCM practitioners generally agreed on the competencies for scopes of practice for TCM?

Response: We doubt if they are as this will be embedded in the schools of thought behind the practice. It is an area for further development

8. What qualifications are generally held by members of the profession, and what is the degree of uniformity in qualifications across members?

Response: Generally, both in China and in developed countries, there has been a concerted effort to raise the qualification for entry to practice to a degree level. In New Zealand TCM is part of the BHSc degree offered by the New Zealand College of Chinese Medicine

9. Does your organisation accord any standing or status to the profession of TCM, or to those who practise as TCM practitioners?

Response: NETS offers a collegial response and recognition that TCM offers choice and hence elements of TCM are supported in discussion around health choices in some undergraduate nursing programmes.

We trust you find our comments constructive, and thank you again for the opportunity to comment.