



Australian Hypnotherapists' Association

Founded 1949

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A Member Association of the Psychotherapy and Counselling Federation of Australia (PACFA)

Minister for Health,
The Hon Nicola Roxon, MP
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Dear Ms Nicola Roxon

AUSTRALIAN HYPNOTHERAPISTS' ASSOCIATION (AHA) SUBMISSION ON THE DRAFT REGULATIONS FOR THE HEALTHCARE IDENTIFIERS SERVICE

This submission is by the Australian Hypnotherapists Association (AHA) for the highly qualified and self-regulated profession of Hypnotherapy, and speaks to the omissions in the Draft Regulations for the Healthcare Identifier Service by the eHealth Branch Primary and Ambulatory Care Division of the Department of Health and Ageing.

On 10 February 2010 the Minister for Health and Ageing, the Hon. Nicola Roxon MP, introduced into Parliament the Healthcare Identifiers Bill 2010 ('the HI Bill'). The HI Bill outlines the framework for a National Healthcare Identifiers Service. The HI Bill supports the Service Operator assigning, collecting and maintaining identifiers for healthcare providers and healthcare organisations. The HI Bill provides the authority for regulations to be issued to support the operation of the HI Service. This submission by the AHA expresses deep concern that the Draft Regulations are proposed to exclude Accredited Registered Hypnotherapists from the initial classes of health care providers who can be assigned identifiers. Yet the inclusion of psychologists would confirm the importance of mental health professionals in the HI service. In the interests of full identification of healthcare providers it is important that Accredited Registered Hypnotherapists are not excluded.

BACKGROUND

The Australian Hypnotherapists' Association (AHA) is the oldest and largest hypnotherapy association in Australia. It was established in 1949 as the independent National Peak Registration body for Hypnotherapists. The AHA's National Hypnotherapy Register of Australia (NHRA) was established on 1st July 2009 to comply with the Private Health Insurance (Accreditation) Rules 2008, as the independent national professional self-registration body recognised by, and representative of, the majority of Hypnotherapists in Australia. The main object of the NHRA is to maintain an independent National Register of Hypnotherapists that hold recognised qualifications, participate in continuing professional education and supervision as well as to:-

- i) promote and enhance the public and professional recognition and identity of the Hypnotherapy profession and NHRA Registered Hypnotherapists by undertaking registration of all persons, (who comply with the clinical and professional training and accreditation standards), seeking recognition as accredited Registered Hypnotherapists.
- iii) promote the profession of Hypnotherapy by enhancing the public and professional recognition and identity of accredited NHRA Registered Hypnotherapists.
- iv) to take steps to promote and protect the status and title of Registered Hypnotherapists as the trade mark, qualifications and intellectual property of persons approved for membership of the

National Hypnotherapists Register of Australia (NHRA) by the Board Executive from time to time;

v) promote the registration or recognition of training and educational institutions with commitment to professional and ethical standards to train and educate applicants for the profession of Hypnotherapy.

vi) create and support improvements in the law, to promote deputations and to take such other steps and proceedings as may be deemed beneficial for the continuance of any of the objects of the NHRA Register

In Australia, the regulation of health professions is split between those regulated by statutory legislation and those professions (such as Hypnotherapy) that are self-regulated. It is our understanding that the Federal Government formed a standing committee called the Regulation Sub-Committee of the Australian Health Workforce Officials Committee to work towards a national co-regulatory system of registration of all health professionals.

In July 2006 the Council of Australian Government (COAG) agreed to the National Action Plan on Mental Health 2006-2011. COAG agreed to establish a single national registration scheme for health professionals, beginning with the nine professional groups then registered in all jurisdictions. Also in 2006 the Prime Minister announced federal funding of \$1.8 billion over five years to improve mental health services including increased access to mental health professionals working in multi-disciplinary teams, and increases in the mental health community awareness programs.

This submission expresses concern that as of 1 July 2010, only ten health professions will be included in the national registration and accreditation system for the Australian health industry, with only an extra four professions to be included by 2012. The Health Practitioner Regulation National Law Act 2009 is to establish a single national registration and accreditation system. It is submitted that the exclusion of the allied health profession of hypnotherapy, by Registered Hypnotherapists, from the proposed single national registration and accreditation system means that the system cannot fully achieve the stated benefits to the Australian public.

Under these conditions, the decision to exclude Registered Hypnotherapists from the provisions of the Act appears to constitute a **deliberate restraint of trade** in favour of the healthcare providers that are to be included in the directory. The exclusion represents a denial that the Registered Professional Hypnotherapists have extensive training and supervision and are a well qualified source of early preventative mental health care that is being under utilised in the current system.

Therefore not only is the proposed HI Service a restraint of trade but the recent report from the NSW Coronial Inquiry into the suicide of Rebekah Lawrence as well as the recent media exposure of unqualified practitioners acting as counsellors to the detriment of public health and safety indicates **the necessity for all allied health practitioners to be registered**. This can be regulated by statutory legislation and by self-regulation of the various professions in the Health industry under the proposed single national registration and accreditation system.

NHRA is the national credentialing system for qualified Hypnotherapists and meets all the requirements of the Private Health Insurance (Accreditation) Rules 2008. Therefore assuming that it the intent of the Department of Health and Ageing to assign a healthcare identifier to all healthcare providers and not to discriminate against qualified accredited registered Hypnotherapists and to provide access to services for healthcare recipients on the widest

possible platform of access and equity, NHRA offers an existing means of national professional registration and delivery of hypnotherapy healthcare identifiers across the nation.

Acceptance by the National Registration Authority for the profession of Hypnotherapy self-regulation will enable the creation of a unified rather than a fragmented system of healthcare information. This will include uniform transaction and outcome recording, referral from healthcare providers to other healthcare providers including GPs and mental health specialists and provide greater choice and accessibility of all appropriate and qualified mental health practitioners.

In this context, it is submitted that qualified Accredited NHRA Hypnotherapists should be accepted as an initial Service Operator for the provision of healthcare identifiers at the same time as the other health and allied health service providers to ensure that clients can be adequately linked to desired and required health services. In this way it will be possible to ensure that the introduction of healthcare identifiers will not change the way the public can access healthcare services or how information is shared by health care providers.

We acknowledge that the Department of Health and Ageing is yet to release details of its 2010 Review of the Better Access initiative and that it is advantageous to create a uniform national healthcare identifier for consumers and providers of healthcare service. Consequently it is requested that the Australian Health Ministers' Advisory Council advise all State and Territory legislators and administrators of the existence of the National Hypnotherapists Register of Australia (NHRA) noting that registration requires that each NHRA member is required to uphold NHRA national standards of practice and code of conduct so as to protect the public from bogus operators.

In conclusion the Australian Hypnotherapy Association endorses the strategic intent of the Healthcare Identifiers Bill 2010 but wishes to express our concern that the Proposed Regulations for the HI service fails to provide for the inclusion of services from qualified hypnotherapists

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